



ANNE ARUNDEL  
WORKFORCE DEVELOPMENT  
CORPORATION

Policy and Procedure Memorandum 2018-AJC-05

Co-Enrollment – Effective July 1, 2017

**TO:** Anne Arundel Workforce Development Corporation (AAWDC) staff

**FROM:** Kirkland Murray  
President and CEO  
Anne Arundel Workforce Development Corporation

**SUBJECT:** Co-enrollment Between AAWDC Initiatives

**PURPOSE:** To provide guidance to AAWDC leadership and staff on the policies and procedures for co-enrolling participants into multiple AAWDC initiatives.

**ACTIONS:** Directors will ensure that all employees are educated on and have received copies of this policy. All AAWDC PPMs shall be posted on the Shared drive.

**EXPIRATION:** N/A

**QUESTIONS:** Deborah Russell  
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**CANCELLATIONS**

This policy supersedes and replaces any local conventions in effect by any AAWDC program or administrative entity.

AAWDC Approvals

 Office of Research, Performance and Compliance  
 Fiscal Office  
 Program Director  
 President and CEO  
 Workforce Development Board

### ***General Information***

One of the hallmark principles of the Workforce Innovation and Opportunity Act (WIOA) is to streamline services in order to promote efficiency and optimize performance. This can often be accomplished by leveraging the resources of multiple Partners or AAWDC initiatives. The process of utilizing multiple grants, initiatives, or Partner agencies to provide services to a single participant is called co-enrollment. The U.S. Department of Labor encourages co-enrollment through WIOA in various ways, including common exit requirements, common performance metrics, and the requirement to coordinate service delivery amongst Partner agencies to reduce duplication of services.

Within the Anne Arundel County Workforce Development Area, the Anne Arundel County Local Workforce Development Board (Board) has created a Career Center workgroup. The Career Center workgroup is part of the Alignment Committee and consists of the Partners co-located within the Anne Arundel County Career Centers. Current partners include:

- Maryland Department of Labor, Licensing and Regulation (DLLR)
- Maryland State Department of Education, Division of Rehabilitation Services (DORS)
- Anne Arundel County Department of Social Services (DSS)
- Anne Arundel Community College (AACC)
- Anne Arundel Workforce Development Corporation (AAWDC)

The workgroup is responsible for implementing a customer-centric designed service model. Co-enrollment is a vital part of this model. As such, the Career Center workgroup oversees the joint delivery of certain services and assists the Partner agencies in coordinating services between Partners.

### ***Co-Enrollment Policy***

#### **General**

For purposes of this policy, co-enrollment is defined as enrollment in two or more WIOA Title I funding streams, and/or special grant programs operated through AAWDC. Co-enrollments will be used to leverage resources that are available to ensure a positive outcome for the participant. Coordination of co-enrollment will eliminate the duplication of services conducted by various AAWDC Initiatives and reduce the amount of time staff spends providing such services.

Consistent with WIOA's emphasis on beneficial co-enrollment, it is the participant who is to benefit, not the organization. AAWDC's customer-centric model works best when staff are encouraged to develop and pursue strategies that directly benefit the client and lead to positive outcomes. Enrolling participants for the sole purpose of achieving metric outcomes does not achieve this. Therefore, co-enrollment for achievement of program or performance metrics is NOT allowed.

#### **WIOA-Specific Considerations**

Within the various streams of WIOA Title I funding (Adult, Dislocated Worker, and Youth), the following guidelines must be followed:

- If a participant qualifies for enrollment into the Dislocated Worker and is deemed suitable for the WIOA initiative, then the participant must be enrolled as a Dislocated Worker.
- As all unemployed Dislocated Workers are, by definition, Adult Workers, AAWDC may, at its discretion, co-enroll unemployed Dislocated Workers as Adult Workers.
- Co-enrolled Dislocated Workers shall count in the federal performance metrics of both the Adult and Dislocated Worker program.

### ***Performance Accountability***

When utilizing co-enrollment as a strategy, the Office of Research, Performance and Compliance (RPC Office) has established the following case management guidelines:

1. Coordination must occur between Initiatives prior to co-enrollment. This coordination must continue to occur during the participant's enrollment in multiple Initiatives. The RPC Office is willing to facilitate this coordination,



but the responsibility remains on case management staff in the various co-enrolled initiatives to ensure that all case management standards are met.

2. There will be one primary case manager who is associated with the initial enrolling program, unless other accommodations are made and documented.
3. The primary case manager will be responsible for service and activity coordination amongst the various co-enrolling initiatives. This includes ensuring adequate documentation of service delivery in the Maryland Workforce Exchange (MWE) or similar MIS system, the participant's master file, and responsibility for completing and updating the participant's Individual Employment Plan (IEP).
4. Training services and limits will be enforced at all times. In general, funding for training will only be charged against one initiative. Training caps, limits, and rules for the charged initiative will apply to the co-enrolled participant. If training is to be funded by multiple initiatives, sufficient documentation must be included in the participant's file to justify this decision. Such reasons could include career progression, skills progression, various types of training (i.e. occupational training vs. OJT), etc.
5. The primary case manager is responsible for recording performance outcomes in the MWE system or similar MIS system.

### ***Reporting and Monitoring***

For purposes of grant reporting, a participant must be reported as a participant in all grants into which he or she is co-enrolled. Therefore, each initiative is held accountable for meeting the performance requirements of the grant. However, training services and supportive services will only be countable to the grant which is charged for the service. Any performance outcomes that are tied to training and/or supportive services will be only countable by that grant.

For WIOA internal reporting purposes, Dislocated Workers who are co-enrolled as Adults will only count as Dislocated Workers.

Because service coordination poses a higher risk of non-compliance, the Office of Research, Performance, and Compliance will maintain a list of co-enrolled participants and initiatives must receive permission from a compliance staff member to close and exit a participant from a program.