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March 4, 2022

To: WIOA and Other Subrecipients of the Orange County Workforce Development Area

From: Carma Lacy
Director of Workforce Development

Subject: Co-Enrollment Policy
Information Notice No. 22-OCWDB-01
Supersedes Information Notice No. 8-OCWDA-24

PURPOSE

The purpose of this notice is to provide guidance when enrolling participants into more than one funding stream as a strategy to further leverage resources for maximum benefit to a participant.

EFFECTIVE DATE

This policy is effective immediately upon issuance.

REFERENCES

- WIOA, Public Law 113-128
- Training and Employment Guidance Letter (TEGL) 4-15 (PDF), Subject: *Vision for the One-Stop Delivery System under the WIOA*
- WSD19-09 *Strategic Co-Enrollment – Unified Plan Partners* (February 12, 2020)
- Orange County Comprehensive AJCC Network and Orange County AJCC Partners Memorandum of Understanding (MOU)

BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA) places a strong emphasis on planning and implementation across multiple partner programs to ensure alignment in service delivery. Strategic co-enrollment can increase program and participant success, maximize resources, enable greater efficiencies in service delivery, and align services with regional sector pathways. By braiding resources and realigning program service delivery models, participant flow can be redesigned to facilitate access to comprehensive services. Establishing co-enrollment models will enhance a more efficient use of system resources on behalf of the participant, such as reducing the paperwork required for an individual to provide and complete during intake, streamlining data sharing and tracking of referrals and outcomes, and helps individuals with multiple barriers access coordinated services.



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Key concepts of strategic co-enrollment:

1. Integrated Service Delivery – Establish and participate as an integrated system of partners that share common goals with services offered by multiple organizations for a seamless participant experience. The focus is on clients or target groups who have complex needs that require services from multiple partners.
2. Increased Access – Ensures any participant, especially individuals with barriers to employment, who enter an AJCC, have access to partner programs, services, and activities where they're eligible, including physical and programmatic access, as described in WIOA Section 134(d).
3. Continuous improvement – Create a delivery system that is focused on process improvement and challenges the status quo.
4. Partnership – Align goals, outcomes, and resources with all local partners in the AJCC system to leverage resources to provide a higher quality and level of services.

Definitions

Strategic co-enrollment – Deliberate intentional enrollment in more than one system partner program. Sharing case management, leveraging resources, eliminating duplication of services, and improving participant experiences and outcomes are all made possible through the strong partnerships that characterize strategic co-enrollment. It is intended to be participant centered and provides all necessary services to achieve positive incomes. Coordination should prevent duplication or the supplanting of intensive services. Co-enrollment can streamline the provision of intensive services such as case management, job search assistance, and follow-up services.

System partners – Core and strategic partners that are required by WIOA and the Orange County Comprehensive AJCC Network and Orange County AJCC Partners Memorandum of Understanding (MOU) to be part of the workforce system.

Policy and Procedures

The intent of a co-enrollment is to ensure that needed services are provided through the most appropriate funding stream and to leverage resources for the benefit of the program participant. Co-enrolled services must fall within the scope of allowable activities and services. The intent of co-enrollment is not only to receive enrollment credit for a particular funding stream or to satisfy performance measures of a contract.

An essential component of strategic co-enrollment is identifying when a participant can benefit from being enrolled in more than one partner program at the time of intake. Many partner programs have common eligibility requirements as well as flexibility within their requirements that allow for participants to be co-enrolled.

System partners include local/regional representatives of the following programs:

1. WIOA Title I Adult, Dislocated Worker, and Youth
2. WIOA Title II Adult Education and Literacy
3. WIOA Title III Wagner-Peyser
4. WIOA Title IV Vocational Rehabilitation
5. Carl Perkins Career Technical Education
6. Title V Older Americans Act
7. Job Corps
8. Native American Programs (Section 166)
9. Migrant Seasonal Farmworkers (Section 167)

10. Veterans
11. Youth Build
12. Trade Adjustment Assistance Act
13. Community Services Block Grant
14. Housing & Urban Development
15. Unemployment Compensation
16. Second Chance
17. Temporary Assistance for Needy Families/CalWORKs

Co-enrollment is encouraged in, but not limited to, the following situations:

- Services being offered to the participant reduce barriers to employment and allow full participation in all appropriate programs, including those identified in their career pathway.
- The participant requires services and/or activities from multiple partner programs and can use leveraged resources from the various funding streams.
- The participant is in need of and wants the services identified in the initial or subsequent assessment(s).
- Where applicable, participant meets any eligibility requirements or is able to meet requirements with assistance.
- Identified programs and services are not duplicative and do not supplant any services, the creation of employability plans, training, job placement assistance, or follow-up services.

In order to ensure effective co-enrollment, Service Providers are to ensure:

- Staff are cross-trained and knowledgeable in the functions and basic eligibility requirements of multiple programs;
- Communication is supported between partner programs;
- Information and confidentiality policies/procedures are developed for information sharing and maintaining the data within the case management record;
- Eligibility is determined across programs for co-enrollment, including supportive services;
- Individual Employment Plan (IEP)/Individual Service Plan (ISP), assessments, and other documents are uploaded into CalJOBS and available to partner programs in which participant is co-enrolled; and
- Participant activities and services, placement, and follow-up services are tracked, monitored, and entered into CalJOBS.

Types of co-enrollment

1. Co-enrollment with OCWDB Special Initiative Program – Participant must be enrolled into the Special Initiative program prior to co-enrollment into a Title I WIOA or system partner program.
2. Co-enrollment with OCWDB System Partner
 - The need for co-enrollment must be documented in the IEP/ISP
 - Service Providers must use the OCWDB CalJOBS Referrals Desk Procedure when referring a participant to a system partner.
 - Service Provider must communicate with system partner to ensure intake assessment documents are shared, including IEP/ISPs, to avoid duplication; use the current IEP/ISP, if still valid

3. Co-enrollment with another Local Board – A participant may have been initially enrolled into WIOA in another workforce area
 - Service Provider is to ensure the co-enrollment is reasonable and necessary and that services are not being duplicated.
 - Service Provider must contact the corresponding local board case manager in writing/email to request permission to serve the individual.
 - Service Provider must seek written approval from OCWDB Program Manager to serve the participant.
 - Service Provider must ensure the participant has signed a Release of Information prior to discuss the current IEP/ISP or other relevant items with another Local Board.
 - Service Provider must be able to demonstrate the ability to successfully place the participant in a job that leads to a livable wage according to OCWDB Self-Sufficiency Policy.

4. Co-Enrollment with a Non-OCWDB System Partner
 - Service Provider is to ensure the co-enrollment is reasonable and necessary and that services are not being duplicated.
 - If a non-OCWDB system partner agrees to release information on a shared participant, a confidentiality agreement must be completed and signed by both the Service Provider and non-OCWDB system partner and a Release of Information is in the participant's file.
 - If a non-OCWDB system partner does not agree to share participant information, document the initial referral and status updates of the referral in CalJOBS.

Participant Case File

All documentation relative to participant activities and services, referrals, placement, and follow-up services shall be entered into the participant's hard and electronic case file. Activity code(s) shall be entered into CalJOBS, if applicable. Participant files must be available to federal, state and local monitors for compliance review.

ACTION

Bring this policy to the attention of all staff and relevant parties.

INQUIRIES

If you have any questions regarding this policy, please contact your Contract Administrator at 714-480-6500.