



Missouri Department of Higher Education and Workforce Development

FREQUENTLY ASKED QUESTIONS (FAQs) ABOUT...

DWD Issuance 03-2019: Co-enrollment and Provision...

(Issued: August 14, 2019)

Last update: April 2020.

Q: When a participant is co-enrolled into TRADE and WIOA, do staff have to post activity codes in both applications.

A: The WIOA Application should contain the required initial services, which are the 213 (assessment) and the 205 (employment plan). **After the initial services are complete, Trade staff should only post services to the Trade Application.** The two applications are linked so that one will not exit prior to the other one. If WIOA staff assist the participant with something not related to TRADE, then that staff person should post services to the WIOA Application only.

Last update: April 2020

Q: If a participant is co-enrolled in WP and WIOA, do staff have to post activity codes in both applications.

A: Staff will need to post a countable service in both WIOA and WP to start participation in either of those programs. After participation has been triggered (after the first countable service is posted), staff only need to post the service code under the application that is appropriate based on funding. Therefore, if WIOA funded staff are delivering the service then they would post the activity code to the WIOA application.

Last update: February 2020.

Q: Now that co-enrollment into WIOA is required for Trade participants, do Trade staff also have to post services to the WIOA Application?

A: The WIOA Application should contain the required initial services, which are the 213 (assessment) and the 205 (employment plan). After the initial services are complete, Trade staff should only post services to the Trade Application. The two applications

are linked so that one will not exit prior to the other one. If WIOA staff assist the participant, then that staff person should post services to the WIOA Application.

Last update: December 2019

Clarification: OWD no longer oversees the SkillUP program, as of October 1, 2019; therefore, the requirement to enroll all SkillUP participants is rescinded, effective immediately. However, when staff are working with participants and determine that the participants would benefit from WIOA, con-enrollment is encouraged.

Last update: August 2019.

Q: Now that Trade participants must be co-enrolled into WIOA does that require a separate (hard) file?

A: There is no requirement to keep separate files. However, if staff decide to put them together the WIOA specific documents should be kept in a specific section within the file.

Last update: August 2019.

Q: Doesn't it violate the rules if non-merit staff post services on the Wagner-Peyser application in MoJobs?

A: No. Staff-assisted search activity is recorded on the W-P application in MoJobs regardless of the staff person's funding. Labor exchange services including job search and placement assistance is a Basic Career service that all Job Center staff are required to perform. They just happen to post exclusively on the W-P application in our system.

Q: Why are we required to complete a Wagner-Peyser application if we are not state merit staff?

A: Job search activity that you assist the participant with is handled exclusively through the W-P application.

Q: What happens if an individual has been job searching on their own in jobs.mo.gov then staff refers them on a job order without completing a Wagner-Peyser application?

A: This creates an error in our federal reporting software due to missing required data elements, thus preventing us from reporting your activity as required. You must complete the W-P application before doing a job search for an individual.

Q: As a WIOA-funded staff, why do I have to create a full WIOA registration just to do a staff-assisted job search or provide resume assistance?

A: WIOA-funded staff who provide staff-assisted services without registering the individual into the Adult, Dislocated Worker, or Youth program are in direct violation of [20 CFR 680.110](#) which requires registration for any individual receiving Career services other than self-service or informational services.

Q: Please Clarify – The Issuance notes “Effective Date 7/29/19” but on the final page, the “Timeline – Implementation of these rules...October 29, 2019.” Which is the correct date, please?

A: Clarification – Because this policy may require a Local WDB to modify its criteria for application of priority for WIOA Adult-funded Career services, DWD established the deadline of October 29, 2019 for full implementation of these rules. This possible delay does not prevent Frontline Workforce System Staff from applying the co-enrollment rules, effective immediately.

Q: If WIOA staff are only doing a W-P enrollment how do they charge their time?

A: WIOA staff would never need to complete a W-P enrollment without completing a WIOA enrollment. Self-service and informational services are posted to the W-P application that is still only in “Registered Individual” status and will be reported to USDOL as a “Reportable Individual.” If WIOA-funded staff deliver a staff-assisted service, they must complete a WIOA application.

Q: Example: Trade is enrolling an individual for training that will be covered by Trade along with supportive services such as transportation and school supplies. What role will WIOA take on if all funding is covered under Trade?

A: [TEGL 1-19](#), Trade Adjustment Assistance Data Integrity (TAADI) Section 4(d) established this requirement based on previous guidance from [TEGL 19-16](#) Section 20. Please read this guidance to understand what USDOL expects and holds us accountable for.

Q: What if WIOA-funded staff do a RESEA registration & services? How would they charge their time?

A: Staff will be charging their time to the RESEA grant while performing those duties, so they are not considered WIOA-funded at that point and do not have to create a WIOA registration.

Q: What about WIOA-funded staff doing RJS?

A: WIOA co-enrollment would be required, but because RJS is automatic Dislocated Worker eligibility documentation, they'd only need to gather documentation for authorization to work in the US, Selective Service compliance, and Complaint and Grievance.

Q: Why would a Local Board not allow DWD staff to create WIOA enrollments?

A: We're unsure, but the Board is in control of this and the State defers to local control.

Q: What if a Trade participant was enrolled in a training program not approved by the Local Board?

A: Local policy would not allow Dislocated Worker participation.

Q: Will training be provided to State staff who will begin WIOA registration?

A: Training on local policy and procedures would be provided at the discretion of the Local Board.

Q: Is the WIOA enrollment TAA participants be done at the initial appointment?

A: That would be ideal, but Local Boards will make that decision.

Q: What if the Local Board won't approve a supportive service for a TAA participant?

A: They must follow their local policy and if a supportive service is not allowable, they can't pay it.

Q: What if a TAA participant is only utilizing the job search allowance and not enrolled in training? Is co-enrollment in WIOA still required?

A: Yes

Q: What if an individual wants to access TAA services in a region where they do not reside and the LWDB will not enroll non-residents in WIOA?

A: DWD understands WIOA co-enrollment is not always possible. This is a case where WIOA co-enrollment would not be possible in that region.

Q: Do we have to co-enroll all participants already served prior to 7/29/19?

A: No. This policy is effective 7/29 and staff must follow it going forward.

Q: What if an individual is helped by WIOA-funded staff but they are not WIOA eligible?

A: WIOA-funded staff may only assist with self-service/informational services if the individual is not WIOA eligible.

Q: Does this mean that if a WIOA-funded staff provides a workshop, the job seeker must be enrolled in WIOA?

A: No. Workshops are considered informational in nature and do not trigger participation nor require registration.

Q: If someone comes in without required documentation for WIOA enrollment, do we send them home without serving them? If they are not registered with Selective Service?

A: DO NOT send them away without providing services. WIOA-funded staff can provide informational services and assist with self-service activities without a documented WIOA registration and DWD staff can provide staff-assisted services with a W-P registration only. We realize this USDOL registration requirement is burdensome for Job Center staff and are working to find alternative approaches to minimize this burden while maintaining compliance.

Q: With WIOA being "last resort" as we have all heard many times.... how does that work with braiding of services, would we be threatened with disallowed cost for braiding WIOA funds as braiding and last resort could be seen differently?

A: WIOA is not necessarily the ultimate "last resort", but all other sources of assistance must be considered when determining the proper use of program funds. This is

explained more fully in [DWD Issuance 18-2016](#), "Coordination of Workforce Innovation and Opportunity Act Title I-B Training Funds with Other Available Funding" and [DWD Issuance 13-2017](#), "Statewide Supportive Services Policy." All staff involved with WIOA-funded training or supportive services need to have a complete understanding of these rules in order to avoid a disallowed cost situation.

Q: This issuance does not mention SkillUp co-enrollment requirement expires September 30, 2019— will that be listed in updated issuances?

A: After September 30, 2019, DWD will not operate a SkillUp program, so the co-enrollment rule will no longer apply. Any future update to this policy issuance should not reference SkillUp.

Q: Wondering about uploading/secure transmission to upload. Locally here at the board our IT person has talked extensively with people about ways to transfer PII information with us being so rural and everything has been shot down as not deemed secure or costs too much for us to be able to implement. How is it deemed secure to upload into MoJobs but not to send to co-workers within the same organization?

A: The MoJobs system has been deemed secure by the Missouri Office of Administration Information Technology Services Division. Any other transmission of Personally Identifiable Information must be encrypted or otherwise maintained in a manner compliant with [state information security policy](#).

Q: I understand regulations, but beyond that - what is the point of enrolling someone into a program if they are not going to access the services? We are being required to enroll people into the program when we would not normally do so, we are afraid of EO type of complaints based on enrolling someone due to entitlement or co-enrollment requirements when someone else may not be enrolled without being in those programs or co-enrollment rules.

A: The point of enrolling an individual into every program for which they are eligible is to maximize the options available to them to overcome barriers and successfully obtain self-sufficient employment. Participants enrolled into a program because of these co-enrollment rules are not given any special priority over other program participants, so if all other rules are followed, there should be no EO concerns.

Q: Does the information in the Title I app transfer back and forth in the Title III app as each is updated?

A: At the registration stage, data pre-populates into the following enrollment, but must be verified. After that, any services or activities posted remain on the application on

which they were entered, but countable services posted on one program application will extend the exit date on all other programs.

Q: What if an individual is not eligible based on the information added to the WIOA application? Therefore, we couldn't add a participation. Isn't that then against the federal mandate, if a WIOA staff member does a staff-assisted service?

A: Yes. That would not be allowable. WIOA-funded staff may only provide staff-assisted services to WIOA eligible individuals.

Q: If DWD staff enroll into WIOA and there is a funded service deemed disallowed, who is responsible for the disallowed cost?

A: DWD staff would only create WIOA enrollments at the direction of the Local Board which is responsible for all WIOA expenditures.

Q: We were told if we dual-enroll a participant, we need to put the activities in both applications. Is this correct?

A: That is only necessary for SkillUp participants enrolled in another program because the SNAP application is not tied to the other programs for common exit purposes. A co-enrollment in any other MoJobs programs would not require duplicate entries because a countable service on one application will extend the exit date of all program enrollments.

Q: We do not know eligibility of job seekers for WIOA services until they are assessed. Therefore, should WIOA staff never serve job seekers needing staff-assisted services because they haven't been assessed for eligibility? What about affiliate Job Centers which are fully run by WIOA-funded staff and have no state staff? How are they to serve customers?

A: Eligibility Determination is a Basic Career service that does not trigger participation nor require registration. WIOA-funded staff must determine WIOA eligibility prior to providing any staff-assisted services, and only provide self-service or informational services to individuals who do not meet WIOA eligibility requirements.

Please direct all questions or comments regarding the Issuance or this FAQ document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

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