

JEFFERSON FRANKLIN CONSORTIUM 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 01-2023. 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, at this time.



**Missouri Department of
Higher Education and
Workforce Development**

OWD Issuance:
01-2023

Release Number—Program Year

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July 31, 2023
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Expiration Date:
Continuous, until further notice

SUBJECT: Statewide Enrollment and Exit Policy

ATTACHMENTS:
Attachment 1- Service Category Distinctions

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

ISSUING AUTHORITY:

Julie Carter,
Interim 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, Trade
Adjustment Assistance, 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 08-2021, "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 2](#)), "Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs," September 15, 2022.
[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 07-2022](#), "WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance," February 10, 2023
[20 CFR 682 Subpart C](#).

SUMMARY:

This Issuance provides Office of Workforce Development (OWD) guidance to Local Workforce Development Boards (Local WDBs) and Workforce Staff regarding service category distinctions, co-enrollment, priority of service, 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 WIOA Title III-Wagner-Peyser (WP), Trade Adjustment Assistance (TAA), National Dislocated Worker Grants, which are all programs under the United States Department of Labor (DOL) authority.

BACKGROUND:

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 all 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. Refer to Attachment 1- Service Category Distinctions for detailed information regarding eligibility requirements for each category.

Guidance from DOL Employment and Training Administration (ETA) defines the “point of exit” for performance reporting. For WIOA Title I Adult and Dislocated Worker, WIOA Title I Youth, WIOA Title III WP, and TAA programs, “point of exit” is the last date of service. Participants will exit the program(s) having gone 90 days without receiving a countable service, for performance-accountability purposes this guidance also establishes a policy restricting program operators from controlling the date of exit from the workforce programs included in the [Primary Indicators of Performance](#).

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. 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:

Staff must present all customers of WIOA Partners with the availability of services for which they are eligible—or potentially eligible. Staff must actively engage and assist customers in co-enrolling in services they choose. Such staff activity helps implement a central principle of WIOA—that of

¹ [20 CFR 677.150\(c\)\(3\)\(ii\)](#)

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 must—complete the WP enrollment in the statewide electronic case-management system.
 - Career Services provided by WIOA Title I only funded staff in WP beyond information-only that trigger participation into the WP program require (at a minimum) the completion of a WIOA Adult Basic Career (ABC) enrollment; WIOA Title I staff must complete this enrollment directly after completing a WP enrollment.
 - OWD strongly encourages the use of the Common Intake feature in the State Case Management system to complete this mandatory co-enrollment. WIOA only funded staff must not provide WP participation triggering services without completing the ABC enrollment.
 - Please refer to OWD's *most recent Participant Activity Codes, Durations and Definitions Issuance* for Career Services that trigger participation.
 - If enrolling into Dislocated Worker (DW) program full DW eligibility is required.
 - For ABC and DW enrollment please refer to the most recent *Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance* for ABC and DW eligibility requirements.²
- All Trade Adjustment Act (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 workers³ 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 training⁴.

² [OWD Issuance 07-2022](#) WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance

³ [20 CFR 618.325\(b\)\(3\)](#) 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.

⁴ [20 CFR 618.360](#)

- Co-enrollment will ensure individuals receive the benefits and services they may 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.
- TAA participants receiving training services that will result in a credential that is not a recognized Post-Secondary credential (Post-Graduate Degree) by WIOA, are not required to be co-enrolled, as required under this policy. However, if a participant elects for a DW enrollment, the enrollment must occur.
- National Dislocated Worker Grants requirements will be dependent on the individual grant. Co-enrollment policy is outlined in each manual.

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 OWD staff 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 recommendation⁵ 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.⁶

⁵ [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.

⁶ [OWD Issuance 10-2016](#), “Priority of Service for Veterans and Eligible Spouses,” February 1, 2017.

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.

Soft Exit

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

Hard Exit

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 they become incarcerated in correctional institution or becomes 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 lasts 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](#)

[1355.20\(a\)](#), 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 defined under section [225\(e\)\(1\)](#) 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 completing the hard exit.

After Exit Follow-Up Requirements:

Each Local WDB must ensure that staff follow-up with WIOA participants, as necessary, provides accurate reporting on the WIOA indicators of performance measures.

Follow-Up Tabs: Staff is required to timely complete the proper sections by the deadline (shown in the statewide case-management system) for:

- **WIOA Adult and Dislocated Worker**

- a. For customers that are not showing on the performance rosters as reporting wages staff must complete the follow-up tabs for the **2nd** and **4th** quarter after exit.

Staff are required to contact participants to:

1. Obtain supplemental employment information (if applicable).

-OR-

2. Determine that the customer is not employed and offer and provide the appropriate services as needed.

- b. For customers that received WIOA Title I training services staff must complete the follow-up tabs for the **2nd** quarter after exit. Staff are required to contact participants to collect Training Related to Employment information.

- **WIOA Youth**, staff must complete the WIOA follow-up tab for all four quarters after exit sections. For reporting purposes, staff must complete all exit information. This includes, but is not limited to, entered employment, school status, youth placement, and credential obtainment.

Staff must attempt to use different avenues to attempt contact with the participants. Staff must document each attempt to obtain this information 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.

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.

For information about [Missouri Office of Workforce Development](#) services, contact a [Missouri Job Center](#) near you. Locations and additional information are available at jobs.mo.gov or 1-(888)-728-JOBS (5627). Missouri Department of Higher Education and Workforce Development is an [equal opportunity](#) employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Missouri Relay Services at 711.