



POLICY

COMMONWEALTH OF KENTUCKY
DEPARTMENT OF WORKFORCE DEVELOPMENT
AND
KENTUCKY WORKFORCE INNOVATION BOARD

POLICY NAME: CO-ENROLLMENT REQUIREMENTS FOR ALL ONE-STOP PARTNERS

POLICY NUMBER: 18-001
DATE OF ISSUE: Reissued March 1, 2023
EFFECTIVE DATE: April 6, 2021

APPLIES/OF INTEREST TO: Kentucky Career Center (KCC) staff, Local Workforce Development Area (LWDA) staff, Trade staff, and One-Stop Partner Agencies.

POINT OF CONTACT: Compliance.Unit@ky.gov

HISTORY: initial date of issue 3/15/2018 superseding policy established 7/1/2015; revised 4/6/2021 with revisions consisting of format change, inclusion of Trade Adjustment Assistance (TAA) in the co-enrollment requirement for WIOA Title I Adult and Dislocated Worker participants, and removal of reference to SNAP, E&T and Medicaid dual-enrollment. Reissued 11/1/2021 with no substantive change (cleanup). Reissued 3/1/2023 with no substantive change, thus effective date remains.

BACKGROUND: Co-enrollment in multiple programs delivers comprehensive services to customers who have barriers to employment. 20 C.F.R §679.560 describes the creation and content of the Local Board's state plan. More specifically, (b)(2)(ii) dictates that Local Boards must describe how they will work with entities carrying out core programs to develop career pathways and co-enrollment, as appropriate.

Coordinating services and eliminating barriers to success early in the process will reduce the likelihood that customers will have to re-enter the public workforce system in the future. WIOA gives states the authority to establish policies and guidelines related to verifying WIOA and Employment Services eligibility as long as the policies are consistent with WIOA, the WIOA regulations, the Wagner-Peyser Act, the Trade Adjustment Assistance Act, among other regulations, and federal statutes.

PURPOSE: The One Workforce System embraces a culture of a united workforce so that a customer may be served by any staff member within a Kentucky Career Center. In order to implement this policy, individuals enrolled in WIOA Title I Adult and Dislocated Worker

Programs must be co-enrolled in both Wagner-Peyser and the Trade Adjustment Assistance (TAA) Programs, if applicable. Although WIOA encourages co-enrollment in all four core programs (i.e., WIOA Title I, Wagner-Peyser, Vocational Rehabilitation and Adult Education) this policy addresses REQUIRED co-enrollment of participants under the WIOA Title I Adult and Dislocated Worker (DW) programs, Wagner-Peyser, and the Trade Adjustment Assistance.

In addition to the USDOL required co-enrollment with the WIOA DW program, based on the needs of the trade-affected worker, co-enrollment can be further enhanced and expanded to include a broad range of services available through other workforce programs in order to produce successful outcomes. Such programs include, but are not limited to, Wagner-Peyser Act Employment Service (ES) activities, WIOA Adult program, WIOA Dislocated Worker Grant (DWG) program, Unemployment Insurance (UI), other WIOA partner programs, faith-based and community-based programs, vocational rehabilitation services, and services for veterans. Partnerships may be facilitated at the state and local board level, as that leadership is deemed vital to the success of co-enrollment.

POLICY: Adults and dislocated workers who receive KCC services other than self-service and informational activities will be co-enrolled in Wagner-Peyser, WIOA, and if eligible Trade Adjustment Assistance through an automated process in the state's official system of record. Staff shall ensure the correct activities are recorded for the respective programs and verify DOB/Vets information in the system of record. Customers will then be co-enrolled and counted in both Wagner-Peyser, WIOA, and if eligible Trade Adjustment Assistance (TAA) performance measures.

Under 20 CFR §680.110(a), registration is the process for collecting information to support a determination of eligibility. Participation occurs after the registration process when the individual receives a staff-assisted WIOA service, which does not include self-service or information activities. Under 20 §CFR §680.110 (b), adults and dislocated workers who receive services funded under Title I other than self-service or informational activities must be registered and must be a participant.

The state has established a standard for paperless co-enrollment registration based on the definition of self-attestation and implemented through the Focus Career system. Once a customer has registered in the Focus Career system, the information is electronically shared and integrated into the system of record. If the customer is receiving services at a Kentucky Career Center, staff should log into the system of record and select the DOB/Vets Verification tab in the Customer Detail module.

As part of the Welcome, Orientation, and Assessment (WOA), staff will verify the customer's DOB and Vets information, if applicable and record any activities that have been completed. An overnight batch process will then look for activities that trigger co-enrollment and the customer will be enrolled in both WIOA, Wagner-Peyser, and if eligible, Trade Adjustment Assistance.

Eligible registrants may access self-service and informational services available at all locations. Customers may not receive any funded career or training services until additional WIOA eligibility documentation has been completed. Staff should check the DOB/VETS Verification tab in the

system of record on prior registered customers who return to any Career Center for services and update the record with proper DOB/VETS information as legacy records will not have complete information. Staff should determine if the current DOB documentation has expired and update as needed. **FAILURE OF THE CUSTOMER TO PROVIDE NEEDED DOCUMENTATION SHALL NOT PRECLUDE DELIVERY OF SERVICES TO THE CUSTOMER.**

TAA Program, WIOA DW, and DWG co-enrollment may provide trade-affected workers with career and supportive services that are not available through the TAA Program. DWG co-enrollment can be used to provide potential trade-affected workers with career, training, and supportive services when state WIOA DW funds are not sufficient to provide such services. Eligible trade-affected workers may receive DWG- funded training only if the available training is not covered by the TAA Program.

DWG and TAA funds must be managed in a coordinated manner to best meet the needs of the trade- affected workers while abiding by all applicable statutes, regulations, and federal policies. The DWG project guidance, TEGL No. 12-19, provides more details on the circumstances for provisions of training.

The Trade Act, as amended, allows states to pay for a training program approved under the Act with TAA funds or from other sources, but does not allow duplication of payment of training costs. (See 20 CFR §618.625.) Under certain circumstances, a state can use funding from more than one program to fund training; however, TAA funds can only reimburse training costs incurred after a trade-affected worker was certified and determined individually eligible for TAA, and that training must be TAA-approved.

Additionally, 20 CFR §618.625(c) requires that the TAA Program be the primary source of assistance to trade-affected workers. To the extent trade-affected workers enrolled in the TAA Program require assistance or services not authorized under the TAA Program, or for which TAA Program funds are unavailable or insufficient (including for required employment and case management services), states must provide such assistance through other federal programs, including programs in the AJC network.

REFERENCE:

- TEGL 12-19
 - TEGL 4-20
 - 20 CFR §618.305
 - 20 CFR §618.325
 - 20 CFR §618.860(i)
 - 20 CFR §618.625
 - 20 CFR §679.560
 - 20 CFR §680.110(a)
 - 20 CFR §680.110 (b)
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