

**SOUTHEAST ARKANSAS WORKFORCE DEVELOPMENT BOARD
P. O. BOX 6806
PINE BLUFF, AR 71611**

Phone (870) 536-1971

Fax (870) 536-7718

southeastarkansas.org/services/workforce/

Duplication of Services/ Co-Enrollment & Co-Funding Policy Co-Enrollment Procedure

Purpose

The purpose of this policy is to describe the requirements and regulations concerning the no duplication of services and co-enrollment and/or co-funding of WIOA Title I-B participants with various WIOA Title I-B programs, with other WIOA programs, with Arkansas Job Center partners, and with other appropriate entities, in accordance with the Workforce Innovation and Opportunity Act of 2014 (WIOA), the WIOA Final Rule, Training and Employment Guidance Letters (TEGLs) published by the Employment and Training Administration of the U.S. Department of Labor (ETA), and policies of the Arkansas Workforce Development Board (AWDB and the Southeast Arkansas Workforce Development Board (SEAWDB).

Reference: (WIOA Law)

<https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf>

Policy:

Under WIOA I-B, participants may be eligible for Youth, Adult, and/or Dislocated Worker services. The participant may also be eligible for the services of other one-stop partners, as well as services for non-one-stop partners. WIOA I-B case managers must be informed about the services of all WIOA funding streams (including other titles and subtitles). Case managers must coordinate with other agencies as appropriate to provide the full array of services documented as needed by the participant [WIOA § 134(b)(2)(A)(v); 20 CFR 680.230]. Co-enrollment (or dual-enrollment) and/or co-funding with other entities is encouraged in order to give participants the best array of services, however the duplication of services is not permitted [TEGL 19-16].

Co-enrollment within WIOA Title I Adult, Dislocated Worker, and Youth programs

Individuals who meet the respective program and service eligibility requirements may participate in Adult/Dislocated Worker and Youth programs concurrently. SEAWDB program operators may determine the appropriate level and balance of services under the Youth and Adult/Dislocated Worker programs. This determination depends not only on the eligibility requirements of each program, but also on the services needed by each participant [TEGL 19-16].

Services available under each funding stream will depend on eligibility for services under that funding stream. SEAWDB program operators may determine the appropriate level and balance of services for each individual under each program. Local program operators must identify and track the funding streams that pay the costs of services and ensure no duplication of services [20 CFR 681.430]. However, if it is determined that only the Youth or the Adult/Dislocated Worker program array of services is appropriate for an individual aged 18 – 24, then the SEAWDB program provider may enroll the participant in only one program [20 CFR 681.440].

Co-enrollment and Co-funding with Other Programs

WIOA Title I-B program providers are encouraged to work with other Workforce Center partners and other entities to provide a full array of needed services to participants. Not only does this strategy provide more services, it provides more case management to the participant, thus providing greater probability for success. WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of their training or require assistance beyond that available under grant assistance from other sources to pay the costs of such training.

WIOA Title I-B Service Providers must not only ensure that participants apply for Pell Grants and other appropriate grants, but they must also coordinate funding with other one-stop partners and other entities for which the participant is eligible [20 CFR 680.230]. In order to appropriately coordinate funding and co-enrollment, case managers must be trained in programs and eligibility requirements of other one-stop partners and other local and state entities providing services needed by their participants so they can leverage the funding of other sources to provide all services needed by WIOA Title I-B participants [A.C.A. 15-4-3711(a)(10)(D)]. Some of these potential entities include, but are not limited to:

1. Career Pathways Initiative for custodial parents attending Arkansas two-year colleges
2. Single Parent Scholarship Funds for each county (www.aspsf.org/scholarships)
3. Arkansas Rehabilitation Services and Division of Services for the Blind
4. TEA / Work Pays
5. TAA
6. WIOA Title I-D Dislocated Worker Grants and other Discretionary Grants
7. Veterans' Services

8. State and institutional scholarships
9. Department of Human Services
10. Food Stamp Employment and Training Programs
11. Arkansas Human Development Corporation (National Farmworker Jobs Program)
12. American Indian Center of Arkansas
13. Local housing authority
14. Local homeless shelter(s)
15. Local food banks and distribution centers
16. Local provider of assistance with utilities
17. Local provider of older worker services (Title V of the Older Americans Act of 1965, 42 U.S.C. § 3056 et seq.)
18. Community Service Block Grants
19. Programs funded by the Second Chance Act
20. Other Arkansas Job Center partners, as appropriate

WIOA Title 1-B Adult, Dislocated Worker, and Youth participants should be referred to and co-enrolled (or co-funded) with these services and other available services as appropriate.

The specific services provided to such participants will depend on the needs of the participant and funding availability in the SEAWDB area. WIOA Title I-B Adult and Dislocated Worker funds may support adult education and literacy activities of the Arkansas Department of Career Education Adult Education Division, the Arkansas Literacy Council, and other programs providing adult education and literacy activities if the participant is also engaged in one of the following [20 CFR 680.350]:

1. Occupational skills training, including training for nontraditional employment
2. On-the-job training (OJT)
3. Incumbent worker training, as described in ADWS Policy No. WIOA I-B – 3.6 (Incumbent Worker Training)
4. Programs that combined workplace training and related instruction, which may include cooperative education programs
5. Training programs operated by the private sector
6. Skill upgrading and retraining
7. Entrepreneurial training

SEAWDB will ensure that services are not duplicated for individuals enrolled in multiple programs.

Approved/Amended Date: _____

Approved:

SEAWDB Chairperson Date

Amended:

 2/21/24

SEAWDB Chairperson Date

Southeast Arkansas Workforce Development Area

Co-Enrollment Procedure

Effective 2/21/2024

Under WIOA, the ages for youth and adults overlap and allows for participants to be co-enrolled into two separate WIOA programs such as In-School Youth and Adult, if eligible, and there is a need for specific services. The same shall apply to Out-of-School Youth and Adult co-enrollment or NEG and DLW co-enrollment. Eligibility guidelines must be followed for each program in which the participant is enrolled.

In-School Youth cannot be co-enrolled as Out-of-School Youth. However, if there is a need to enroll a previous ISY into the OSY program, the ISY enrollment must be officially exited in AJL before the OSY enrollment can begin.

To co-enroll a participant, the individual must meet all eligibility criteria at the time of the second enrollment and an entirely new packet for the appropriate program must be completed.

The I-9 documents (SS card and driver's license or state ID) from the first enrollment can be accepted only if the documents have not expired. If they have expired, a new one must be submitted before co-enrollment can be approved.

The ISS/IEP will need to be modified to show the reasoning and benefit of the co-enrollment. For instance, if an ISY graduated high school and is now planning to attend college, they must be co-enrolled as an Adult to offer an ITA.

Contact and demographics must be updated in AJL before the new enrollment can be added. These will reflect the situation at the time of the second enrollment, which may be very different than the first enrollment.

Make sure that services are not repeated in each enrollment. For instance, if an ISY was receiving supportive services but now that support will be paid with Adult funds, close the ISY supportive services and open in Adult.

Youth who are co-enrolled must continue receiving original required services for youth throughout the enrollment. A service consisting of one of the 14 elements must be provided to the participant monthly while the participant is active. A case note in both enrollments is required monthly. As long as the note covers the required information for both programs, a simple copy and paste is sufficient. Youth follow-up services are still required throughout the 12-month follow-up period after the expected exit date.

Do not forget that male participants **MUST** register for the selective service. If they have not done so and are now 26 or older, they must have a valid reason why they did not register such as incarcerated or overseas the entire time they could have registered. This reason must be documented following the guidelines in the case manager policy manual. Also, any male who turns 18 during enrollment must register for selective service and the proof added to the folder.

If a participant in work experience is co-enrolled into two WIOA programs, update the Employment Notice to provide and give to Finance so that the funding will be applied correctly. The document must be placed in the participant folder.