

CO-ENROLLMENT POLICY

The Jefferson Franklin Consortium shall abide by all the co-enrollment requirements outlined in the most recent Office of Workforce Development's Statewide Enrollment and Exit policy which is currently OWD Issuance 08-2021. This policy is attached for easy reference.

All staff must adhere to this policy when enrolling participants into the workforce system. The Jefferson Franklin Consortium does not have any additional local requirements currently.



Missouri Department of Higher Education and Workforce Development

OWD Issuance: 08-2021

Release Number—Program Year

Release Date: September 08, 2021

Effective Date: September 08, 2021

Expiration Date: Continuous, until further notice

SUBJECT: Statewide Enrollment and Exit Policy

ATTACHMENTS: Attachment 1-Career Services Attachment 2-WIOA referral desk aid

This Issuance is Official Policy of the Missouri Office of Workforce Development

ISSUING AUTHORITY:

Mardy Leathers, DMgt Director Office of Workforce Development (OWD)

THIS ISSUANCE DOES REQUIRE CREATION OR ALTERATION OF A CORRESPONDING LOCAL POLICY

KEYWORDS:

Basic Services, Co-enrollment, Common Exit, Follow-up, Intensive Services, Trade Adjustment Assistance, Training Services, WIOA.

THIS ISSUANCE AFFECTS:

Missouri One-Stop Delivery System (MJs/AJCs) WIOA Title I Performance/Accountability WIOA Title I One-Stop Delivery/Service Providers WIOA Title I Local Areas/Local Boards/Local Plans WIOA Title I In-State Funding WIOA Title I Performance/Accountability State of Missouri Workforce System Procedures

FOR THE ATTENTION OF:

DHEWD State Professional Staff Sub-recipient Staff Local Fiscal Agents One-Stop Operators Service Providers Local WDB Directors Local Compliance Monitors

RESCISSIONS:

OWD Issuance 12-2020, "Statewide Enrollment and Exit Policy," April 1, 2021.

REFERENCES:

U.S. Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter (TEGL) 10-16, Change 1, "Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs," August 23, 2017.

TEGL 7-20, "Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program," November 24, 2020.

TEGL 19-16, "Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules," March 1, 2017.

OWD Issuance 04-2020, "WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance," August 28, 2020.

20 CFR 682 Subpart C.

29 CFR 38

Missouri Nondiscrimination Plan

SUMMARY:

This Issuance provides Office of Workforce Development (OWD) guidance to Local Workforce Development Boards (Local WDBs) and Workforce Staff regarding co-enrollment, WIOA basic enrollments, WIOA services distinction, common exit procedures, and quarterly follow-up requirements. The WIOA program enrollments require numerous data elements. Therefore, OWD requires co-enrollments linking WIOA Title I programs with specific non-Title I programs such as Wagner-Peyser (WP), Trade Adjustment Assistance (TAA), National Dislocated Worker Grants, which are all programs under the United States Department of Labor (DOL) authority. Additionally this issuance is to ensure the recipient has complied or is complying with the nondiscrimination and equal opportunity provisions of WIOA by collecting and maintaining the required data and records to conduct a statistical or other quantifiable data analyses to verify the recipient's compliance with section 188 of WIOA, 29 CFR 38, and the Missouri Nondiscrimination Plan.

BACKGROUND:

[TEGL 10-16, Change 1](#), "Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs," identifies 13 Career Services defined as self-service or informational in nature. This list is included as [Attachment 7 – Table A](#) of the TEGL. Providing these self-service and informational services does not change a customer's status from "reportable individual" to "participant" and the customer is not considered enrolled into the applicable program.

All of the Labor Exchange services authorized by WP are classified as WIOA Basic or Individualized Career Services and, must be delivered by all Missouri Job Center staff. The only Missouri Job Center services that are restricted to State staff are those funded by the Jobs for Veterans State Grant.

All appropriate staff, regardless of their employer of record or funding source, must promptly provide Career Services for both WIOA Title I Adult and Dislocated Worker customers, and Title III WP customers. Staff must enroll and provide services in the program in which they are funded (i.e. WP staff will post services to the WP application and WIOA staff will post services to both the WP and the WIOA applications in the statewide case-management system). These services may be recorded by any staff authorized to utilize the statewide electronic case-management system, under the appropriate program providing the service.

Guidance from DOL Employment and Training Administration (ETA) defines the "point of exit" for performance reporting. This guidance clearly establishes policy restricting program operators' control of the date of exit from the workforce programs included in the Primary Indicators of Performance. Participants will exit the program(s) having gone 90 days without receiving a countable service, for performance-accountability purposes.

Missouri has adopted the common exit approach for WIOA Title I Adult and Dislocated Worker, WIOA Title I Youth, WIOA Title III WP, and TAA programs. The exit date is the last date of service. Common exit is a requirement that a participant is only exited when all the criteria for exit are met for the WIOA titles I and III core programs, as well as any additional DOL-administered required partner programs to which the State's common exit policy applies in

which the participant is enrolled.¹

SUBSTANCE:

All customers of WIOA Partners must be presented with the availability of services for which they are eligible—or potentially eligible. They must be actively engaged and assisted in co-enrolling in services they choose. Such staff activity helps implement a central principle of WIOA—that of maximizing informed consumer choice.

To provide that choice, WIOA Partners must work together by focusing on effective co-enrollments in order to bridge the gap between services. When WIOA Partners co-enroll customers, we are better able to:

- Achieve the vision and goals laid out in WIOA;
- Improve participant outcomes by meeting the needs of employers and jobseekers;
- Improve WIOA Partner outcomes by collaborating to achieve our performance goals; and
- Eliminate barriers to services and reduce the burden on customers to identify and access our services.

Mandatory Co-Enrollment Requirement:

- All job seekers receiving staff-assisted services in a Missouri Job Center (including Youth) must be enrolled in the WP program.
 - Any Missouri Job Center staff can—and should—complete the WP enrollment in the statewide electronic case-management system.
 - WIOA funded staff must complete a WIOA Basic Career enrollment immediately after completing a WP application.
 - Co-enrollment will ensure individuals receive employment services and other services they may be eligible for under the WIOA Title I programs.
- All TAA participants must be co-enrolled in the WIOA Dislocated Worker program, unless the enrollment is waived by the participant.
 - The TAA Code of Federal Regulations dictates that all TAA eligible workers² must have employment and case management services available, including placement and referrals to supportive services and follow-up services available through partner programs, to trade-affected workers during training, and after completion of training, and for adversely affected workers on a waiver from training³.
 - Co-enrollment will ensure individuals receive the benefits and services they may be eligible for under the TAA and Title I Dislocated Worker programs.
 - Coordination of services and non-duplication through co-enrollment helps Federal resources go further in local areas and provides participants with access to a comprehensive suite of services.
- All National Dislocated Worker Grant participants must be co-enrolled in the WIOA Dislocated Worker program if they meet the eligibility requirements.

¹ [20 CFR 677.150\(c\)\(3\)\(ii\)](#)

² 20 CFR 325(b)(3) Some trade-affected workers are ineligible for the WIOA dislocated worker program, including those that do not meet the Selective Service registration requirement, and will be exempt from the co-enrollment requirement.

³ [20 CFR 618.360](#)

Other co-enrollment in complementary programs is consistent with the intent of WIOA. Use this approach as appropriate, at the discretion of the Local WDB, in line with stated policy in its approved Local Plan.

At the discretion of the Local WDB, OWD staff may be authorized to enroll individuals in WIOA programs. This is allowable because eligibility determination, outreach and intake, comprehensive assessment, employment planning, and follow-up are all Career Services they are required to deliver.

Priority of Service:

The WIOA regulations require states and Local Workforce Development Areas (LWDAs) to establish priority of service criteria for Adult program-funded Individualized Career Services and Training Services. The State's policy is that Local WDBs must establish tiered, local, priority-of-service policies. These policies must assign top priority to:

- Public-assistance recipients;
- Low-income individuals, and
- Individuals who are basic-skills deficient (including English language learners).

These policies must also allow other eligible individuals outside of the top-priority group to have access to these services. DOL's recommendation⁴ is to give priority of service to these individuals ensuring that at least 75% of a state's participants receiving individualized career and training services, *in the Adult program*, are from at least one of the priority groups mentioned above. **The priority of service rate must never be lower than 50.1%.**

These priorities are in addition to the requirements in the WIOA regulations at [20 CFR 680.650](#) that mandate veterans and their eligible spouses receive priority of service for all DOL funded job training programs, including the WIOA Adult program. Please refer to the State's most current guidance on this subject.⁵

WP and WIOA funds are to be used to provide Career Services. Additionally, both WP and WIOA staff must provide Basic and Individualized Career Services to customers. Any Career Service provided by WIOA-funded staff that is not defined as self-service or informational-only requires enrollment in the WIOA program for which the participant is determined eligible. This issuance requires WIOA funded staff to complete (at a minimum) a WIOA Adult Basic Career enrollment when providing these services. If enrolling into DW program full DW eligibility is required.

WIOA Referral:

Each WIOA Title I recipient must record the race/ethnicity, sex, age, limited English proficiency, preferred language and where known, disability status, of every applicant, registrant, participant, and

⁴ [TEGL 7-20](#), "Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program," November 24, 2020.

⁵ [OWD Issuance 10-2016](#), "Priority of Service for Veterans and Eligible Spouses," February 1, 2017.

exiter (for employment practices refer to the MO Nondiscrimination plan). Record the information in the statewide case management system within the applications.

Effectively conducting an analysis on each record requires each level of service to be documented and resulted in the statewide case management system. This includes recording if a job seeker has been referred to a service and determined eligible or ineligible for WIOA Basic Career services.⁶

Staff must follow the steps in the attached desk aid to obtain and report the results of the referral.

Basic Career Services:

For the WIOA Adult program (staff-assisted Basic Career Services only), participants do not have to demonstrate low-income status⁷, however an attestation of their income must be obtained. The general eligibility requirements, as outlined in OWD's *most current* Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance⁸, are the only additional required documentation.

Any Missouri Job Center staff may provide Basic Career services to individuals regardless of WIOA enrollment status. Basic Career Services fall into two groups. They are either self-service/informational services or staff-assisted services (see attachment).

Posting a countable service after only completing a non-countable tasks constitutes falsification of a federal report, which will not be tolerated by OWD. Upon discovery of this, or any other federal report falsification, OWD will take appropriate action to determine the extent of the falsification and require disciplinary action.

Individualized Career Services:

Individualized services (see attachment) are specific services that an individual requires to obtain or retain employment. For the WIOA Adult program, individuals requiring individualized career services must be determined fully eligible for the program, an Adult Basic Career enrollment is not allowed in these instances. Staff must follow the Local WDB's priority of service policy as well as the source documentation requirements outlined in OWD's most current Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance; this includes documenting low-income status.

Staff may upload the required eligibility documentation into the statewide electronic case-management system using either one of these secure methods:

- Scanning the documentation on a network scanner/copier that can transmit the image to a staff computer for uploading to the statewide electronic case-management system. This

⁶ [OWD Issuance 02-2019, "Missouri Job Center WIOA Services Delivery & Referrals," July 12, 2019.](#)

⁷ [TEGL 19-16](#), "Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules," March 1, 2017.

⁸ [OWD Issuance 04-2020](#), "WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance," August 28, 2020.

transmission is considered secure if the documentation never leaves the secure network. The State network, and any local network compliant with NIST security standards, is considered secure.

- Scanning the documentation on a scanner that is directly connected to a staff computer for uploading to the statewide electronic case-management system. This transmission is considered secure because the documentation is never transmitted over the Internet.

Training Services:

Training services are those services identified in [Sec. 134\(c\)\(3\)\(D\)](#) as well as Incumbent Worker Training (IWT). Training services, except IWT, trigger program participation and require full WIOA eligibility along with the collection of eligibility documentation.

In addition to full WIOA eligibility, WIOA Adult and Dislocated Worker participants must also meet the “training eligibility” requirements. The training eligibility (training justification) requirements are outlined in OWD’s most current Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance⁹.

Exit Procedures:

The common exit approach for WIOA Title I Adult and Dislocated Worker, WIOA Title I Youth, WIOA Title III WP, and TAA programs reports the exit date is the last date of service. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services; this does not include self-service, information-only services or activities, or follow-up services. This also requires that there are no plans to provide the participant with future services within any program in which they are participating.

Any authorized user who knowingly or willingly posts a false activity or service in the statewide case-management system (or any authorized user who instructs another user to post such an activity) to prevent a timely exit will be falsifying a record and compromising the integrity of the record and/or database. Such an action constitutes a violation of OWD’s Confidentiality and Information Security Plan, subject to the disciplinary and/or legal penalties therein. This can include suspension or debarment from access to the case-management system or termination of employment. Depending on its severity, such action also may constitute violation of State or federal laws or regulations and may be subject to additional administrative remedies or criminal prosecution.

Case management services and any other required administrative caseload management activities that involve regular contact with the participant or employer to obtain the participant’s employment status, educational progress, or need for additional services also do not constitute services that extend the period of participation. If a participant is not scheduled for future services, it must be documented in case notes, EP closed, and closure tab completed.

A Soft Exit will occur when an individual that has not received documented staff-assisted services for 90 days in the WP, WIOA or TAA programs. The definition of a "soft exit" is an exit that is system

⁹ [OWD Issuance 04-2020](#), “WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance,” August 28, 2020.

generated and is automatically recorded after the participant has gone 90 days without receiving staff-assisted services. The date of common exit will correspond to the last day of the staff-assisted service.

A Hard Exit may occur if any of the following reasons apply during participation or up to the fourth quarter measurement period:

- If the participant exits the program because he or she has become incarcerated in correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant.
- If the participant exits the program because of medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- If the participant is deceased.
- If the participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.
- (Youth participants only). If the participant is in the foster care system as defined in 45 CFR 1255.20(a), and exits the program because the participant has moved from the area as part of such a program or system.
- If the participant is a criminal offender in a correction institution under section 225 of WIOA.

Case Managers must provide back-up documentation and contact OWD's Customer Support Unit (CSU) to request a hard exit. CSU will review all the necessary documentation before the hard exit will be completed.

Follow-up Career Services:

WIOA requires Follow-up Career Services be made *available* to program participants. DOL requires states and Local WDBs to establish policies for the WIOA Adult, Dislocated Worker, and Youth programs that define appropriate follow-up services and when to provide them. The purpose of follow-up career services is to ensure that the participant is able to retain employment, to obtain wage increases, and to advance in a career. While Local WDBs must make follow-up services available to employed participants, not every participant will need or want these services.

For WIOA Adult and Dislocated Worker participants, follow-up services must be available for up to 12 months after the first day of unsubsidized employment. Follow-up services are unique to the individual and designed to support the individual to ensure their success in post-secondary education or unsubsidized employment.

Examples of WIOA Adult and Dislocated Worker Follow-Up Career services include:

- Career planning and counseling;
- Assistance with work-related problems;
- Peer support groups;
- Referrals; and
- Information regarding educational opportunities.

Adults and Dislocated Worker program participants may not receive Supportive Services.

For TAA participants, a referral must be made to the WIOA Dislocated Worker program after the TAA funded training is complete in order to participate in follow-up services.

For Youth participants, follow-up services must be offered for no less than 12 months after the completion of all WIOA enrollment activities. While in follow-up, all youth must be offered an opportunity to receive follow-up services¹⁰ that align with their Individual Service Strategy. Follow-up services are critical services that must have a minimum of 12 months in duration, are unique to the individual and designed to support the Youth to ensure their success in post-secondary education or unsubsidized employment. Follow-up services may be provided beyond 12 months at the State or Local WDB's discretion. Follow-up services may include regular contact with a Youth participant's employer, including assistance in addressing work-related problems that arise.

Examples of Youth program follow-up services include:

- Supportive services;
- Adult mentoring;
- Financial literacy education;
- Services that provide labor market and employment information about in-demand local industry sectors or occupations (including career awareness, career counseling, and career exploration); and
- Preparatory activities for transitioning to post-secondary education and training.

Staff must document follow-up career services in the statewide case-management system by posting the appropriate activity or service and entering an accompanying Case Note.

After Exit Requirements:

Staff are required to complete quarterly follow-up for performance for those individuals enrolled into the WIOA Adult, Dislocated Worker and Youth programs. Providing quality follow-up services, as described above, is different from completing required quarterly follow-up for performance. While staff are required to contact participants or their employer to obtain supplemental employment information in order to complete the quarterly follow-up tabs in the statewide case-management system, this type of contact is not an example of an allowable follow-up service.

For reporting purposes, all exit information must be completed. This includes, but is not limited to, entered employment, school status, youth placement, training-related employment, non-traditional employment, and credential obtainment. The Local WDB must ensure that staff follow-up with all WIOA participants as necessary to report on the WIOA indicators of performance measures in the statewide case-management system:

- For WIOA Adult and Dislocated Worker programs, staff must complete the "follow-ups" tab for the 2nd quarter after exit and 4th quarter after exit sections.
- For WIOA Youth, staff must complete the WIOA "follow-ups" tab for all four quarters after exit

¹⁰ [20 CFR 681.580](#)

sections.

- Staff must contact participants or their employers to obtain the required information to complete the sections in their entirety by the deadline shown.
- Five attempts using different avenues must be made. Each attempt to obtain this information must be documented either in the follow-up tab or in Case Notes.

ROLES, RESPONSIBILITIES, and REQUIRED ACTIONS:

All Local WDB Directors and Missouri Job Center Leadership should immediately inform Frontline Workforce System Staff of these requirements.

All Frontline Workforce System Staff handling enrollments and posting services to the statewide electronic case-management system should immediately apply these requirements as described as they apply to Basic Services and Individualized Career Services.

Local WDBs must update any corresponding local policy and submit a Local Plan modification within 90 days.

TIMELINE:

Implementation of these rules.....**Immediate and Continuous**

INQUIRIES:

Please direct all questions or comments regarding this Issuance document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

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