

PUBLIC POLICY: NO. WIOA-04-2024**DATE: AUGUST 12, 2024****ASUNTO: POLICY AND PROCEDURES FOR CONCURRENT PARTICIPATION OF CLIENTS IN PARTNER PROGRAMS OF THE WORKFORCE DEVELOPMENT SYSTEM****REFERENCE: WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)****I. INTRODUCTION**

The Workforce Innovation and Opportunity Act (WIOA) offers a broad range of workforce development activities designed to help job seekers and workers access new employment, education, training, and support services. The goal is to succeed in the labor market and connect employers with qualified job seekers necessary to compete in the global economy.

II. PURPOSE

This policy outlines the concurrent participation process (co-enrollment) for participants in different programs, according to eligibility, as a method to provide effective service by combining the WIOA programs offered at One-Stop Career Centers or American Job Centers (AJC).

III. LEGAL BASE

- Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128, July 22, 2014, sections 3 and 134(c)(3)(E).
- WIOA-PP-03-2024: Policy and Procedures for Concurrent Participation of Clients in Partner Programs of the Workforce Development System.
- Law to Establish the Film Industry Development Program, the Youth Development Program, and the Workforce Development and Training Program (Law No. 171 of October 2, 2014, as amended).
- Puerto Rico Municipal Code (Law No. 107 of August 14, 2020, as amended).
- TEGP No. 07-20: "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).
- TEGP No. 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).
- TEGP No. 04-15 "Vision for the One-Stop Delivery System under the Workforce Innovation and Opportunity Act (WIOA)" (August 13, 2017).

- TEGL No. 10-16, Change 2: “Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs” (September 15, 2022).
- TEGL No. 07-18: “Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)” (December 19, 2018).
- TEGL 23-19, Change 1: “Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs” (October 25, 2022).
- TEGL 23-19, Change 2: Revisions to Training and Employment Guidance Letter (TEGL) 23-19, Change 1, Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs (May 12, 2023).
- TEGL 11-11, Change 1 “Selective Service Registration Requirements for Employment and Training Administration Funded Programs, (January 20, 2012).
- TEGL 11-11, Change 2 “Selective Service Registration Requirements for Employment and Training Administration Funded Programs, (May 16, 2012).
- TEGL NO. 10-09: “Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in whole or in part the U.S. Department of Labor (DOL)” (November 10, 2009).
- TEGL 21-16 – Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance (March 2, 2017).

IV. PUBLIC POLICY

The service network at One-Stop Career Centers or American Job Centers (AJC) should encourage concurrent or simultaneous participation with other programs that complement or enhance those services, rather than duplicating them. Establishing concurrent participation models will enhance the efficient use of system resources for the benefit of the participant

A. Programs for Concurrent Participation

The services offered to participants by different programs should be part of the permitted activities and services. Many of the associated programs have common eligibility requirements and have some flexibility within those requirements, allowing participants to participate concurrently. The programs identified for this concurrent participation are as follows:

- a) Title I Programs (Youth, Adults, and Dislocated Workers);
- b) Adult Education and Literacy Activities (Title II);
- c) Employment Service (Wagner-Peyser) of Title III;
- d) Reemployment Services and Eligibility Assessments;
- e) Vocational Rehabilitation Services (Title IV);
- f) Unemployment Insurance (UI);

- g) Vocational and Technical Education (Carl D. Perkins Career and Technical Education Act);
- h) Youth Build Program;
- i) Senior Community Service Employment Program (SCSEP);
- j) Jobs for Veterans State Grants (JVSG);
- k) Migrant and Seasonal Farmworker Program (MSFW);
- l) Temporary Assistance for Needy Families (TANF);
- m) Nutritional Assistance Program (PAN);
- n) Trade Adjustment Assistance Program (TAA).

In addition to coordination with core and required partners, coordination can also be established with other agencies, community-based organizations, placement agencies, among others. These partners collaborate to offer a wide range of services aimed at helping participants achieve their employment and professional goals.

Types of benefits that complement WIOA core programs:

The types of services that can be coordinated with WIOA workforce development system partners include, but are not limited to:

- a) **Placement Services:** Facilitates workers in finding employment and employers in filling vacancies.
- b) **Guidance and Vocational Counseling Services:** Provides participants with information and guidance on career options, training, and education requirements to achieve professional goals. This may include interviews with mentors and tutoring services.
- c) **Soft Skills Training:** Offers programs that develop soft skills such as time management, conflict resolution, and communication, thereby improving teamwork or problem-solving in work environments.
- d) **Training Services:** Provides training and education programs to develop skills and competencies in workers, facilitating their employability and professional advancement in high-demand occupational areas in the labor market.
- e) **Entrepreneurial Training Programs:** Teaches individuals how to manage and maintain a business, including market opportunity identification, market research, and the creation and management of successful businesses.
- f) **Financial Assistance Services:** Helps workers and employers obtain financing for ventures and projects through grants, loans, and other resources.
- g) **Job Search Assistance:** Provides resources and tools to help workers in job searching and application, including assistance in preparing resumes, cover letters for interviews.
- h) **Support Services:** Offers services such as childcare and eldercare, transportation, and meals to help individuals attend interviews and events relevant to job search, facilitating their training and participation.

- i) **Assistance Services for People with Disabilities:** Provides guidance and support to help people with disabilities find and maintain jobs that match their skills and professional goals.

B. Key Elements for Service Coordination

Effective coordination within the AJC network is essential to ensure that concurrent participations adequately meet client needs and avoid duplication of services. It is crucial that it is always clear what services are being offered and by whom.

An important aspect of this coordination is the development of an Employment Plan/Service Strategy. By enrolling participants in multiple programs, staff gain greater flexibility to fund and share responsibility for the services needed to help participants achieve their goals and objectives while participating in the programs.

This coordination will encompass the following aspects:

- a) **Cross-Training:** Staff must be trained to understand the roles and basic eligibility requirements of the various programs.
- b) **Policy/Procedure Development:** Policies and procedures must be established to share information, ensure confidentiality, and maintain data within the Participant Record Information System (PRIS).
- c) **Previous Record Verification:** When registering a client, it should be determined if they are already registered in another program.
- d) **Program Referrals:** If a client is registered in another WIOA program, any concurrent participation will be discussed first with the person designated in the AJC. Additionally, if an AJC seeks to refer a client to another program, the possibility of concurrent participation will be discussed with the associated program or service provider. All information related to concurrent participation will be documented in the PRIS system.
- e) **Activity Control and Supervision:** Participants' activities and services, as well as placement and follow-up services, will be controlled, supervised, and documented.
- f) **Documentation and Document Availability:** The Individual Employment Plan (IEP)/Individual Service Strategy (ISS), assessment, and other documents will be uploaded to the PRIS and will be available to the associated programs in which the participant is concurrently enrolled.

C. Situations in Which Concurrent Participation is Promoted

The following are examples, but not limited to:

- When the services offered to the participant remove barriers to employment and facilitate their full participation in all programs, including those identified in their career path.
- When the participant requires and has accepted to receive services from multiple partner programs and can benefit from the combined use of resources from different funding sources.

- When the participant meets the eligibility requirements of the different programs.
- When the identified programs and services do not duplicate or replace any existing service, such as employability plan development, training, job placement assistance, or follow-up services.

D. Functions and Responsibilities of the Components of the Single Management System.

1. **Local Boards:** Local Boards are responsible for identifying and overseeing AJC operators and selecting service providers in the AJC. Local Boards must collaborate with partners to increase service integration as appropriate based on the needs of the Local Area.
2. **CGU/AJC Operators:** AJC operators in local areas must support concurrent participation by supporting the integration of service delivery within the AJC system. This includes maintaining standards and accountability, promoting consistent, coordinated, and quality services, supporting communication within the AJC and among partners, and providing staff training across all partner agencies.
3. **Service Providers:** Service providers will support concurrent participation through collaboration either with the partners identified in the AJC or on their own.
4. **CGU/AJC Partners:** Each partner must ensure that its service delivery, coordination, and case management component is synchronized with other partners and that there is an effective communication system. The following points describe the responsibilities of the partners:
 - ✓ Develop information and confidentiality policies/procedures to share information and maintain data within the case management record.
 - ✓ Determine eligibility for all programs for concurrent participation, including support services.
 - ✓ Refer participants when appropriate – Track and monitor participants' activities and services, placement, and follow-up services, and enter information into case management systems.
 - ✓ Provide sufficient documentation in the participant's file.

E. Procedure for Concurrent Participation:

1. Identification, Eligibility and Referrals:

In the first step, a staff member will conduct a verbal assessment to determine the individual's eligibility for Titles I and III of the WIOA Act that address employment barriers, establish service priority, and identify if there is a disability that requires more resources. Based on this assessment, the AJC staff offers guidance on the next appropriate steps. WIOA programs that target similar demographic groups should require concurrent participation when appropriate for the participant.

A key component of strategic concurrent participation is identifying when a participant who comes to the AJC can benefit from being enrolled in more than one partner program at the time of admission. Many partner programs have common eligibility requirements, as well as flexibility within their requirements that allow participants to be jointly enrolled.

The primary service provider will coordinate activities and ensure that all services are documented in the client's case notes and Individual Employment Plan (IEP). AJC staff must be trained and cross-trained on the roles and basic eligibility requirements of multiple programs. AJC staff will be able to adequately assist participants and make informed referrals to associated programs as needed.

This referral process may include authorization to disclose information that allows partners to share and enter information into their respective case management systems.

2. Registration Process:

After the initial assessment, the individual may participate in the partner programs that best suit their needs and eligibility. Ultimately, the goal is to formulate a specific plan for each individual's needs that can lead to self-sufficient employment.

Co-registration:

In the context of this policy, co-registration implies that participant data is shared and stored in a single centralized database, where all partners have access and can update the information.

Partners can collaborate to develop a universal admission/registration application that can be used by all partners to assess eligibility for multiple programs, enroll when possible, and make useful referrals.

For example, this involves reducing the paperwork that a person must complete during admission, streamlining data sharing and tracking referrals and outcomes, and helping individuals with multiple barriers access coordinated services more effectively.

Concurrent participation without co-registration:

All associated programs must use the PRIS system to document information related to the concurrent participation of AJC clients. In the system, partners will be able to see the entirety of the services offered to an individual, including the dates and times services were received. AJC operators must coordinate a communication strategy with any partner that does not use the PRIS system to capture and record participation and ensure no duplication of services.

There will be an AJC or primary service provider that enrolls the participant. Typically, this will be the first service provider in which they enroll.

3. Follow-up:

Programs will coordinate the primary responsibility for follow-up and obtain programmatic data information.

- Placement information will be shared among AJCs. The primary service provider will enter the results into the PRIS.
- Exit decisions must be coordinated within the AJC and with the partners that report to the DOL. Only one service provider can be the "exit" agency.
- Follow-up activities and services will be coordinated between both service providers.

4. Reporting Procedures in the PRIS:

The PRIS system records and tracks data, services, history, and results of clients registered in WIOA and other special grant programs. This information is crucial for both state and local performance measures.

A registration form must be submitted for each funding source. Before a client participates in another program, the PRIS will notify staff about another enrollment or registration. The previously discussed coordination must occur before concurrent participation is completed. Subsequent entries in the PRIS must be completed while coordinating services. Only one exit form can be submitted.

Placement information will be shared among AJC partners. Exit decisions must be coordinated within the AJC and with associated programs. Only one partner can act as the "exit" agency. Follow-up activities and services will be coordinated among associated programs.

5. Execution Measures:

Clients with concurrent participation will be counted in the performance measures for all grants in which they are registered. The standardization of WIOA performance indicators introduces the ability to "share" performance among core programs, allowing multiple core programs to take credit for jointly enrolled participants.

For example, if a participant is registered in Title IV of Vocational Rehabilitation, both programs can take credit for performance for achieving a recognized credential, which was obtained by attending Title IV-funded training. For Title I programs, staff must enter performance information (credentials, measurable skills gains, etc.) received through other core programs into the PRIS system to ensure that credit is received for performance.

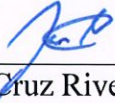
V. EFFECTIVE DATE

This Public Policy will be effective upon approval by the Members of the Local Board and the Board of Directors of Mayors of the Local Workforce Development Area Manati – Dorado

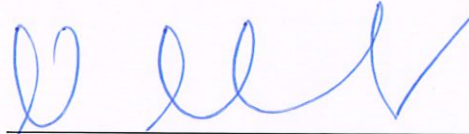
VI. APPROVAL AND VALIDITY

Public Policy No. WIOA-04-2024 "Policy and Procedures for Concurrent Participation of Clients in Partner Programs of the Workforce Development System.

In Vega Alta, Puerto Rico on August 12, 2024.



Josue Cruz Rivera
President
Local Workforce Development Board



Hon. Maria M. Vega Pagan
President
Board of Directors of Mayors

Note: This document uses the masculine gender to refer to both genders to facilitate reading. This writing style is not intended to imply the supremacy of one gender over another.