

# Co-Enrollment in WIA Youth, Adult, and Dislocated Worker Programs

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Sometimes Workforce Investment Act (WIA) youth participants – especially older, out-of-school youth – can benefit greatly from services for adults and dislocated workers in addition to youth services. Commonly called *co-enrollment*, concurrent enrollment allows eligible youth to participate in multiple WIA programs.

## Why Co-Enroll a Youth?

It is appropriate to co-enroll a WIA youth participant in the adult or dislocated worker program if

- The youth would benefit from services and activities designed to accommodate adult work and family responsibilities and schedules.
- Local area policy or limited funds do not allow the youth to receive an individual training account (ITA) under youth funding.
- The youth would benefit from activities provided by both funding streams.
  - Adult and dislocated worker programs have more emphasis on finding appropriate employment. So, a youth's need for immediate training and assistance in resume writing, job searching, job matching, and job seeking and in acquiring specific occupational skills would best be met by adult or dislocated worker services.
  - Youth programs emphasize other youth development needs. So, a youth's need for broader, longer-term assistance in civic, social, intellectual, and employability development to prepare for employment would best be met by youth services.

## Regulations and Policy

Federal regulations allow co-enrollment of youth who meet the eligibility requirements of the adult and dislocated worker programs.

Under the Act, eligible youth are 14 through 21 years of age. Adults are defined in the Act as individuals age 18 and older. Thus, individuals ages 18 through 21 may be eligible for both adult and youth programs. There is no specified age for the dislocated worker program.

Individuals who meet the respective eligibility requirements may participate in adult and youth programs concurrently. Concurrent enrollment is allowable for youth served in programs under WIA titles I or II. Such individuals must be eligible under the youth or adult/dislocated worker eligibility criteria applicable to the services received. Local program operators may determine, for individuals in this age group, the appropriate level and balance of services under the youth, adult, dislocated worker, or other services.

Local program operators must identify and track the funding streams that pay the costs of services provided to individuals who are participating in youth and adult/dislocated worker programs concurrently, and ensure that services are not duplicated.

**Source:** 20 CFR 664.500.

Ohio policy governs other details of co-enrollment.

Concurrent enrollment occurs when a participant is enrolled in programs under two or more WIA funding sources at one time or is receiving both WIA-funded staff-assisted and non-WIA services. At the time of exit, all funding sources are to take the identical exit outcome for these participants when all funding sources end at the same time. If the participant enters unsubsidized employment, all funding sources will show the placement.

**NOTE:** Participants may be concurrently enrolled only if they have met the eligibility requirements for additional titles at the time they were originally determined eligible for the WIA program, or when participants reach an age for a different eligibility, participants can be concurrently enrolled at that time.

**NOTE:** A concurrent enrolled participant must have an Employment Development Plan or Individual Service Strategy that will require concurrent participation in more than one program or title, including non-WIA funded programs (not only multiple activities in a single program or title).

**Source:** Ohio's Workforce Information Center, *Workforce Development Glossary*, "Concurrent Enrollment."

### Youth and ITAs

WIA youth participants receive occupational skill training by providers selected through competitive bidding by the local area; if appropriate to meet the youth's needs, an occupational skill training program is included in the youth's Individual Service Strategy (ISS), the youth is enrolled in the program, and the provider receives payment from the local area according to the contract arrangements.

In the WIA adult and dislocated worker programs, however, participants receive and pay for occupational skill training differently. If a participant receives a required sequence of services and meets any applicable local-area policy requirements, the participant receives an ITA. The ITA is essentially a voucher that the participant can use to pay for occupational skill training from any Eligible Training Provider – a training provider who has been approved by a local workforce investment board and the Ohio Department of Job and Family Services to be eligible to receive ITAs under WIA. A State Eligible Training Provider list is maintained and made available to adult and dislocated worker participants.

An individual training account is a method of payment that local workforce investment boards establish on behalf of WIA customers to give them financial power to purchase training services from the eligible training providers. WIA Title I adult and dislocated workers purchase training services from eligible providers they select in consultation with the case manager.

Individual training accounts should be established in a manner that maximizes customer choice in selecting training providers. The authority to restrict the duration of ITAs or to restrict funding amounts should not be used to establish limits that arbitrarily preclude WIA customers from selecting a service provider of their choice. Local workforce investment boards have the authority to set written procedure for making payments, select individual training account options and set duration or amounts of individual training accounts and/or policies regarding exceptions.

Payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments may also be made incrementally; through payment of a portion of the costs at different points in the training course.

**Source:** Ohio's Workforce Information Center, *Workforce Development Glossary*, "Individual Training Account (ITA)."

However, in Ohio, under waiver authority (ODJFS WIATL 19), a youth participant ages 16-21 who is out of school or in school and at risk of dropping out may receive an ITA without co-enrolling in the adult and dislocated workers program if the youth.

Youth at risk of dropping out are

Individuals who are unlikely to complete elementary and secondary school successfully and to acquire skills necessary for higher education and/or employment. Contributing factors may include the following:

- alcohol/drug abuse
- cyclical poverty
- delinquency/truancy
- family abuse/neglect
- family structure

- habitually truant
- handicapping condition
- health condition
- inadequate readiness skills/developmental delay
- inappropriate instruction
- inappropriate school curriculum
- inappropriate school placement
- limited English/non-English speaking
- low self-esteem
- pregnancy
- An at-risk youth is one having one or more of these factors.

**Source:** Ohio's Workforce Information Center, *Workforce Development Glossary*, "At Risk Youth."

Local areas establish their own policy and requirements for providing youth ITAs, and local area youth funds are used to pay for youth ITAs. Youth ages 14-15 cannot receive an ITA and must receive occupational skill training through the local youth program provider.

### Eligibility for WIA Youth, Adult, and Dislocated Worker Programs

The table below shows similarities and differences between WIA youth, adult, and dislocated worker eligibility criteria.

Eligibility Criteria: WIA Youth, Adult, and Dislocated Worker Programs			
Criteria	Youth	Adult	Dislocated Worker
Age	14-21	18 or over	None
US citizen or national or lawfully admitted noncitizen	Yes	Yes	Yes
Properly registered for Selective Service	Yes	Yes	Yes
Low-income individual	Yes (except for 5 percent exception)	No (unless area is in limited funds)	No
Other	Must have barrier as defined in WIA §101(30), "Eligible Youth"	Must receive sequence of core, intensive, and training services	Must qualify as dislocated worker Must receive sequence of core, intensive, and training services

The income criteria for youth, adult, and dislocated workers are different.

- WIA youth must be low-income individuals as defined in WIA §101(25), *except that* 5 percent of the youth participants served in a local area may be youth who do not meet the definition of a low-income individual.
- There is no income requirement for WIA adult services *unless* the local area is in limited funds. Local areas establish criteria for priority of service if the area is in limited funds, with priority of service given to public assistance recipients and other low-income individuals.
- There is *never* an income requirement for WIA dislocated worker services.

Finally, WIA adult and dislocated worker services both provide the same sequence of core, intensive, and training services, with similar criteria for each as shown below.

Eligibility for Sequence of WIA Adult and Dislocated Worker Services		
Criteria	Adults	Dislocated Workers
<b>Registered Core Services</b>		
Must qualify as dislocated worker	No	Yes
1. Was terminated, laid off, or received notice of layoff; is eligible for or exhausted unemployment insurance (UI); or if not UI-eligible, has been working long enough to demonstrate attachment to the workforce and unlikely to return to previous industry or occupation		
2. Has been terminated, laid off, or received notice of layoff as a result of a permanent closure or substantial layoff		
3. Was self-employed but unemployed due to general economic conditions or natural disaster		
4. A displaced homemaker		
<b>Intensive Services</b>		
Received at least 1 core service	Yes	Yes
<i>If unemployed</i> , determined to be in need of more intensive services to obtain employment	Yes	Yes
<i>If employed</i> , determined to be in need of intensive services to obtain or retain employment that leads to self-sufficiency	Yes	Yes
<i>If the area is in limited funds</i> , meets local area criteria for priority of service	Yes	No
<b>Training</b>		
Received at least 1 intensive service	Yes	Yes
In need of training to have skills and possesses qualifications to successfully complete the selected training	Yes	Yes
Training directly linked to local employment area or area to which individual is willing to relocate	Yes	Yes
<i>If the area is in limited funds</i> , meets local area criteria for priority of service	Yes	No
Unable to obtain grant assistance from other sources of funding or requires assistance beyond grant to pay for training	Yes	Yes

### Co-Enrollment to Meet the Needs of Youth

Co-enrollment should always meet the needs of youth. The needs of the youth come first; if the youth's needs can be met best by a combination of services under different WIA funding streams, then co-enrollment is the answer.

- Help meet a youth's education and training needs through an adult or dislocated worker ITA that is not available in the WIA youth program because of local funding or policy constraints.
- Provide wrap-around WIA youth development services to complement the more employment-related WIA adult and dislocated services.
- Promote youth participation and persistence through adult or dislocated worker activities that accommodate youths' adult schedules and responsibilities.
- Meet youths' need to be treated as adults and not just children.

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## Youthwork Information Brief

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