

SAN JOAQUIN COUNTY WORKNET EMPLOYMENT AND ECONOMIC DEVELOPMENT DEPARTMENT POLICIES AND PROCEDURES DIRECTIVE

DIRECTIVE NO.	EFFECTIVE DATE	APPLICABILITY	PAGE
26-04	October 1, 2026	CMD	1 of 10
SUBJECT: WIOA/NFJP CO-ENROLLMENT AND COMMON EXIT			

I. PURPOSE

The purpose of this policy is to establish a coordinated approach for co-enrollment and common exit of participants receiving services through the Workforce Innovation and Opportunity Act (WIOA) Title I programs and the National Farmworker Jobs Program (NFJP) administered by the San Joaquin County Employment and Economic Development Department (EEDD). The policy is intended to promote coordinated service delivery, maximize available resources, reduce duplication of services, and provide eligible individuals with access to the workforce services most appropriate to their employment and career goals.

II. GENERAL INFORMATION

WIOA Title I and NFJP serve individuals with different program eligibility requirements and funding sources. An individual may meet the eligibility requirements for both programs and may receive services from both programs when co-enrollment is appropriate and provides a benefit to the participant.

NFJP is authorized under WIOA Section 167 and provides workforce services to eligible migrant and seasonal farmworkers. NFJP regulations require a customer-focused case management approach and provide for career services and training consistent with WIOA requirements.

Co-enrollment does not eliminate the requirement for each program to establish and document the participant's eligibility in accordance with applicable federal, state, and local requirements.

References

- WIOA §167, [29 U.S.C. §3222](#), National Farmworker Jobs Program

- WIOA §121, [29 U.S.C. §3151](#), Establishment of One-Stop Delivery Systems
- [20 CFR §678.430](#)
- [20 CFR Part 685](#), National Farmworker Jobs Program
- [20 CFR §683.150](#)
- [20 CFR §677.150](#)
- [TEGL 14-18, Attachment 7](#), NFJP Performance Accountability Guidance
- [TEGL 10-16, Change 3](#), Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs
- [WSD24-07](#), Performance Guidance
- [WSD19-09](#), Strategic Co-Enrollment

III. POLICY

A. **Co-Enrollment**

The Local Workforce Development Board supports co-enrollment between WIOA Title I and NFJP when co-enrollment is appropriate based on the participant's needs and will enhance the participant's ability to achieve their employment or career goals.

Co-enrollment should be considered when:

- The individual is eligible for both programs;
- The participant would benefit from services or resources available through both programs;
- Services can be coordinated without unnecessary duplication;
- The programs can appropriately share responsibility for the participant's service plan; and
- Co-enrollment is consistent with applicable program requirements.

Co-enrollment is not required solely because an individual is eligible for both programs. Staff should consider the participant's needs, available services, funding requirements, and the most appropriate program or combination of programs to support the participant's employment goals.

B. **Coordination of Services**

When an individual is co-enrolled, the WIOA and NFJP programs should coordinate case management and service delivery to the extent permitted by applicable confidentiality and information-sharing requirements.

The programs should identify:

1. The participant's employment and career goals;
2. Services to be provided by each program;

3. The program responsible for funding each service;
4. Any supportive services or other resources available through each program; and
5. The expected sequence and coordination of services.

Services provided through one program should not be duplicated or charged to another program when the same service or cost has already been appropriately funded.

Co-enrollment does not require the programs to provide identical services or to divide the cost of every service. Each program remains responsible for ensuring that expenditures charged to its grant are allowable, allocable, and adequately documented.

C. Eligibility and Documentation

Each program shall independently determine and document participant eligibility in accordance with its applicable federal, state, and local requirements. Co-enrollment does not establish eligibility for the other program. Documentation collected for one program may be used by the other program when permitted by applicable requirements and when sufficient to establish the applicable eligibility criterion.

D. Case Management and Service Planning

For co-enrolled participants, staff should coordinate participant assessments, employment goals, service plans, training activities, supportive services, and follow-up activities to avoid unnecessary duplication and conflicting service plans. Where appropriate, the programs should communicate regarding significant changes in the participant's circumstances, including changes in employment goals, training status, barriers, or planned services. The participant remains the primary decision-maker regarding participation in services and selection of appropriate career and training options, subject to applicable program requirements.

E. Common Exit

For participants who are co-enrolled in WIOA Title I and NFJP, the EEDD shall implement common-exit requirements in accordance with applicable federal requirements, U.S. Department of Labor guidance, and California Employment Development Department (EDD) guidance and CalJOBS procedures.

Common exit applies to programs included within California's applicable common-exit framework. When a participant is co-enrolled in WIOA Title I and NFJP and both programs are subject to the common-exit requirements,

This WIOA Title I-financially assisted program or activity is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. This program is substantially funded by federal funding. For more information go to: www.sjworknet.org/WIOAresources.asp

the participant shall not be considered exited until the applicable common-exit criteria have been met for all programs included in the common exit.

In accordance with applicable federal and state requirements, a participant's receipt of services from one co-enrolled program may extend the participant's common-exit date even when another co-enrolled program has completed its services. The end of services under one program does not, by itself, establish the participant's common-exit date.

The common-exit date shall be determined and recorded in CalJOBS in accordance with applicable EDD reporting requirements and the federal and state common-exit methodology.

Program staff shall coordinate prior to closing a participant's program record, as appropriate, to determine whether the participant remains actively enrolled in another program subject to common exit. Staff shall not establish a program exit date that conflicts with applicable common-exit requirements.

Program-specific service closure may occur before common exit. When a program ceases providing services to a co-enrolled participant, staff shall document the program-specific service end date and applicable reason for closure while maintaining the participant's enrollment status consistent with common-exit requirements.

F. Program-Specific Exit

A program may cease providing services to a participant before common exit occurs. When this occurs, staff shall document the participant's program-specific service end date and reason for ending services. Ending services under one program does not, by itself, terminate the participant's enrollment in the other program or establish the common exit date.

G. Follow-Up

Following common exit, each program shall provide follow-up services and collect required performance information in accordance with its applicable program requirements. Follow-up services do not, by themselves, extend the common-exit date when the participant is no longer receiving services that restart the exit period. NFJP federal guidance specifically states that follow-up services do not extend the NFJP exit date.

IV. PROCEDURE

These procedures establish the operational steps for identifying, coordinating, documenting, and closing participants who are co-enrolled in WIOA Title I and the National Farmworker Jobs Program (NFJP). These procedures implement applicable federal requirements, U.S. Department of Labor (DOL) guidance,

California Employment Development Department (EDD) guidance, and CalJOBS reporting requirements.

A. WIOA Staff

WIOA staff shall:

- Apply these procedures when coordinating WIOA/NFJP co-enrollment;
- Ensure WIOA requirements are met for WIOA-funded services;
- Coordinate with NFJP staff as appropriate;
- Maintain accurate WIOA records and CalJOBS information;
- Apply applicable common-exit requirements; and
- Address identified documentation or service coordination issues.

B. NFJP Staff/Provider

NFJP staff/provider shall:

- Determine and document NFJP eligibility;
- Provide NFJP services in accordance with applicable requirements;
- Coordinate participant services with WIOA Title I when appropriate;
- Maintain NFJP records and required documentation;
- Communicate relevant participant status information as permitted; and
- Follow applicable federal, state, and local common-exit and reporting requirements.

C. Supervisors/Managers

Supervisors and managers shall provide guidance regarding implementation of these procedures and address questions or situations that are not clearly resolved by applicable federal, state, or local requirements. Questions involving interpretation of policy, federal or state requirements, or circumstances that may establish a precedent should be referred through the appropriate management chain to the Executive Director.

D. Identification of Potential Co-Enrollment

1. Staff shall identify participants who may be eligible for both WIOA Title I and NFJP based on information obtained during intake, eligibility determination, assessment, career planning, or service delivery.
2. Staff shall inform the participant about potentially available services and, when appropriate, facilitate a referral to the other program.
3. Co-enrollment shall be considered when participation in both programs is appropriate to the participant's needs and may provide additional

services, resources, or support toward the participant's employment or career goal.

4. Co-enrollment shall not be required solely because a participant meets the eligibility requirements of both programs.
5. When a participant is already enrolled in one program and is being considered for enrollment in the other, staff should coordinate with the other program before establishing a duplicative service or funding arrangement.

E. Eligibility Determination

1. Each program shall independently determine and document the participant's eligibility in accordance with applicable federal, state, and local requirements.
2. Staff may use eligibility information or documentation obtained by the other program when permitted by applicable requirements and when the documentation is sufficient to establish the applicable eligibility criterion.
3. Staff shall not assume that eligibility for one program establishes eligibility for the other program.
4. When eligibility information is shared between programs, staff shall maintain documentation in accordance with applicable confidentiality, records retention, and data-sharing requirements.

F. Assessment and Service Planning

1. Staff from the programs shall coordinate, to the extent appropriate and permitted, the participant's assessment, employment goal, training plan, supportive services, and other planned services.
2. Staff should avoid requiring the participant to complete duplicative assessments or provide duplicate documentation when existing information may appropriately be used.
3. The participant's employment or career goal should provide the basis for determining the services to be provided by each program.
4. For co-enrolled participants, staff shall identify, as appropriate:
 - o Services to be provided by WIOA Title I;
 - o Services to be provided by NFJP;
 - o The program responsible for funding each service;
 - o Supportive services available through each program;
 - o Training or employment activities supported by each program; and

- o Any coordination necessary to avoid duplication.
5. The participant's service plan shall reflect the services necessary to achieve the participant's employment goal and should not include services solely for the purpose of maintaining enrollment or performance eligibility.

G. Coordination of Funding and Services

1. Each program shall be responsible for determining whether a service or cost is allowable and may be charged to its respective funding source.
2. Staff shall coordinate funding responsibilities to prevent duplication of payment for the same service or cost.
3. When one program is able and appropriate to fund a service, the other program should not duplicate the same expenditure unless separately allowable and necessary.
4. Co-enrollment does not require WIOA and NFJP to share the cost of a service. Each program may provide different services based on participant need and program requirements.
5. Training services shall be coordinated to ensure that the participant's training plan, training provider, funding source, and related supportive services are appropriately documented.
6. When a participant receives supportive services from both programs, staff shall document the services sufficiently to demonstrate that the assistance is not duplicative.

H. Case Management Coordination

1. Staff shall maintain appropriate communication regarding the participant's progress when coordination is necessary for effective service delivery.
2. Coordination may include:
 - o Changes in the participant's employment or career goal;
 - o Training enrollment, progress, completion, or withdrawal;
 - o Changes in barriers affecting participation;
 - o Changes in employment status;
 - o Supportive service needs;
 - o Significant changes in the participant's circumstances; and
 - o Planned closure of services.
3. Information shall be shared only as permitted by applicable confidentiality and information-sharing requirements.

4. Staff shall document significant coordination activities in the appropriate case record.
5. Staff shall not require the participant to serve as the intermediary for routine coordination that can appropriately occur between program staff.

I. Ending Services Under One Program

1. A participant may complete or discontinue services under one program while continuing to receive services from the other program.
2. When services under one program end, staff shall:
 - o Document the program-specific service end date;
 - o Document the reason for ending services;
 - o Determine whether the participant remains enrolled in the other program;
 - o Determine whether additional services are scheduled or anticipated; and
 - o Follow applicable CalJOBS procedures.
3. Ending services under one program does not automatically establish the participant's common-exit date when the participant remains enrolled in another program subject to common exit.
4. Staff should coordinate with the other program before closing the participant's record when necessary to determine whether common-exit requirements remain applicable.

J. Common Exit Determination

1. For participants co-enrolled in WIOA Title I and NFJP, staff shall follow the common-exit methodology established by applicable federal and EDD requirements.
2. Staff shall review the participant's service activity across the programs included in the applicable common-exit framework before recording an exit.
3. A participant shall not be exited from the applicable common-exit population solely because services under one program have ended if the participant continues to receive applicable services from another program included in common exit.
4. Staff shall consider the participant's most recent applicable service activity when determining whether the common-exit requirements have been satisfied.

5. Staff shall follow current EDD CalJOBS guidance regarding:
 - o Services that restart the exit period;
 - o Services that do not restart the exit period;
 - o Follow-up services;
 - o Scheduled future services;
 - o Exit dates; and
 - o Required CalJOBS data entry.
6. The common-exit date shall be entered in CalJOBS in accordance with current EDD requirements.
7. Staff shall not establish an earlier exit date for a program when doing so would conflict with the applicable common-exit methodology.

K. Follow-Up Services

1. Following exit, each program shall provide required follow-up services in accordance with its applicable program requirements.
2. Follow-up services shall be documented separately from services that establish or restart an exit period, consistent with current federal and EDD guidance.
3. Follow-up services provided by one program shall not automatically reopen or extend enrollment in the other program.
4. Staff shall follow applicable CalJOBS instructions when recording follow-up services.

L. Re-Enrollment After Exit

1. A participant who returns for services after common exit shall be evaluated for re-enrollment in accordance with the applicable program's requirements.
2. Prior participation in WIOA or NFJP does not automatically establish eligibility for subsequent services.
3. Staff shall determine whether the participant meets the applicable eligibility requirements and whether a new enrollment is appropriate.
4. When the participant is potentially eligible for both programs, staff should again consider whether co-enrollment is appropriate based on the participant's current needs.

M. Monitoring and Quality Assurance

1. EEDD staff responsible for program monitoring shall review a sample of co-enrolled WIOA/NFJP records to assess compliance with applicable requirements.
2. Monitoring may include review of:
 - o Eligibility documentation;
 - o Co-enrollment rationale, when applicable;
 - o Assessment and service planning;
 - o Coordination of services;
 - o Funding and expenditure documentation;
 - o Supportive services;
 - o Program-specific service closures;
 - o Common-exit determination;
 - o CalJOBS data entry; and
 - o Follow-up services.
3. Monitoring findings shall distinguish between:
 - o Compliance deficiencies requiring corrective action;
 - o Data-entry or documentation errors; and
 - o Program improvement opportunities.
4. Recurring issues identified through monitoring should be evaluated to determine whether additional technical assistance, training, procedural clarification, or policy revision is appropriate.

V. QUESTIONS REGARDING THIS DIRECTIVE

May be referred to the Executive Director of EEDD via Managers or designee.

VI. UPDATE RESPONSIBILITY

The Executive Director of EEDD and/or designee shall be responsible for updating this directive, as appropriate.

VII. APPROVED



PATRICIA VIRGEN
EXECUTIVE DIRECTOR

PV: