

## **Updated Policy Guidance: Co-enrollment of Participants with Apprenticeship Appropriated Funds**

### **Frequently Asked Questions (FAQ) about Co-enrollment of Participants in Grants, Contracts, and Cooperative Agreements Funded with Apprenticeship Appropriated Funds and other DOL-Funded Grants**

*Effective as of August 12, 2020*

#### **Can participants in OA grants, contracts, and cooperative agreements be co-enrolled in the activities of more than one of these OA-funded programs?**

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

#### **What is co-enrollment?**

For the purposes of this policy guidance, co-enrollment is defined as enrolling a participant in more than one grant program, contract, or cooperative agreement that is funded with apprenticeship appropriated funds (see list of applicable OA grants, contracts, and cooperative agreements below), and where they are receiving grant, contract, or cooperative agreement-funded participant services. Co-enrollment services can include training (such as related technical instruction and on-the-job learning/on-the-job training), supportive services, and other activities supported by ETA funds. Co-enrollment is intended to maximize the number of resources available to participants in apprenticeship and other job training programs, while minimizing duplication of services.

#### **What are the current OA Registered Apprenticeship expansion grants, contracts, and cooperative agreements?**

For OA grants, contracts, and cooperative agreements, ETA allows co-enrollment among the following programs,<sup>1</sup> with some exceptions discussed further below:

- State Apprenticeship Expansion (SAE) grants (*FOA-ETA-16-07*)
- Apprenticeship State Expansion (ASE) grants (*TEGL 17-18*)
- AACC Expanding Community College Apprenticeships (ECCA) cooperative agreement
- Youth Apprenticeship Readiness Grants (YARG) (*FOA-ETA-20-60*)
- Building State Capacity to Expand Apprenticeship through Innovation (SAE20) (*ETA-TEGL-15-19*)
- Industry Intermediary Contracts

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<sup>1</sup> All of these funds were appropriated by Congress to “[e]xpand opportunities relating to apprenticeship programs registered under the National Apprenticeship Act.” *E.g.*, Public L. 115-245. Guidance provided in these FAQs does not apply to H-1B-funded apprenticeship grants, including American Apprenticeship Initiative (AAI) grants, Scaling Apprenticeship Through Sector-Based Strategies grants, and Apprenticeship: Closing the Skills Gap grants. For those grants, grantees should refer to guidance specific to those programs.

- Equity Intermediary Contracts
- Youth Apprenticeship Intermediary Contracts
- Apprenticeship Expansion and Modernization Fund Contracts
- Other grants and contracts which are funded with apprenticeship appropriated funds. DOL will update this list as applicable, upon the development and award of new OA-funded grants and contracts.

**Can I co-enroll participants in other Department of Labor workforce programs?**

Yes. For Registered Apprenticeship expansion programs, ETA encourages the maximization of Federal resources and the minimization of duplicative services. This can be done through partnership building, alignment with state and local workforce systems, and the leveraging of Federal and non-Federal funds. Several other Federal and non-Federal programs could provide services to participants that may not be available in a Registered Apprenticeship expansion program. Grantees, contract, or cooperative agreement recipients can braid together program funds to increase impact. Awardees for Registered Apprenticeship expansion programs have the opportunity to integrate programs through co-enrolling participants, assuming this co-enrollment aligns with eligibility criteria and allowable activities for each program.

**How can programs pursue co-enrollment strategies?**

Below is a short list of applicable requirements for these OA-funded programs, as well as other steps recipients should follow for co-enrollment. Please note that this is not an exhaustive list of all requirements and there are additional requirements specific to each program. Participants must meet all eligibility requirements for each program in which they are co-enrolled.

- Participants must be enrolled in allowable, non-duplicated activities.
- Participants should not be co-enrolled in more than one grant, contract, or cooperative agreement within the same initiative (for example, a person enrolled in industry intermediary contract A, may not be enrolled in industry intermediary contract B).
- Funds from the grantee, contract, and/or cooperative agreement are 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.
- Grantees, contracts, and cooperative agreements should refer to performance reporting guidance provided by OA, in regards to reporting costs and outcomes associated with co-enrollment activities. This includes meeting any reporting guidelines set by OA, as well as any other requirements required by ETA offices overseeing the programs in which participants are co-enrolled.