

# CO-ENROLLMENT

## ABOUT THIS SERIES

The stated purpose of the federal Workforce Innovation and Opportunity Act (WIOA) is “to strengthen the United States workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the United States, and to promote individual and national economic growth.” Through this series of briefs on key equity levers in WIOA, World Education, Inc. (WEI) provides analysis of WIOA quantitative data 2016-2019 and recommendations for WIOA reauthorization on five key topics:

- **CO-ENROLLMENT**
- **CO-INVESTMENT**
- **CAREER PATHWAYS**
- **PERFORMANCE ACCOUNTABILITY**
- **SYSTEM INTEGRATION**

The goal of the series is to inform policy makers and other key stakeholders on WIOA outcomes to date and present options for increasing the efficacy of the WIOA legislation to promote equity.

The term 'co-enrollment' as used in this brief refers specifically to simultaneous enrollment in more than one of the Workforce Innovation and Opportunity Act (WIOA) six core programs:

- **Title I** Adult
- **Title II** Adult Education and Family Literacy
- **Title I** Youth
- **Title III** Wagner-Peyser
- **Title I** Dislocated Worker
- **Title IV** Vocational Rehabilitation Services

WIOA does not define co-enrollment, but does require state reporting of participants who received services under more than one core WIOA program. A 2017 joint U.S. Department of Education and Labor webinar<sup>1</sup> discussed the purpose of co-enrollment as a route “to better develop an understanding of which programs are necessary for participant success and advancement toward their career and educational goals,” without describing how co-enrollment would indicate this. In response to a question, webinar presenters provided direction on reporting and performance— noting that a co-enrolled individual’s performance gains are reported in ALL systems in which that individual is enrolled, not divided up based on funds spent or services provided. This webinar transcript remains the only federal guidance to the field to date on how co-enrollment is to be understood and evaluated.

In 2018, in response to state questions on co-enrollment, a federal technical assistance project<sup>2</sup> was conducted to enable a cohort of states to develop individual state plans. One of those states, California, went on to create their state co-enrollment directive<sup>3</sup> that includes public benefit programs in addition to the six WIOA core programs. The California directive provides both a strong definition and clear purpose for co-enrollment to increase program and participant success,

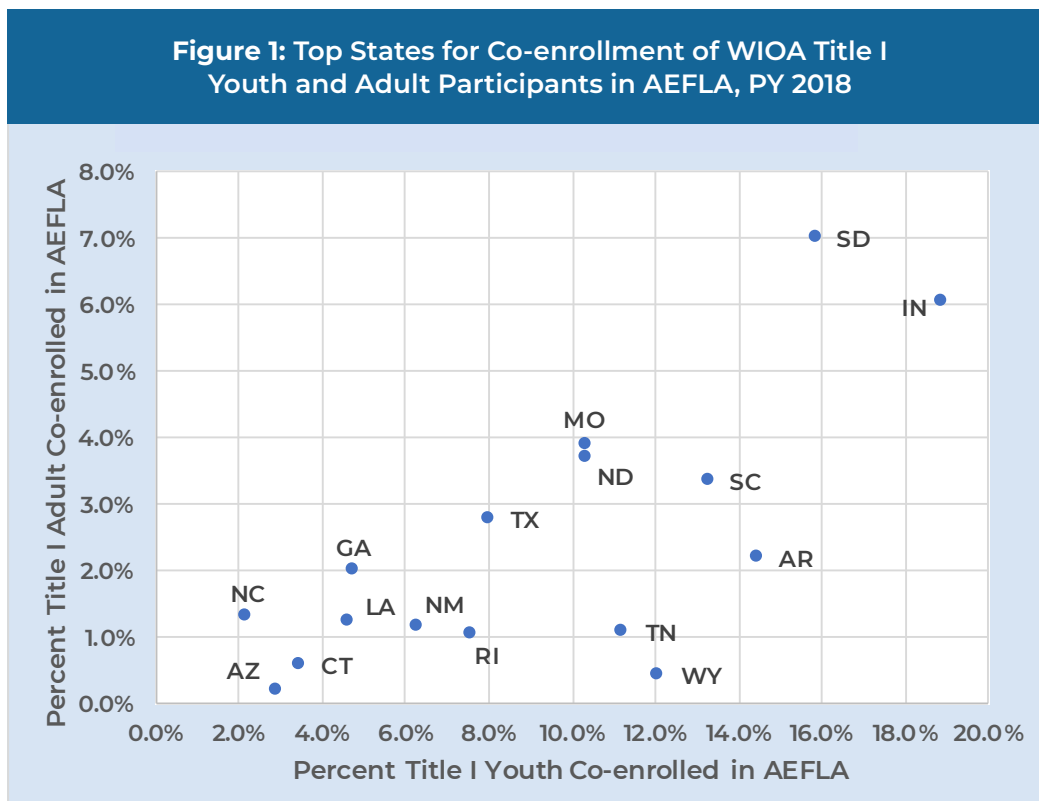
maximize resources, enable greater efficiencies in service delivery, and align services with regional sector pathways. The directive also notes the power of co-enrollment: “By braiding resources and realigning program service delivery models, we can redefine participant flow and facilitate access to comprehensive services.”

## WIOA QUANTITATIVE REPORTING

WEI’s analysis of co-enrollment focused on the extent to which states are utilizing co-enrollment of WIOA Title II Adult Education and Family Literacy Act (AEFLA) participants with other WIOA core partners to provide holistic, human-centered career and training services, particularly with WIOA Title I out-of-school youth and WIOA Title I Adult participants.

The AEFLA summary data reporting indicates that 5.9 percent of AEFLA participants were enrolled in another WIOA title in PY 2017, and 6.2 percent were in PY 2018. However, this data is greatly underreported, with only 25 of the 57 states and territories reporting any co-enrollments in PY 2017, and only 22 states and territories reporting in PY 2018.

WEI also analyzed summary data on co-enrollments of WIOA Title I Youth and Title I Adults in AEFLA. The data was drawn from the Performance Accountability, Information, and Reporting (PIRL) system, the individual participant records submitted by the states to U.S. Department of Labor on a quarterly basis, which contain variables on the enrollment of participants in all WIOA Titles. This data indicates that only about 3.2 percent of WIOA Title I Youth were co-enrolled in AEFLA nationally, and just 0.6 percent of WIOA Title I Adults were co-enrolled in AEFLA, even though AEFLA participants are a priority-of-service population for the WIOA Title I Adult program. These co-enrollment percentages vary substantially across states, with 11 states co-enrolling more than 6 percent of their Title I Youth participants in AEFLA, and five states enrolling more than 3 percent of their Title I Adult participant in AEFLA. See **Figure 1**.



Co-enrollment, the leveraging of the education and workforce development partner services to holistically meet the needs of program participants, was to be the hallmark of WIOA career pathways. Why isn't it happening? While Congressional intent embedded equity into the law, subsequent siloed rule-making, lack of guidance, and calcified practices have kept that intent from becoming reality.

Specifically, two WIOA equity strategies remain largely unfulfilled:

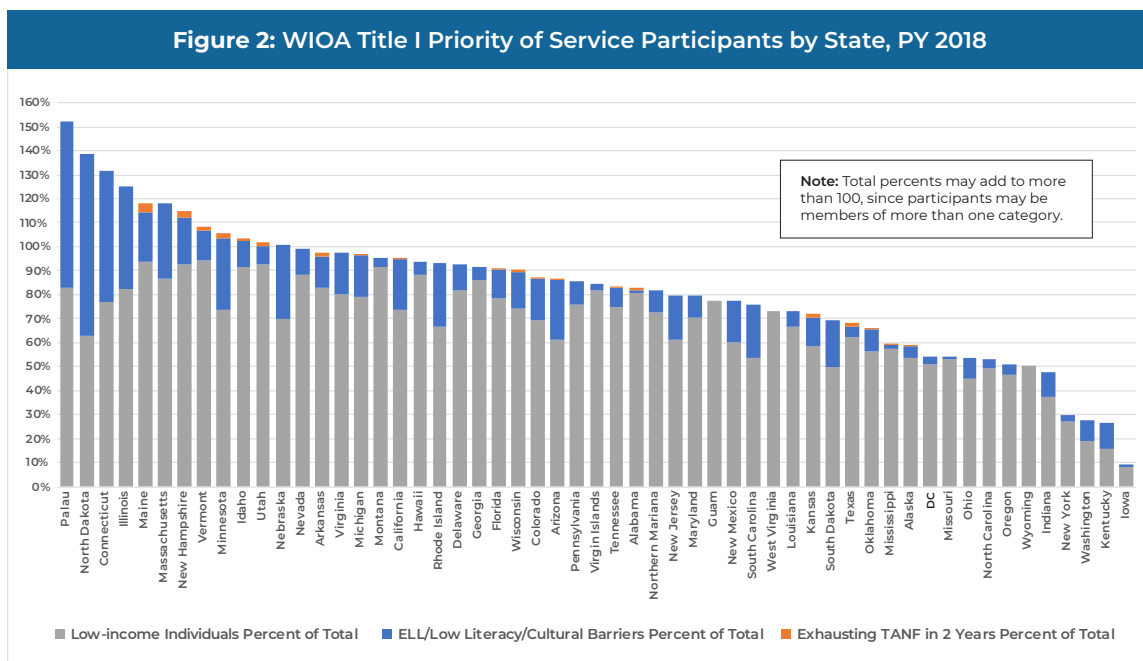
## WIOA TITLE I Youth

First is the critical requirement to turn the WIOA Title I Youth program toward the out-of-school youth (OSY) population. WIOA requires 75% of WIOA Title I Youth funding to be spent on OSY. However, many WIOA 2020 plans include OSY waiver requests, allowing states to opt out of building partnerships with community organizations and public benefit programs to serve OSY and instead focus on providing career exposure only through K12 partnerships. While a number of exemplar communities are building partnerships to serve more OSY and serve them well, the year-over-year granting of waivers without consequences means that some states are able to disregard the WIOA mandate to address the needs of their least-well-served youth populations.

## WIOA TITLE I Adult

The second largely ignored equity strategy is the WIOA Title I Adult priority-of-service mandate, which focuses funds on three key populations: "recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners)." WIOA closed a loophole in the previous legislation that allowed states to use the "limited funding" rationale to avoid prioritizing these populations, but the data reveals little effort by states to push beyond "low-income" as a target population. **Figure 2** illustrates this point using data on percentages of low-income individuals, individuals who are English learners or have low literacy, and Temporary Aid to Needy Families (TANF) recipients by state/territory for PY 2018.

Similarly, recent Department of Labor guidance<sup>4</sup> sets an expectation that states will dedicate 75% of WIOA Title I adult funds for priority of service populations, but WIOA 2020 plans<sup>5</sup> reveal little intent to move beyond 51%.



## RECOMMENDATIONS

As the WIOA legislation comes due for reauthorization, policy makers need to amend it to strengthen definitions, close loopholes, and provide joint guidance and incentives in order to ensure that its intended equity outcomes are realized.

**First, provide a definition of co-enrollment** that supports each state's strategic plan, whether that is a unified plan—the minimum requirement to include the six WIOA core partners—or a combined plan (see box below for a sample definition of strategic co-enrollment). States that have taken up the combined plan option are creating equity strategies with Perkins Career and Technical Education (CTE) partners, community colleges, Temporary Assistance to Needy Families (TANF) partners, Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T) partners, and other entities in the list of “required one-stop partners” in WIOA Section 121(b)(1)(B), and they should be rewarded for developing and implementing these co-enrollment strategies.

**Second, align definitions of the two key WIOA activities:** career services and training services. As it now stands, the joint performance accountability guidance documents from the Departments of Labor<sup>6</sup> and Education<sup>7</sup> describe the same activity—for instance, participation in adult education—in two different ways and limit shared accountability through different interpretations of activities across the titles. This creates unnecessary barriers for states seeking to serve their youth and adults with equity strategies that align with WIOA's equity mandates.

**Strategic co-enrollment** – Intentional enrollment in more than one WIOA Plan Partner program, as defined in a state's WIOA Unified or Combined Plan. Shared case management, leveraged resources, and improved participant experiences and outcomes are made possible through the strong partnerships that characterize strategic co-enrollment. Strategic co-enrollment is participant centered and provides all necessary services to achieve positive outcomes. Coordination should prevent duplication or the supplanting of intensive services.

## ADDITIONAL RECOMMENDATIONS FOR WIOA REAUTHORIZATION

### For core partners:

- Eliminate OSY waivers and provide guidance and incentives to help local providers “find” and serve the OSY population in their communities through partnerships with TANF, SNAP E&T, and more.
- Codify 75% for Title I Adult priority of service populations AND set a target percent of funds for training services. Too many local areas use WIOA Title I Adult funds for infrastructure rather than service delivery. A priority-of-service target is needed, but it is useless without a target for percent of funds used for career and training services within the Title I Adult program.
- Produce joint U.S. Departments of Education and Labor guidance clearly detailing how co-enrollment is “counted” in WIOA performance.
- Provide incentive funding for co-enrollment. WIOA ended the incentive funding structure that seeded many of the career pathway innovations that were built into the legislation. A reauthorized WIOA should include an incentive funding structure completely built on providing effective services to those community members who are most in need of public education and workforce development programs.

## For broader partners:

- Provide guidance specifically for serving shared populations such as the expanded Perkins CTE low-income adults and public benefit recipients (e.g., TANF, SNAP E&T).
- Support adult education and postsecondary education dual enrollment through active promotion of the Higher Education Act Ability to Benefit provision.

## Confronting Barriers

### Barriers To Success

WIOA seeks to direct services to those most in need in local communities through disaggregated reporting to a category of people deemed “individuals with barriers to employment.” This prioritizing of public resources is a laudable goal and the list of barriers is comprehensive and derived from data demonstrating the relationship between a barrier and unemployment rates. However, the characterization of the individual as containing the barrier is counterproductive in designing the very workforce development interventions needed to address those barriers, only some of which are temporary and situational, like homelessness. Further, this deficit-based framing disrespects those we serve and further taints the WIOA system and WIOA system participants as being individuals in need of fixing, with the “fix” frequently being placement in a low-quality job and an ‘exit’ from services.

### Recognize Assets

WIOA reauthorization needs to address this deficit-based language while maintaining critical reporting on who receives what services and to what impact. One way to do this would be to reframe ‘individuals with barriers’ to ‘individuals CONFRONTING barriers’ and to clearly articulate the public workforce system’s role to support that confrontation with resources needed to overcome barriers. Reauthorization should also involve a stakeholder consultative process, much like that included in Strengthening Career & Technical Education for the 21<sup>st</sup> Century Act (Perkins V) in which people confronting the barriers detailed in WIOA priority populations should be involved in designing the services for their communities. Adults in our communities have skills and experiences that can be a powerful starting point for building toward their career aspirations. WIOA needs to leverage job seekers’ assets in order to design more effective solutions.

<sup>1</sup> WIOA Performance Accountability Hot Topics. Retrieved from <https://www.workforcegps.org/sitecore/content/global/events/2016/12/14/12/38/WIOA-Wednesday-WIOA-Performance-Accountability-Hot-Topics>

<sup>2</sup> WIOA Co-enrollment Lessons Learned. Retrieved from <https://www.workforcegps.org/events/2018/06/21/15/09/WIOA-Co-Enrollment-Cohort-Lessons-Learned>

<sup>3</sup> Strategic Co-enrollment Unified Plan Partners. Retrieved from [https://www.edd.ca.gov/Jobs\\_and\\_Training/pubs/wsd19-09.pdf](https://www.edd.ca.gov/Jobs_and_Training/pubs/wsd19-09.pdf)

<sup>4</sup> Training and Employment Guidance Letter 7-20. Retrieved from [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_7-20.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_7-20.pdf)

<sup>5</sup> WIOA State Plans. Retrieved from <https://wioaplans.ed.gov>.

<sup>6</sup> Training and Employment Guidance Letter 10-16 Change 1. Retrieved from [https://wdr.doleta.gov/directives/attach/TEGL/TEGL\\_10-16-Change1.pdf](https://wdr.doleta.gov/directives/attach/TEGL/TEGL_10-16-Change1.pdf)

<sup>7</sup> Program Memorandum OCTAE 17-2. Retrieved from <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf>

**Questions or Comments?** Please contact Judy Mortrude, Senior Technical Advisor at World Education's National College Transition Network: [judy\\_mortrude@worlded.org](mailto:judy_mortrude@worlded.org).