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| <b>TRAINING AND EMPLOYMENT<br/>NOTICE</b> | <b>NO.</b> 13-13              |
|   | <b>DATE</b> November 29, 2013 |

**TO:** STATE WORKFORCE AGENCIES  
STATE WORKFORCE LIAISONS  
STATE WORKFORCE ADMINISTRATORS

**FROM:** Eric M. Seleznow /s/  
Acting Assistant Secretary

**SUBJECT:** Accounting for and Reporting Co-Enrollment under the Workforce Investment Act (WIA) and Wagner-Peyser Programs

**1. Purpose.** This Training and Employment Notice (TEN) serves as a reminder to states of the importance of ensuring that duplication of services is not occurring as a result of co-enrolling participants in the WIA and Wagner-Peyser programs.

**2. References.**

- Training and Employment Guidance Letter (TEGL) No. 17-05, *Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues.*
- Office of Inspector General (OIG) Audit Report No. 03-12-004-03-390, *Changes Can Provide ETA Better Information on Participants Co-Enrolled in WIA and Wagner-Peyser Programs.*

**3. Background.** OIG Audit Report No. 03-12-004-03-390 provided the following three recommendations in regards to co-enrollment for the WIA and Wagner-Peyser Programs:

- Work with stakeholders in the development of a comprehensive unified reporting and performance measurement system for participants receiving services through the workforce system as a whole, regardless of a services funding source;
- Identify and share best practices to resolve the challenges associated with providing multiple services under WIA and Wagner-Peyser at the American Job Centers; and
- Remind State Workforce Agencies of the importance of ensuring that duplication of services is not occurring as a result of co-enrollment.

While TEGL 17-05 included guidance on the importance of co-enrollment, this TEN expands on this guidance. In this document specifically, co-enrollment refers to the practice of enrolling a participant in WIA and Wagner-Peyser programs simultaneously. It is acknowledged that the general term "co-enrollment" has a more universal meaning; however, this Notice focuses solely on the practice of co-enrolling participants between WIA and Wagner-Peyser programs.

**4. Ensuring Non-Duplication of Services using Co-Enrollment.** There is no requirement under WIA or Wagner-Peyser regulations that requires a reporting mechanism to be developed to capture co-enrollment practices. However, the Department encourages states to utilize management information systems that help facilitate and capture co-enrollment practices. Program integrated client tracking systems promote effective co-enrollment practices and reporting. Currently, a comprehensive performance accountability system (i.e. Workforce Investment Streamlined Performance Reporting (WISPR)) is being piloted by two states, with additional states and territories afforded the opportunity to participate. In the absence of collecting social security numbers, a streamlined reporting system which incorporates information from several program areas is the best data reporting mechanism, and the only option to produce unique participant counts across multiple funding streams. Additionally, the Enterprise Data Reporting and Validation System continues to be updated to provide states with a more streamlined reporting system for existing approved reporting vehicles, while initial work on a module to incorporate WISPR reporting is scheduled to begin later in 2013.

Because the Workforce Investment Act Standardized Record Data cannot be used to identify potentially duplicative services, states need to ensure that they have mechanisms in place for American Job Center (AJC) staff to help ensure that services are not duplicated. The ETA recognizes that there are situations where a pure count of services provided may cause a reviewer to think that services overlap. However, states and AJC staff must continue to be able to determine the appropriate services to meet an individual's needs, as well as maximize resources within the AJC. This is particularly important for states that rely on a co-enrollment process to serve individuals. For example, if core services are offered using Wagner-Peyser funds, comparable services should not be re-offered with WIA funds for the same participant, unless the case manager deems it appropriate.

ETA also is interested in hearing about best practices from states that find co-enrolling participants to be a helpful service delivery method. Any responses should be sent electronically to [ETAPerforms@dol.gov](mailto:ETAPerforms@dol.gov) and shared with your regional performance specialist.

ETA views co-enrollment practices as a voluntary tool available to states to enhance service delivery. This notice is not intended to neither encourage nor discourage states from following this practice. The intent here is simply to make states aware of the importance of ensuring that duplication of services is not occurring as a result of co-enrollment.

**5. Action Requested.** Please make this information available to appropriate program staff.

**6. Inquiries.** Questions regarding this information should be directed to ETA Regional Performance Specialists.