Co-enrollment Webcast Synopsis

Co-enrollment Across Apprenticeship Grants, Contracts and Cooperative Agreements

For H-1B-funded Apprenticeship Grants and Grants, Contracts and Cooperative Agreements Funded with Apprenticeship Appropriated Funds

A March 2021 webcast conducted by the Department of Labor/Employment and Training Administration (DOL/ETA) focused on co-enrollment across apprenticeship grants, contracts, and cooperative agreements. The presentation walked grantees through the purpose, benefits, and conditions of co-enrollment; some highlights of DOL’s co-enrollment policy; some co-enrollment scenarios and FAQs; and the roles and responsibilities of grantees. What follows is a synopsis of the presentation for the benefit of YARG grantees.

NOTE: The training applies to H-1B Funded Grant Programs that support apprenticeships, as well as grants contracts and cooperative agreements funded with apprenticeship appropriated funds. Please see the slideshow for a list of the specific programs to which this training applies.

WHAT is Co-enrollment?
Co-enrollment is enrolling a participant in more than one program. You can co-enroll participants in a variety of services and activities, including training, supportive services, and other related activities supported by DOL/ETA funds.

WHY Co-enroll Participants?
Co-enrollment is encouraged wherever it is appropriate. Its intent is to meet the needs of program participants and provide as many participants as possible with comprehensive services that may not otherwise be available or allowable under an individual program or funding source.

Co-enrolling allows individual programs to:
- Maximize the resources available to participants
- Minimize the duplication of services
- Increase the impact of program funding
- Show integration in the form of participant co-enrollment

HOW to Co-enroll Participants.
The Employment and Training Administration (ETA) encourages maximizing federal resources and minimizing duplicative services. This can be accomplished through partnerships, alignment with state and local workforce systems, and by leveraging federal and non-federal funds.

In addition to co-enrolling in H-1B funded and apprenticeship appropriated funded activities, other partnership opportunities include the Workforce Innovation and Opportunity Act programs (WIOA), YouthBuild, Job Corps, Trade Adjustment Assistance programs, adult education programs, career and technical education programs, vocational rehabilitation programs, and several other Federal and non-federal programs.
- Each program that houses a co-enrolled participant can report outcomes achieved for those individuals.
- When co-enrolling participants, remember that they must meet eligibility criteria and allowable activities for each program in which they are co-enrolled.
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H-1B Co-enrollment Policy Highlights.
1. Do not co-enroll participants in more than one H-1B job training program grant.
2. H-1B grantees may co-enroll participants in certain other programs, such as those listed below, if the conditions in the following section are met:
   a. Workforce Innovation and Opportunity Act (WIOA).
   b. Appropriated apprenticeship funds, such as State Apprenticeship Expansion (SAE) grants, Apprenticeship State Expansion (ASE) grants, and AACC Expanding Community College Apprenticeships (ECCA) activities – if used to expand Registered Apprenticeships.
   c. Other federally funded programs.
   d. Non-federal programs.
Grantees may use tools, materials, curriculum or other resources that are developed by other DOL-funded training grant programs or any other training program, including other H-1B-funded grant programs, provided that these activities do not result in co-enrollment.

Highlights of H-1B Co-enrollment Conditions.
In order to co-enroll, the following conditions must be met:
1. Participants must be determined eligible for each of the grants per the FOA and the grantee Statement of Work. Every program has specific and distinct eligibility requirements.
2. Participants must be enrolled in allowable and non-duplicated grant activities.
3. Grantees must adhere to cost allocation, if appropriate.
4. Grantees must report leveraged resources (both federal and non-federally funded) on the ETA-9130 financial report form and quarterly narrative reports (QNR), as appropriate, for both grants.
5. Fiscal and Performance Reporting policy and practice must be in keeping with the Uniform Guidance (appropriate cost allocations, etc.) and with Program Office reporting guidelines for the grant, contract, or cooperative agreement.
6. Grantees must report on performance outcomes in accordance with the performance reporting requirements for each co-enrolled program, as appropriate.

H-1B Co-enrollment: Scenarios.
1. Enrollment in both an H-1B Scaling Apprenticeship grant and an H-1B American Apprenticeship Initiative grant. Not allowed. (Both are-funded by H-1B funds.)
2. Enrollment in both an H-1B Closing the Skills Gap grant and an AACC ECCA grant. Allowed if conditions are met and for Registered Apprenticeship Programs (RAPs) only.
3. Enrollment in both an H-1B American Apprenticeship Initiative (AAI) grant and an ASE or SAE grant. Allowed if conditions are met and for RAPs only.
4. Enrollment in both an H-1B Scaling Apprenticeship grant and an intermediary contract. Allowed if conditions are met and for RAPs only.
5. Enrollment in both an H-1B grant and a state-funded apprenticeship grant. Possible, if conditions are met.

Common Co-Enrollment Policy Questions.
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Can participants in Apprenticeship Appropriated funded grants, contracts, and cooperative agreements be co-enrolled in the activities of more than one of these Apprenticeship Appropriated-funded programs?

Yes. While these grantees, contractors, and cooperative agreements should not co-enroll participants more than once in the same Apprenticeship Appropriated-funded program, recipients may braid different Apprenticeship Appropriated-funded programs and services together to provide comprehensive training and support for participants.

Can I co-enroll participants in other DOL workforce programs?

Yes. ETA encourages the maximization of federal resources and the minimization of duplicative services. Grantees, contract, or cooperative agreement recipients can braid together program funds to increase impact through partnership building, alignment with state and local workforce systems, and leveraging federal and non-federal funds.

How can programs pursue co-enrollment strategies?

1. Participants must meet all eligibility requirements for each program in which they are co-enrolled. It's important to make sure that everybody meets these requirements.
2. Participants must be enrolled in allowable non-duplicated activities.
3. Participants should not be co-enrolled in more than one grant, contract, or cooperative agreement within the same initiative. (Examples to come.)
4. Funds from the grantee, contract, and/or cooperative agreement must be spent only on costs as allowed under federal law, such as the Federal Acquisition Regulation (FAR) and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance or UG), which describes spending requirements for federal grants and cooperative agreements.
5. Grantees, contracts, and cooperative agreements should refer to performance reporting guidance provided by the Office of Apprenticeship for reporting costs and outcomes associated with co-enrollment activities.

Apprenticeship Appropriated Funds Co-Enrollment: Scenarios.

1. Enrollment in both an H-1B-funded and an Office of Apprenticeship-funded (OA) apprenticeship initiative (e.g., H-1B AAI and the industry intermediary). Allowed if the participant meets eligibility criteria and allowable activities for each program in which they are co-enrolled.
   
   Note: OA-funded apprenticeship investments only allow funds to be used to support enrollment in RAP and pre-apprenticeship activities. So, an OA funded apprenticeship investment can only co-enroll a participant in H-1B-funded grants for RAP activities.

2. Enrollment in both an H-1B Closing the Skills Gap grant and AACC Expanded Community College Apprenticeship cooperative agreement (ECCA). Allowed if conditions are met and for RAPs only.

3. Enrollment in both an Apprenticeship State Expansion (ASE) and State Apprenticeship Expansion (SAE) grants. Not allowed. (Participants should not be co-enrolled in more than one grant, contract, or cooperative agreement within the same initiative, so SAE, ASE, and SAE2020 cannot be co-enrolled with each other.)

4. Enrollment in either the ASE or the SAE grant and the AACC ECCA grant. Allowed if conditions are met.
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5. Enrollment in both an Industry Intermediary and Youth Apprenticeship Intermediary contract. Allowed if conditions are met.

6. Enrollment in both a Youth Apprenticeship Readiness Grant (YARG) and one of the ASE or SAE 2020 grants. Allowed if conditions are met.

7. Enrollment in both an SAE 2020 and WIOA. Allowed if conditions are met.

8. Enrollment in both an ASE and a YARG grant and reporting participant outcomes under each program. Allowed if conditions are met.

NOTE: Grantees should report on performance outcomes in accordance with the performance reporting requirements for each of the co-enrolled programs.

Managing Co-Enrollment: Roles & Responsibilities
Grantees, contractors, and cooperative agreements are responsible for managing and monitoring co-enrollment under their programs, including any activities carried out by subawardees.

Subawardees should direct any questions to their contractor, grantee, or cooperative agreement lead and should not directly contact a federal project officer, contact officer representative, or the ETA program office.

Grantees, contractors, and cooperative agreements should contact their federal project officer (FPO) or contract officer representative (COR), as applicable, for answers to any questions that are not addressed by this resource or by the appropriate FAQs.

Program Office Contacts
YARG grantees, for questions on co-enrollment please contact your FPO as your primary point-of-contact. You can also copy the YARG mailbox (YouthASReady.Grants@dol.gov), if appropriate.

Find the webcast and presentation slides for this training HERE.
Note that the webcast slides explain highlights of the co-enrollment policy. For further details, please see the FAQs for each individual H-1B grant program at these links:

Apprenticeship Appropriated Funds Co-enrollment Policy FAQs
https://ase.workforcegps.org/resources/2020/08/13/20/06/New-Apprenticeship-Grants-Co-Enrollment-Policy