

To: Indiana's Workforce System

From: Indiana Department of Workforce Development (DWD)

Date: April 5, 2024

Subject: DWD Policy 2021-08, Change 1
Co-Enrollment and Common Exit

Purpose

This policy provides guidance for DWD's co-enrollment and common exit strategies. While co-enrollment is not mandated,¹ this strategy is highly encouraged and supported under the Workforce Innovation and Opportunity Act (WIOA) and Indiana's WIOA State Plan.

Common exit is intended to ensure a more efficient and effective integrated service delivery system, track the coordination of services, and align performance reporting. Although co-enrollment and common exit are closely related, not all state and local programs are included in DWD's common exit protocol. DWD's approach to common exit is based on the United States Department of Labor's (DOL) definition with a focus on performance outcomes and federal reporting.

Change 1 Summary

The following changes have been made to this policy:

- **Attachment B** – *Point of Becoming a Reportable Individual, a Participant, and Point of Exit Comparison Among Core Programs* was added;
- TEGL 10-16 references were updated to reflect *Change 2*;
- A footnote has been added to clarify that DWD's case management system determines eligibility, but an individual does not become a program participant until they have received at least one staff-assisted service funded by that program; and
- Definitions and the exit protocol have been updated to better reflect federal guidance.

Rescission

- DWD Policy 2021-08 *Co-Enrollment and Common Exit*
- DWD Memo: *Interim Guidance on the Delivery of WIOA Title I Adult and Dislocated Worker Services and the Impact on Participation and Exit Dates*

References

See **Attachment A**.

¹ Excludes Trade Adjustment Assistance. See DWD's *Trade Adjustment Assistance (TAA) Co-Enrollment in the Workforce Innovation and Opportunity Act (WIOA) Dislocated Worker (DW) Program* policy for additional guidance.

Definitions²

1. **Common exit.** Common exit occurs when a participant, enrolled in multiple partner programs, has not received qualifying, participant-level services from any DOL-administered program in which the participant is enrolled, to which the common exit policy applies, for at least 90 consecutive days, and no future services are scheduled in the MIS.
2. **Exit.** As defined for the purpose of performance calculations, exit is the point at which a participant who has received qualifying services through any WIOA-reporting or ETA-funded program meets the following criteria:
 - (1) For the Adult, Dislocated Worker, and Youth programs authorized under WIOA Title I, Jobs for Veterans State Grants (JVSG) programs, National Dislocated Worker Grant (NDWG) programs, Trade Adjustment Assistance (TAA) programs, and the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA Title III, exit date is the last date of a qualifying, participant-level service preceding 90 consecutive days of no qualifying, participant level services (i.e., staff-assisted or individualized/customized services).
 - a. The last day of qualifying service cannot be determined until at least 90 consecutive days have elapsed since the participant last received participant-level services, with no future services scheduled in the MIS. Qualifying participant-level services do not include self-service, information-only services, or follow-up services.
 - b. All exits are auto-exits. Auto-exits are set by the MIS or case management system retroactively after 90 consecutive days to the last date of qualifying service.
3. **Participant.** For the WIOA Title I Adult, Title I Dislocated Worker, Title II, and Title III programs, a participant is a reportable individual who has received services other than the services described in 20 CFR 677.150(a)(3) (or 34 CFR 463.150(a)(3), as applicable), after satisfying all applicable programmatic requirements for the provision of services, such as eligibility determination.

As set forth in more detail in section 677.150(a)(3) (or 34 CFR 463.150, as applicable), the following individuals are **not** participants:

- Individuals in an AEFLA program who have not completed at least 12 contact hours;
- Individuals who only use the self-service system;
- Individuals who receive information-only services which provide readily available information that does not require an assessment by a staff member of the individual's skills, education, or career objectives.

For the Title I Youth program, a participant is a reportable individual who has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy, and received 1 of the 14 WIOA Youth program elements identified in section 129(c)(2) of WIOA.

² TEGL 10-16, Change 2, Attachment I, *Definitions of Terms Related to the Performance Accountability System* (Definitions 1-5). Applicable definitions exclude guidance pertaining to Vocational Rehabilitation (VR).

4. **Period of participation.** For all performance indicators, except Measurable Skill Gains, a period of participation refers to the period of time beginning when an individual becomes a participant and ending on the participant's date of exit from the program.
5. **Reportable individual.** A reportable individual is an individual who has taken action that demonstrates an intent to use program services and who meets specific reporting criteria of the program, including:
 - 1) Individuals who provide identifying information;
 - 2) Individuals who only use the self-service system; or
 - 3) Individuals who only receive information-only services.

NOTE: See Attachment B for clarification on “when” a participant becomes a reportable individual, a program participant, and when the exit occurs for programs.

6. **Self-service.**³ Self-service occurs when individuals independently access any workforce development system program's information and services in either a physical location, such as a one-stop center resource room or partner agency, or remotely via the use of electronic technologies.

Self-service does not uniformly apply to all virtually accessed services. For example, virtually accessed services that provide a level of support beyond independent job or information seeking on the part of an individual would not qualify as self-service.

7. **Strategic co-enrollment.** Strategic co-enrollment is encouraged by DWD to ensure high-quality service delivery. It is customer-centered and should be driven by the individual's unique barriers to employment. Strategic co-enrollment ensures the participant receives all appropriate services needed for positive outcomes. The need for strategic co-enrollment can be established through any of the following service strategies:
 - Participant interview;
 - Assessment;
 - Partner referral;
 - Career planning and/or research; or
 - Any other method through which staff can obtain enough information to establish program eligibility and the need for services offered by partner programs.

Service strategies and documentation used to determine program eligibility for co-enrollment must be maintained in DWD's case management system.

Content

WIOA places a strong emphasis on planning across multiple partner programs to ensure alignment in service delivery. A shared workforce development service delivery system is established through the development and execution of partner MOUs and the selection of One-Stop Operators to coordinate the

³ 20 CFR 677.150.

delivery of program services. This shared delivery system creates the foundation on which co-enrollment strategies can be refined to meet the needs of local employers and job seekers.

Indiana's strategic co-enrollment approach facilitates service delivery alignment and encourages the braiding of resources to address the training and employment needs of job seekers and business customers at the local level.

Expanding co-enrollment efforts will serve to maximize the efficiency and impact of each program through responsible stewardship of funds. Ensuring that individuals are being served through the programs most appropriate for their needs can lead to a reduction in the duplication of services, improved outcomes, and an increase in the number of participants served through each funding stream.

Benefits of Co-Enrollment

DWD recognizes the many advantages of strategically co-enrolling participants into appropriate partner programs.

- **Additional resources to provide training and income support:** Co-enrolling participants in more than one eligible program may provide them with additional training and income support and wraparound resources, thus reducing potential out-of-pocket costs or direct expenses from seeking additional education and training for career advancement.
- **Enhanced service delivery:** Co-enrollment in WIOA and/or other programs can provide eligible participants with access to a wide array of vitally important services that both directly and indirectly impact the availability of the opportunities to develop knowledge and skills for career advancement.
- **Improved participant outcomes:** By braiding the various funding streams for training and income support dollars; providers increase their capacity for counseling, case management, wraparound support, and follow-up services, leading to greater performance outcomes.
- **Increased services:** Co-enrolled participants may gain access to both greater breadth and depth of supportive services, like childcare and transportation, as well as more varied opportunities for education and training, which may not be currently covered because of funding limitations. By pooling various funding streams in a coordinated manner, providers can stretch their dollars further.

When Is Co-Enrollment Appropriate?

When determining if co-enrollment is appropriate for a participant, consider the following:

- Is the participant eligible⁴ for and in need of partner program services?
- Will partner program services help reduce the participant's barriers to employment or otherwise benefit the participant?
- Does the participant want and has agreed to receiving partner program services?

⁴ DWD's case management system determines all programs for which individuals are eligible. However, program participation does not commence until and unless the individual receives staff-assisted services funded by that program.

- Will co-enrollment improve outcomes for the participant and/or help them meet their employment goals?
- Will co-enrollment reduce duplicative service provision?

Mandated Co-Enrollment

Trade Adjustment Assistance (TAA)⁵

All TAA participants that are also WIOA Dislocated Worker (DW) eligible must be co-enrolled in the WIOA DW Program. Services from other programs must be made available to the trade-affected worker. Wagner-Peyser, Vocational Rehabilitation, veterans' programs, and other one-stop partner program services should be provided to TAA participants as appropriate.

Common Exit

DWD has established a common exit protocol within DWD's case management system. Programs that are subject to the protocol are listed in the table below:

Programs Subject to Common Exit
WIOA Title I (Adult, Dislocated Worker, and Youth)
National Dislocated Worker Grants (NDWG)
WIOA Title III (Wagner-Peyser)
Jobs for Veterans State Grants (JVSG)
Trade Adjustment Assistance (TAA)

The system's common exit protocol requires that an individual who is co-enrolled in one or more of the above programs will not exit (and will be counted in performance) until they are no longer being served by any of those programs for 90 days and there are no future services planned.

Exit occurs **automatically** based on actual or projected end dates of reported services. **Staff must not have any ability to alter or change exit dates, and staff cannot override the case management decision.** Additionally, staff cannot deny services even if a participant is past their exit date. In alignment with data validation, staff must enter a case note dated the same as the last service into DWD's case management system.

Action

Local areas must develop local co-enrollment policies and procedures that are aligned with this policy. Local areas must also implement staff training that includes eligibility, required eligibility documentation, data validation requirements, and services available through the partner programs for which they intend to co-enroll.

Implementation of this policy is subject to routine WIOA monitoring.

⁵ Please see DWD's *Trade Adjustment Assistance (TAA) Co-Enrollment in the Workforce Innovation and Opportunity Act (WIOA) Dislocated Worker (DW) Program* policy for more information.

Attachments

- **Attachment A** – References
- **Attachment B** - Point of Becoming a Reportable Individual, a Participant, and Point of Exit Comparison Among Core Programs

Effective Date

Immediately

Ending Date

Upon rescission.

Additional Information

Questions regarding the content of this publication should be directed to policy@dwd.in.gov.

Attachment A References

- WIOA Section 129
- 20 CFR 677.150
- 34 CFR 463.150
- 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*
- DWD Policy 2020-06, Change 1 *Trade Adjustment Assistance (TAA) Co-Enrollment in the Workforce Innovation and Opportunity Act (WIOA) Dislocated Worker (DW) Program*

Attachment B
Point of Becoming a Reportable Individual, a Participant and
Point of Exit Comparison Among Core Programs⁶

Program	Point of being a Reportable Individual	Point of Being a Participant	Point of Exit (No Co-Enrollment)	Point of Exit (Co-Enrollment/ Common Exit)
Title I Adult and Dislocated Worker	Shows intent to use program AND <ul style="list-style-type: none"> • Provides identifying information; and • Uses only self-service or informational services. 	Determined eligible AND has received at least one WIOA Title I Adult or Dislocated Worker service.	Last date of service. Determined 90 days after receiving no services ⁷ and there are no future services planned. The date is applied retroactively to the last date of service.	Last date of service. Determined when the participant is no longer being served by any of the programs subject to DWD's common exit protocol for 90 days and there are no future services planned. The date is applied retroactively to the last date of service.
Title I Youth	Same as Title I Adult and Dislocated Worker.	Determined eligible AND receives at least one WIOA Title I Youth service.	Same as Title I Adult and Dislocated Worker.	Same as Title I Adult and Dislocated Worker.
Title III Wagner-Peyser	Same as Title I Adult and Dislocated Worker.	Reportable individuals who have received at least one staff- assisted employment service.	Same as Title I Adult and Dislocated Worker.	Same as Title I Adult and Dislocated Worker.

⁶ Excludes Vocational Rehabilitation requirements.

⁷ Does not include self-service, information-only services, or follow-up services.