

**WISCONSIN'S  
WORKFORCE INVESTMENT ACT STATE PLAN  
MOST CURRENT AVAILABLE AS OF THE LAST  
U.S. DEPARTMENT OF LABOR'S APPROVAL  
JUNE 30, 2010**

***NOTE: THIS IS A COMPILATION OF THE MOST CURRENT  
INFORMATION FROM THE PREVIOUS STATE PLAN MODIFICATIONS:***

***State Plan Modification Program Year 2009-10***

***State Plan Modification Spring 2010 Program Year 2010-11***

***American Recovery and Reinvestment Act Addendum June 2009***

***These stand-alone documents along with related material  
may be accessed at***

***[http://dwd.wisconsin.gov/dwdwia/wia/wia\\_state\\_plans.htm](http://dwd.wisconsin.gov/dwdwia/wia/wia_state_plans.htm)***

Wisconsin Workforce Investment Act State Plan

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WORKFORCE INVESTMENT ACT TITLE I STATE PLAN  
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## **WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

### **1. Plan Development Process:**

#### **1. (a) Involvement of the Governor and State Board**

#### **1. (b) Description of State Board Collaboration**

### **2. Plan Development Process - Description of how the state handled public comments for the WIA State Plan Modification Spring 2010**

The State has provided an opportunity for public comment on and input in the state plan modification. The Council on Workforce Investment (CWI) was informed of the development of a modification at their December 18, 2009, meeting which provided an early input opportunity. This was also an agenda item on the January 22, 2010, Council's Executive Committee meeting. On January 6, 2010, DWD staff notified the Workforce Development Board Directors on the development of this modification at their Wisconsin Association of Job and Training Executive's (WAJTE) meeting. The draft modification was issued on February 8, 2010, to representatives of business, labor organizations, chief local elected officials, and the full array of workforce investment partners across the state for a 30-day review and comment period. Two comments were received that did not alter the draft document. The public comments are in Attachment 0. The CWI completed the State Plan Modification process at their March 19, 2010, meeting.

**I. Summary: Governor's Visions and Goals**

**I. A. Economic Development Strategies and Goals**

Governor Doyle launched a strategic plan in January 2008 to strengthen Wisconsin's economy.

*Grow Wisconsin - The Next Steps: Accelerate-Innovate*

<http://www.wisgov.state.wi.us/docview.asp?docid=12933>

provides a comprehensive package of initiatives that will drive innovation, foster growth and give business fertile ground to develop and flourish. The *Next Steps* established eight strategic economic development goals:

- Retain and create high wage jobs with focused efforts on creating and expanding employment opportunities that will increase people's earning power;
- Prepare workers for tomorrow's economy by providing continual education-skills training that people need to advance their careers and meet the changing business needs;
- Add value in Wisconsin's economic base using a high-end strategy to support Wisconsin's base industries of manufacturing, agriculture and tourism for increased productivity, export growth, and innovation;
- Create and unleash knowledge to build emerging industries expanding on Wisconsin's world-class universities and businesses intellectual property;
- Tap Wisconsin's full urban potential through maximizing the strengths of Milwaukee to benefit the entire state;
- Implement strategies regionally to tailor activities based on local uniqueness;
- Lower regulatory burdens by continuing to reform regulatory processes in order to keep standards high and protect our environment, workers and consumers while achieving a faster, simpler and more efficient regulatory structure; and,
- Build a world class infrastructure by continuing to build and maintain a transportation, communications and energy infrastructure that supports job growth and business development.

Governor Doyle believes that the best investment Wisconsin can make is one that improves the education and skills of our people. The states that will do well in the coming years will be those that have a highly skilled workforce ready for the jobs of tomorrow. His "Invest in People" strategies focuses on providing people with access to opportunities that will allow them to maximize their potential, increase their productivity and increase their wages through a more sophisticated collaborative workforce system and focused funding on efforts that have a proven track record.

**I. B. Vision for Maximizing and Leveraging Resources**

The Governor is committed to improving the effectiveness of Wisconsin's economic and workforce development system by focusing multiple governmental and non-governmental organizations on common goals and aligning resources across programs with different funding sources and constituencies. The Governor's cabinet has been directed to fine-tune a coordinated, demand-driven system(s) with common high-level goals in order to be responsive to industry's need for highly skilled workers. Various strategies are being used including policy scans across programs and agencies to reduce duplication and unnecessary impediments. In addition, the Governor has reinforced his CWI recommendations on re-aligning workforce resources and improvements with the workforce infrastructure including:

- Regional planning processes with common outcomes, cross-agency letters of support, and cooperative agreements for collaboration and shared resources;
- Establishment of regional economic, education and training and service delivery metrics of "success"/common outcomes;

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- Waiver requests and formula fund adjustments to create a more nimble and efficient workforce system; and
- Development and implementation of a formal sector-based approach to workforce development, and leverage regional resources based on business needs.

### **I. C. Vision for Skilled Workforce Education and Training**

Approximately two-thirds of the jobs created in Wisconsin through 2016 will require some form of training. To meet that challenge, Governor Doyle proposed to increase investments in the education and workforce development systems to ensure that Wisconsin has the most talented and skilled individuals working and leading the economy forward. The Governor's *Next Steps* to provide people with continued and increased career and employment opportunities include:

- Increasing funding for the Wisconsin Technical College System (WTCS) Workforce Advanced Training Program to increase investment in the development of incumbent workers and expand technical college training services to help businesses;
- Creating Opportunity Grants to assist low-wage workers currently not eligible for technical college financial aid to upgrade their skills;
- Supporting partnerships between business and education to train people such as the industry-led Manufacturing Skills Standards Certification (MSSC) program that provides workers with required manufacturing skills;
- Creating Skills Jump Start Pilot Training Grants for adults lacking high school degrees with an emphasis on occupational training in high-demand occupations;
- Launching an adult apprenticeship mentoring pilot program for improved retention of minority apprentices in the program;
- Remitting tuition for veterans attending the State University and Technical College systems;
- Developing certification of work readiness that will help employers find entry level workers, and implementing a standard skills assessment tool statewide;
- Increasing the State's Regional Skills Industry Education (RISE) initiatives to promote skills and opportunities for low-wage working adults;
- Incorporating career clusters and pathways, and access to the training needed throughout the PK-12, WTCS, and postsecondary systems, with free transferability of credits;
- Using waivers to increase incumbent worker training; and
- Creating the Wisconsin Covenant Foundation for financial assistance to students with need.

### **I. D. Vision for Collaboration on Workforce Challenges**

The Governor has committed resources and state staff to participate in the two Workforce Innovations in Regional Economic Development (WIRED) initiatives and the National Governor's Association (NGA) Sector Strategies Academy. Both major efforts involve the array of workforce partners at the table to develop common solutions and innovative strategies. Other examples of how Governor Doyle is bringing together key players:

- Conducted biannual Economic Development Summits with private and public-sector leaders from across the state;
- Created the Governor's Business Council composed of key business and industry representatives;
- Named representatives of the Milwaukee 7 to his statewide Business Council to continue to solicit input about how to support job creation and economic development in the greater Milwaukee region;
- Actively supports partnerships between business and education through the WTCS Workforce Advancement Training Program;

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- WTCS and the University of Wisconsin (UW) continue partnerships to expand opportunities for students by creating a more seamless education system through increase of transfers from one system or school to another; and
- Created a Non-Traditional Occupations Task Force with interagency and key players statewide to infuse efforts into programs including youth apprenticeship.

### I. E. Vision for Education and Training of Youth

Wisconsin's historic investment in quality education has continued under Governor Doyle's leadership. He is committed to ensuring the preparation of students for 21<sup>st</sup> century industries and jobs. His strategic vision includes:

- Launching the Wisconsin Covenant to provide access to post-secondary education for all high school students with financial need along with a privately gifted Fund for Wisconsin Scholars;
- Supporting and expanding the Mayor of Milwaukee's summer youth jobs program;
- Revamping career information to include all facets of education and training beginning at grade-school level;
- Promoting career pathways outreach, and increasing interest in demand occupations;
- Designing effective bridge programs that will also rebuild effective training systems;
- Using career clusters as the foundation of movement through the pre-kindergarten - 16 and workforce development systems for needed training with free transferability of credits;
- Investing in proven initiatives such as four-year-old kindergarten, small class sizes and Project Lead the Way (PLTW);
- Engaging students in more math and science to excel in jobs with changing technology and product innovation;
- Developing improved transition strategies for youth with disabilities;
- Implementing a statewide standard skills assessment tool for graduating high school seniors;
- Integrating pre-kindergarten - 16 Councils into the regional sector strategies efforts; and
- Developing articulation agreements for effective transition from youth apprenticeship to adult apprenticeship programs.

### II. Governor's Key Workforce Investment Priorities

Governor Doyle's *Next Steps* strategies reflect a basic tenant that an educated and skilled workforce is essential to meeting the needs of business. Therefore, he has outlined activities that will make the public workforce development system more responsive for a competitive business climate along with improved accountability and transparency. In concert with the CWI, there will be an articulation of a statewide high-road sectoral economic and workforce development strategy, led by the Governor, and supported by other state activity and funding. The Governor's specific workforce priorities for 2009-10 are to:

- Invest in state-wide skill assessment tools, work readiness certificates and career information efforts along with the expansion of Wisconsin's MSSC Program. As part of a systemic workforce system improvement, utilizing standards that are recognized nationally by industry will assist individuals' career pathways and employer's searching for workers;
- Set industry-driven priorities for all training programs operated by the Departments of Workforce Development (DWD), Commerce, Corrections, Children and Families and WTCS. This coordination effort will ensure that training programs are designed for, and responsive to, meeting the employment needs of the regional economic sector industries;
- Support partnerships between business and education through the (a) WTCS Workforce Advancement Training Program. This program establishes a mutual understanding of the types of skills and knowledge workers will need to fill available, good-paying job opportunities, and has already served 90 businesses with 11,900 trained workers; and (b) Emerging Industry Skills Partnership (EISP) grants to provide industry, technical colleges and workforce development boards

(WDB) with the ability to train people for good-paying jobs in the growing sectors of the economy such as biotechnology and renewable energy; and

- Require regional strategic planning with multiple partners at the table that will transcend program boundaries for shared common goals, success metrics, improved alignment of workforce resources, and expansion of the *Next Steps* and WIRED agendas.
- Expand the virtual job center, Job Center of Wisconsin (JCW). This continually evolving project is a convenient and fast way for employers to connect with the state's workforce. For job seekers, it provides easy access for job searches and other supports. In addition, work is underway to provide a career pathways guide in a variety of targeted high-wage, high-growth industries to better meet current and anticipated employment opportunities;

### **III. State Governance Structure**

#### **III. A. Organization of State Agencies**

##### **III. A. 1. Organizational Chart**

Attachment C provides the organizational chart that shows the Governor's cabinet agencies and all of the workforce partner programs.

##### **III. A. 2. Interrelationship of Agencies**

As discussed more fully in Section V, the Governor has directed the state's workforce-related partners to develop cross-agency systemic coordination, and target the same industry priorities for an improved talent pipeline. With further detail in III.C.1., the Governor has also committed managers and staff from the workforce related state agencies to be active participants in two major policy and planning initiatives. In general, at the cabinet level, Governor Doyle has an expectation of continual interrelationships on matters related to advancing the state's workforce and economy. Many of the state-level oversight bodies are also comprised of multi-agency representatives. For example, the Technical College System Board is the coordinating agency for the WTCS. Nine of the 13 members are appointed by the Governor in addition to three of the major state workforce partners, the Secretary of the DWD, the State Superintendent of the Department of Public Instruction (DPI), and a UW System Board of Regents representative.

#### **III. B. State Workforce Investment Board**

##### **III. B. 1. Organization of State Board**

The CWI has 40 members appointed by the Governor. The Executive Committee is the current standing committee with two specialized sub-committees:

- The Dislocated Worker (DW) Subcommittee to advise the CWI and DWD on state special response funding and DW program policy; and
- The Medicaid Infrastructure Subcommittee to provide advice on the implementation of the Managed Care and Employment Task Force recommendations, and other guidance related to the U.S. Department of Health and Human Services Medicaid Infrastructure Grant for Wisconsin's Bridges to Work program that assists people with disabilities to enter the workforce without losing supports and medical assistance.

All three Committees provide reports at each CWI meeting.

As required, the Chair is a representative of the private sector. The Executive Director of the CWI is also the DWD Division of Employment and Training (DET) Administrator and Workforce Investment Act (WIA) Liaison.

**III. B. 2. Organizations and Entities Represented**

CWI members represent the required partners in WIA, the additional Gubernatorial mandated partner for the Temporary Assistance for Needy Families (TANF) program, as well as other vital stakeholders in Wisconsin's employment and training arena. The membership includes a majority of business representatives who are chief executive officers or who have optimum policy-making/hiring authority, along with labor, community, economic and education organization representatives from throughout the state. Attachment D lists the members as well as their affiliation and geographic location.

**III. B. 3. Process Used to Identify CWI Members**

The Governor ensures a well-balanced membership for the CWI. When vacancies occur he reviews a number of factors including rural/urban representation, geographic distribution throughout the state, and ethnicity. The Governor has added additional member slots when he has determined there was an important value-added, for example, the 2008 appointment of an employee from the General Motors plant in Janesville.

**III. B. 4. How Membership Effectuates Vision**

As a large and diverse body, the CWI is able to advise the Governor on workforce, economic development and education-related goals. Among the key benefits of Wisconsin's diverse council are:

- Increased ability to identify and gain in-depth understanding of the skill needs and challenges faced by a range of industry sectors and businesses in the state, particularly the high-wage emerging industries such as biotechnology, bio-fuels, advanced manufacturing and the industries experiencing significant skill shortages such as healthcare.
- Increased opportunities to develop more productive working relationships between the state and local workforce investment systems and to encourage state and local partnerships between workforce development and economic development efforts. This will help support the regional Growing Regional Opportunities in Wisconsin (*GROW*) and *Next Steps* agendas, and help develop Wisconsin regions to support DOL's WIRED direction.
- Increased opportunities for state agencies to align workforce, education, and economic development policies, strategies, and resources across state agencies and the programs they administer. This alignment will improve opportunities to target and leverage resources to better advance the Governor's goals and improve the workforce delivery system on a regional basis with key partners.

**III. B. 5. Description of Functionality**

In forming the CWI, the Governor gave it responsibilities that go beyond those mandated in WIA. These expanded responsibilities are articulated in the Governor's charge to the CWI:

- Promote the use of economic and labor market information to ensure evidence based policy recommendations to guide the state's broad workforce development system;
- Recommend policies to strategically target state training and education resources;
- Foster and support public-private partnerships and intergovernmental cooperation and coordination in the building of Wisconsin's workforce;
- Identify initiatives that invest in Wisconsin's workforce and establish measures to monitor progress towards achieving objectives;
- Function as the federally required WIA State Council to ensure that funds are used as required by federal law, to support the workforce goals of the state, and to disperse DW grants.

In 2005, Executive Order #88 expanded upon the Governor's initial charge in two additional areas:

- It directs the CWI to not only advise the Governor on workforce development strategy and policy, but to undertake research and other activities to assist the Governor in enhancing the operation and performance of workforce programs in the state; and
- It directs the CWI to provide direction and oversight to the Wisconsin Forward Award to advance high performance workplaces and other initiatives to support a skilled workforce.

**III. B. 6. Public Access to Meetings and Information**

The CWI is subject to state open meetings requirements (Wis Stat. ss 19.81-19.98). Open meeting requirements are specified in the Council's By-Laws. To ensure open meeting requirements are met, meetings of the full CWI and its committees are published on the DWD public notice web page. This is the method that DWD uses to inform the news media and the public in general about all meetings of councils and committees for which DWD is responsible. In addition, CWI and committee meetings are published on the CWI's website <http://www.wi-cwi.org>. The site provides a mechanism for interested individuals to be notified whenever a meeting announcement, meeting-related materials, and other CWI information are published on the CWI website. All CWI meetings, including committee meetings, are in locations that are physically accessible to people with disabilities. In addition, people with special needs, such as an interpreter or written materials in an alternative format, may contact DET staff for assistance. Finally, to make the meetings more accessible, and reduce travel costs and time, most meetings are set-up with a conference call service.

**III. B. 7. Conflict of Interest**

CWI members are state public officials as defined by Wis. Stats. ss 19.42 and are therefore subject to state prohibitions on conflicts of interest as specified in Wis. Stats. ss 19.46. Under this statute, conflict of interest prohibitions include, but are not limited, to:

- Taking any official action substantially affecting a matter in which the official, a member of his/her immediate family, or an organization with which the official is associated has a substantial financial interest; and
- Using his/her office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the official, one or more members of the official's immediate family either separately or together, or an organization with which the official is associated.

This provision is also included in the CWI's by-laws (Article 2.4)

**III. B. 8. State Resources**

The CWI is staffed by policy and administrative staff from DWD's DET and DET Bureau of Workforce Training (BWT). No DET staff is devoted exclusively to the CWI but have Council support duties as part of their positions. This arrangement ensures that the Governors' and CWIs' over-arching priorities are incorporated in staff's policy and program implementation work. WIA set-aside funds cover the costs of meetings and materials.

**III. C. Structure/Process for Collaboration**

**III. C. 1. Improvements to Operational Collaboration**

Since taking office, Governor Doyle has worked to strengthen regional workforce and economic development efforts throughout the state recognizing that the economy is not confined to geographic boundaries. Region-wide workforce system integration and coordination with major economic development and education entities formally began with the CWI creation of the seven *Grow* regions (Map Attachment E) for improved regional partner strategic planning, employer-linkage activities and industry cluster efforts. Governor Doyle has made a commitment to align funding from multiple state agency programs with the *Grow* regions in order to maximize coordination and impacts. This operational shift recognizes that the regional economies must drive their skills analysis, identify training needs and training resources, and that employers must be at the center of identifying needs along with ensuring that the publicly-funded agencies adapt to those needs.

The Governor will advance coordinated planning by the following activities:

- Collaborative state-level cooperative agreements among cabinet agencies;
- Development of common workforce goals among multiple state and local government and non-governmental organizations;
- Produce a state-wide report on state agency system functions and progress in cross-agency planning, policy coordination and program implementation;
- Produce an annual report showing results of state, federal and non-governmental organizations investments for improved accountability; and,
- Formalize and implement regional metrics.

Wisconsin's project with the NGA Center for Best Practices Policy Academy, has provided a major forum for state collaboration. Governor Doyle's designated team of senior leaders was recognized by the Policy Academy as being uniquely positioned to develop and implement substantial changes in policies and practices to address workforce needs. Core team members include Secretaries and staff from DWD, Department of Commerce (Commerce), DPI, WTCS, as well as representatives from the local boards, labor, private employers, independent colleges and the UW-Center on Wisconsin Strategy (COWS). Their operational goal is to develop and begin to implement strategic action plans that align policies and resources across workforce development, economic development and education to create customized, regional solutions to address the skill, recruitment, and retention needs of key industries and the training, employment, and career advancement needs of workers.

DWD continues to convene the Select Committee on Health Care Workforce Development three times per year. This 34 member Committee is comprised of industry leadership from statewide health care associations, education, long term care, public health, regional workforce development, labor and state government to identify and implement top-priority, immediate and long-term strategies for addressing the health care worker shortages in Wisconsin. BWT Health Care staff also participates on pertinent statewide health care workforce related committees and workgroups.

**III. C. 2. Lines of Communication to Implement Vision**

All of the state agencies with responsibility for advancing the Governor's workforce development strategies are members of the CWI. The state departments represented are: Workforce Development, Children and Families, Commerce, Corrections, Health, Veterans Affairs and Public Instruction, and other education agencies: State Technical College System Board and the UW-Extension. Eight of the CWI members also serve on local WDBs that ensures on-going state and local communication.

**III. C. 3. Mechanisms for Information Sharing Between State Agencies/State Board and Local Boards/Areas**

DWD Secretary and staff meet regularly with the Wisconsin Association of Job Training Executives (WAJTE) composed of the WDB directors. The directors typically attend CWI board meetings and provide input. There are also ongoing state/local staff advisory committees such as the Automated System Support Employment and Training (ASSET) Users Group. Ad hoc work groups are also created for full partner participation in issue areas, for example, to help redesign the Job Center Standards. Policy and program guidance is provided on the Internet with issuances to partners through Administrator's email memos. Finally, the DWD Secretary generates a monthly electronic newsletter, 21<sup>st</sup> Century Workforce Wisconsin Briefing, for those serving the state's workforce and employers.

**III. C. 4. Entities to Effectuate Youth Vision**

The CWI has a representative from the DPI who is also active in the cross-agency work of the Policy Academy noted earlier. Wisconsin has a Policy Council that guides the development of WISCareers that includes a number of different agencies including the Workforce Department. The state also has a PK-16 Leadership Council that meets regularly to share information and develop joint strategies to service young people. Members include representatives from state and local public instruction agencies, Wisconsin Manufacturers and Commerce, UW, WTCS, DWD, Cooperative Educational Service Agency, Wisconsin Association of Independent Colleges and Universities, Wisconsin Council of Religious and Independent Schools and labor organizations.

Governor Doyle created a new state department with responsibilities for the TANF, Child Care and Child Support programs and other related activities that serve low income, low-skilled families. The Department of Children and Families (DCF) was effective July 1, 2008, with the Gubernatorial mission to "protect children, strengthen families, and ensure that Wisconsin's children grow up in nurturing families and communities." It has unified more than 30 services previously divided among other state agencies, created improved coordination and reduced duplication of services. The new department's workforce-related activities include life-skills training, job development, supported employment, money and time management, and other support services. These and other training programs are operated through the

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Department of Corrections (DOC), will be further coordinated and directed toward demand occupations.

At the local level, the WDB's Youth Councils provide key guidance on local youth program services. Members of the Councils represent a broad spectrum of organizations working on youth development issues. The Youth School-to-Work Consortia Coordinators are the primary vehicle for bringing youth apprenticeship, tech prep and other youth work-based education activities to the table in these collaborative efforts. These partners, along with employers, also collaborate on the Youth Apprenticeship program that provides high school students with training in 22 occupational areas which has resulted in 80% of graduates receiving job offers from their work experience.

### IV. Economic and Labor Market Analysis

#### IV. A. Economic Base by Industry

Wisconsin has a diverse industry mix of goods-producing and services-providing industry sectors:

<b><u>Industries</u></b>	<b><u># of Jobs</u></b>
<b>Natural Resources, Mining and Construction</b>	126,200
<b>Manufacturing</b>	491,800
<b>Durable Goods</b>	309,600
<b>Nondurable Goods</b>	182,200
<b>Trade</b>	432,300
<b>Wholesale Trade</b>	121,900
<b>Retail Trade</b>	310,400
<b>Transportation Warehousing and Utilities</b>	110,700
<b>Information</b>	49,900
<b>Financial Activities</b>	163,200
<b>Professional and Business Services</b>	277,200
<b>Educational Services</b>	50,200
<b>Health Care and Social Assistance</b>	355,200
<b>Leisure and Hospitality</b>	258,900
<b>Other Services, ex. Public Admin.</b>	136,800
<b>Government</b>	420,600
<b>Federal Government</b>	28,900
<b>State Government</b>	103,300
<b>Local Government</b>	288,300
<b>Total Nonfarm Jobs</b>	<b>2,873,200</b>

With close to 2.9 million jobs (Nov 07-Oct 08 monthly average) Wisconsin has the nation's second highest percentage of manufacturing jobs as a share of its total job market. Within manufacturing, Wisconsin has relative strength in wood and lumber products, fabricated metals, industrial machinery, electrical equipment & appliances, computer & electronic products, transportation equipment, food products, paper manufacturing, printing, and plastics & rubber products.

But the state's manufacturing has been challenged in terms of overall employment for a number of years. In fact, there seems to be profound dissonance in how the sector's current multiple challenges are viewed. This dissonance is summarized as the current and projected trend of net manufacturing job loss is juxtaposed against skilled worker shortages and the need to maintain a pipeline of new workers to enter into this crucial sector.

Wisconsin's services-providing sector has shown strong job growth. Wisconsin's healthcare industry, in particular, has been robust. Healthcare job gains have offset the manufacturing job losses. Other services-providers within the professional and business services sector also show somewhat promising growth. Many of professional and business services sub-industries jobs are skilled "new economy"-oriented positions at the higher end of the wage scale. Other professional and business services sub-industries, such as its employment services contingent, are more closely linked to the state's manufacturing sector and ebb and flow with the sector's health.

With the rapid decline in the global, national, and state economic growth, few industries are expected to perform well over the next year or two. The dramatic economic turnaround will change recent job trends, sending most industry jobs numbers lower, with the possible exception of healthcare workers.

#### **IV. B. Growth Industries and Occupations**

##### **Growth Industries:**

The rapid downturn in economic growth has changed the outlook for job growth over the next year. In fact, we now expect a decrease in total non-farm jobs in Wisconsin in 2009. The degree of the decline will depend upon the breadth and depth of the economic cycle. The only industry in which we expect to see significant jobs gains is healthcare.

Over the longer-term period of 2006-2016, employment is projected to grow 8.0% and add 246,400 new jobs. In the long-term, 94% of Wisconsin's new job creation will occur among the group of thirty industries, with the top ten contributing to 68% of the state's employment growth.

In the long-term, health care, education, professional and business services, finance and insurance, and leisure and hospitality are projected to be the primary job drivers. The new jobs in these industries will primarily be due to anticipated population growth, the aging of Wisconsin's population, new business creation, and business outsourcing.

The most notable difference in the long-term outlook is the number of manufacturing-related industries adding large numbers of new jobs. Manufacturing is expected to have a net loss of 7,500 jobs in the long-term. There is only one manufacturing industry, Nonmetallic Mineral Product Manufacturing, expected to add significant net new jobs.

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## Wisconsin Projections, 2006-2016 30 Industries with the Most New Jobs

Industry Title	Estimated Employment			
	2006	2016	Change	% Change
Ambulatory Health Care Services	104,150	133,990	29,840	28.7%
Administrative and Support Services	127,480	151,570	24,090	18.9%
Food Services and Drinking Places	192,060	214,060	22,000	11.5%
Hospitals, Including State and Local Government	113,010	133,960	20,950	18.5%
Social Assistance	65,800	86,210	20,410	31.0%
Professional, Scientific, and Technical Services	95,810	113,080	17,270	18.0%
Educational Services, Including State and Local Government	261,670	272,810	11,140	4.3%
Religious, Grantmaking, Civic, Professional, and Similar Organizations	87,800	98,700	10,900	12.4%
Nursing and Residential Care Facilities	69,400	79,630	10,230	14.7%
Specialty Trade Contractors	81,470	89,380	7,910	9.7%
Insurance Carriers and Related Activities	67,700	75,180	7,480	11.0%
Merchant Wholesalers, Durable Goods	68,220	74,850	6,630	9.7%
Truck Transportation	49,550	55,050	5,500	11.1%
Management of Companies and Enterprises	41,510	46,800	5,290	12.7%
Credit Intermediation and Related Activities	54,770	59,650	4,880	8.9%
Local, Excluding Education and Hospitals	129,270	133,420	4,150	3.2%
Construction of Buildings	30,980	34,710	3,730	12.0%
Accommodation	31,510	35,210	3,700	11.7%
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	9,500	13,120	3,620	38.1%
Amusement, Gambling, and Recreation Industries	26,060	29,360	3,300	12.7%
Warehousing and Storage	12,230	15,260	3,030	24.8%
Real Estate	19,000	21,400	2,400	12.6%
General Merchandise Stores	61,750	63,960	2,210	3.6%
Repair and Maintenance	21,700	23,690	1,990	9.2%
Transit and Ground Passenger Transport	13,580	15,560	1,980	14.6%
Internet Service Providers, Web Search Portals, and Data Processing Services	8,040	9,750	1,710	21.3%
Personal and Laundry Services	26,800	28,490	1,690	6.3%
Merchant Wholesalers, Nondurable Goods	46,140	47,810	1,670	3.6%
Motor Vehicle and Parts Dealers	36,850	38,430	1,580	4.3%
Nonmetallic Mineral Product Manufacturing	11,520	13,020	1,500	13.0%

### Declining industries:

In the short-term, 41 industries are expected to lose jobs, while in the long-term 27 industries are. (See the following tables). In both the short-term and the long-term, fourteen of the declining industries are in manufacturing. These manufacturing industries account for 48% of total short-term job losses, and for 65% of the long-term job losses.

Federal and state governments are projected to lose job in the short-term, while local government is anticipated to add jobs. In the long-term, local and state governments are expected to add jobs, while the federal government is projected to lose jobs in Wisconsin.

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Wisconsin Projections, 2006-2016  
Industries with Declining Employment

Industry Title	Estimated Employment			
	2006	2016	Change	% Change
Machinery Manufacturing	69,440	65,160	-4,280	-6.2%
Paper Manufacturing	36,010	33,330	-2,680	-7.4%
Miscellaneous Store Retailers	15,940	14,200	-1,740	-10.9%
Electrical Equipment, Appliance, and Component Manufacturing	25,330	23,640	-1,690	-6.7%
Gasoline Stations	23,580	21,940	-1,640	-7.0%
Primary Metal Manufacturing	20,390	19,100	-1,290	-6.3%
Nonstore Retailers	21,000	19,760	-1,240	-5.9%
Food Manufacturing	59,030	57,900	-1,130	-1.9%
Telecommunications	13,160	12,130	-1,030	-7.8%
Computer and Electronic Product Manufacturing	22,890	22,000	-890	-3.9%
Food and Beverage Stores	57,320	56,460	-860	-1.5%
Transportation Equipment Manufacturing	36,630	35,990	-640	-1.7%
Utilities	11,270	10,780	-490	-4.3%
Textile Mills	1,770	1,480	-290	-16.4%
Printing and Related Support Activities	33,390	33,120	-270	-0.8%
Postal Service	14,420	14,180	-240	-1.7%
Wood Product Manufacturing	25,920	25,700	-220	-0.8%
Apparel Manufacturing	1,370	1,170	-200	-14.6%
Rail Transportation	3,920	3,750	-170	-4.3%
Broadcasting (except Internet)	4,990	4,850	-140	-2.8%
Leather and Allied Product Manufacturing	1,310	1,180	-130	-9.9%
Textile Product Mills	2,060	1,980	-80	-3.9%
Federal Government Excluding Postal Services	14,790	14,740	-50	-0.3%
Petroleum and Coal Products Manufacturing	380	340	-40	-10.5%
Pipeline Transportation	240	210	-30	-12.5%
<b>Also declining, but data not shown in order to protect employer confidentiality</b>				
Forestry and Logging	*	*	*	*
Mining (except Oil and Gas)	*	*	*	*

**Growth occupations:**

As in the case of the short-term industry projections, occupational job increases are expected to be limited to the healthcare industry in the short-term.

The 30 occupations projected to add the most new jobs during 2006-2016 are illustrated in the tables that follow. Registered nurses are at the top in both the short- and long-term. Twenty-one growth occupations are scattered across several major occupational groups with no one group dominating the lists. However, there are no production occupations on the long-term list.

Heavy and tractor-trailer truck drivers, general office clerks, waiters and waitresses, bookkeeping, accounting, and auditing clerks, carpenters, sales representatives, landscaping and groundskeeping workers, bartenders, and insurance sales agents are occupations expected to see job increases from 2006 to 2016.

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Wisconsin Projections, 2006-2016  
 30 Occupations with the Most New Jobs

Occupational Title	Estimated Employment			
	2006	2016	New Jobs	% Change
Registered Nurses	51,130	64,550	13,420	26.2%
Combined Food Preparation and Serving Workers, Including Fast Food	58,910	68,480	9,570	16.2%
Customer Service Representatives	43,840	52,640	8,800	20.1%
Personal and Home Care Aides	22,030	30,540	8,510	38.6%
Home Health Aides	16,550	23,310	6,760	40.8%
Retail Salespersons	85,660	91,700	6,040	7.1%
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	57,780	63,680	5,900	10.2%
Truck Drivers, Heavy and Tractor-Trailer	53,700	59,440	5,740	10.7%
Office Clerks, General	49,130	54,140	5,010	10.2%
Waiters and Waitresses	48,070	52,830	4,760	9.9%
Nursing Aides, Orderlies, and Attendants	36,740	41,450	4,710	12.8%
Bookkeeping, Accounting, and Auditing Clerks	47,710	52,210	4,500	9.4%
Child Care Workers	22,970	26,900	3,930	17.1%
Executive Secretaries and Administrative Assistants	31,660	35,460	3,800	12.0%
Receptionists and Information Clerks	26,180	29,940	3,760	14.4%
Accountants and Auditors	23,810	27,290	3,480	14.6%
Computer Software Engineers, Applications	8,830	12,170	3,340	37.8%
Maids and Housekeeping Cleaners	25,810	28,920	3,110	12.0%
Carpenters	30,230	33,130	2,900	9.6%
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	37,320	40,150	2,830	7.6%
Landscaping and Groundskeeping Workers	20,150	22,790	2,640	13.1%
Medical Assistants	7,120	9,720	2,600	36.5%
Bartenders	24,110	26,510	2,400	10.0%
Elementary School Teachers, Except Special Education	32,790	35,150	2,360	7.2%
Computer Systems Analysts	11,030	13,290	2,260	20.5%
Network Systems and Data Communications Analysts	5,150	7,390	2,240	43.5%
Social and Human Service Assistants	7,340	9,400	2,060	28.1%
Tellers	14,160	16,220	2,060	14.5%
Clergy	14,370	16,390	2,020	14.1%
Insurance Sales Agents	8,990	10,930	1,940	21.6%

**Declining occupations:**

The thirty occupations with largest declines in employment over the long-term include several clerical and administrative support occupations, production occupations, and sales occupations.

**WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

Wisconsin Projections, 2006-2016  
30 Occupations with Declining Employment

Occupational Title	Estimated Employment			
	2006	2016	New Jobs	% Change
Cashiers	66,070	62,400	-3,670	-5.6%
Stock Clerks and Order Fillers	33,570	30,410	-3,160	-9.4%
Packers and Packagers, Hand	25,300	22,490	-2,810	-11.1%
File Clerks	4,820	2,800	-2,020	-41.9%
Order Clerks	9,940	8,230	-1,710	-17.2%
Electrical and Electronic Equipment Assemblers	6,150	4,730	-1,420	-23.1%
Secretaries, Except Legal, Medical, and Executive	45,400	44,460	-940	-2.1%
Cutting, Punching, and Press Machine Setters, Operators, and Tenders, Metal and Plastic	11,210	10,390	-820	-7.3%
Telemarketers	6,660	5,860	-800	-12.0%
Driver/Sales Workers	8,110	7,470	-640	-7.9%
Computer Operators	2,230	1,630	-600	-26.9%
Computer Programmers	5,980	5,430	-550	-9.2%
Machine Feeders and Offbearers	4,980	4,490	-490	-9.8%
Packaging and Filling Machine Operators and Tenders	14,410	13,940	-470	-3.3%
Photographic Processing Machine Operators	870	410	-460	-52.9%
General and Operations Managers	27,170	26,720	-450	-1.7%
Mail Clerks and Mail Machine Operators, Except Postal Service	3,900	3,460	-440	-11.3%
Industrial Truck and Tractor Operators	15,620	15,220	-400	-2.6%
Paper Goods Machine Setters, Operators, and Tenders	8,470	8,090	-380	-4.5%
Laborers and Freight, Stock, and Material Movers, Hand	54,080	53,710	-370	-0.7%
Data Entry Keyers	6,650	6,300	-350	-5.3%
Lathe and Turning Machine Tool Setters, Operators, and Tenders, Metal and Plastic	2,880	2,530	-350	-12.2%
Switchboard Operators, Including Answering Service	3,500	3,160	-340	-9.7%
Telecommunications Equipment Installers and Repairers, Except Line Installers	2,560	2,240	-320	-12.5%
Postal Service Mail Sorters, Processors, and Processing Machine Operators	3,660	3,350	-310	-8.5%
Weighers, Measurers, Checkers, and Samplers, Recordkeeping	1,850	1,550	-300	-16.2%
Molding, Coremaking, and Casting Machine Setters, Operators, and Tenders, Metal and Plastic	9,150	8,850	-300	-3.3%
Legislators	5,370	5,080	-290	-5.4%
Word Processors and Typists	2,710	2,420	-290	-10.7%
New Accounts Clerks	1,900	1,640	-260	-13.7%

**IV. C. In-Demand Industries and Occupations**

The healthcare as an industry and healthcare occupations have both a strong immediate and long-term demand for workers. Among healthcare practitioners and technical occupations, 4,650 workers (from replacement and growth) will be needed in 2009. Among healthcare support workers the need for 2009 is 2,270 workers, and over the long-term it is 2,850 per year. During the 2006-2016 projection period the health care industry will add 61,020 jobs. Over the longer term, this need is projected to increase to an average of 5,810 workers per year.

Computer and mathematical occupations are projected to be in demand over the long-term. The need is expected to increase to an average of 2,260 openings per year.

Education will also have substantial needs in the long-term. Over the 2006-2016 period, the industry will need 11,140 jobs. Education, training, and library occupations will need about 5,150 people on average (replacements and growth) between 2006 and 2016.

**IV. D. Employment Critical to State's Economy**

Wisconsin's economy is in transition from a traditional manufacturing economy with a large number of lower-skilled production workers to a much more diverse economy relying on more technical occupations and higher skill sets. This is occurring across most industries. Health care practitioners, technicians and technologists; computer technology professionals; advanced manufacturing workers; truck drivers; customer service representatives; and first/line supervisors in administrative services, production, retail trade and health care are among the most critical positions in Wisconsin's economy.

**IV. E. Skill Needs**

The top skill needs for jobs in 2009, and for jobs out to 2016, are (1) reading comprehension; (2) active listening; (3) critical thinking; (4) active learning; and (5) speaking.

The entire lists of skill needs for current and projected jobs are below. These skills are also important in Wisconsin's critical occupations, although the relative significance of any particular skill varies by occupation.

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<b>2009 Skills Needed</b>	
<b>Skill</b>	<b>2009 Demand</b>
Reading Comprehension	39,191
Active Listening	38,692
Critical Thinking	34,638
Active Learning	31,295
Speaking	30,448
Coordination	30,148
Instructing	28,349
Monitoring	27,921
Writing	27,561
Learning Strategies	26,089
Time Mgmt	24,836
Social Perceptiveness	23,431
Service Orientation	21,784
Persuasion	19,059
Judgment and Decision Making	18,643
Complex Problem Identification	17,336
Mathematics	14,828
Equipment Selection	12,126
Negotiation	9,141
Troubleshooting	8,351
Mgmt of Personnel Resources	7,152
Equipment Maintenance	6,762
Operation Monitoring	5,793
Installation	5,663
Quality control	5,658
Mgmt of Financial Resources	4,778
Operations Analysis	4,734
Operation and Control	4,583
Systems Evaluation	3,654
Repairing	3,603
Science	3,068
Technology Design	2,895
Systems Analysis	2,794
Mgmt of Material Resources	2,775
Programming	831

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<b>2006-2016 Skills Needed (Average Annual Demand)</b>	
<b>Skill</b>	<b>Ave Ann Demand</b>
Reading Comprehension	48,370
Active Listening	48,079
Critical Thinking	42,800
Active Learning	38,119
Speaking	38,012
Coordination	37,260
Monitoring	34,136
Instructing	33,920
Writing	33,775
Learning Strategies	31,964
Time Mgmt	30,552
Social Perceptiveness	28,195
Service Orientation	26,228
Persuasion	23,048
Judgment and Decision Making	22,275
Complex Problem Identification	20,795
Mathematics	18,198
Equipment Selection	14,905
Negotiation	11,158
Troubleshooting	10,004
Mgmt of Personnel Resources	9,116
Equipment Maintenance	8,657
Installation	6,769
Quality control	6,491
Operation Monitoring	6,352
Mgmt of Financial Resources	6,085
Operations Analysis	5,512
Operation and Control	5,107
Repairing	4,916
Systems Evaluation	4,213
Science	3,648
Technology Design	3,305
Mgmt of Material Resources	3,211
Systems Analysis	3,211
Programming	887

**IV. F. Demographics of Labor Pool**

Wisconsin's present and projected workforce is characterized by a more than normally large baby boom cohort. Wisconsin, being a predominantly white, non-Hispanic population, had a very large baby boom and subsequently has a very large cohort of 43 to 61 year old persons that are moving ever closer to retirement eligibility. Wisconsin also is far from the immigration centers along the coasts and has not been a magnet state for new immigrant populations. Additionally, metropolitan areas like Minneapolis/St. Paul and Chicago have proved attractive to a large proportion of Wisconsin college graduates. This may confound the pursuit of critical skilled resident workers for Wisconsin's advanced process industries.

**IV. G. Labor Pool Migration**

Migrant and immigrant workers have historically labored in Wisconsin's agricultural and food packaging industries. Many of these workers are now attracted to more stable Wisconsin industries in recent years leaving voids in the agricultural and food packaging industries.

The majority of Wisconsin's immigrant populations have settled into Wisconsin counties directly adjacent to the Twin Cities and Chicago markets. Most likely, these new residents have jobs in the Twin Cities and Chicago markets. Rather than alleviate worker shortages in Wisconsin, these new arrivals increase the need for services in the communities in which they now reside. They also create housing challenges for existing residents in the communities into which the immigrants are moving.

Out-migration is occurring among Wisconsin's young, but particularly its young highly skilled populations. Many of Wisconsin's talented young are moving to large dynamic metropolitan areas outside the state. These young people are often attracted by the more modern industrial compositions of those communities. Moreover, when they leave, their new and growing families put down roots in other locales, perhaps never to return to Wisconsin.

**IV. H. Skills Gaps of Labor Pool**

From now until at least 2016, Wisconsin is most likely to experience the largest skill gaps in (1) reading comprehension; (2) active listening; (3) critical thinking; (4) speaking; and (5) active learning. Significant skill gaps will also likely exist in thirteen other skills (as illustrated in the following table).

<b>Skills with the Largest Skills Gaps</b>		
	<b>Skills Gap Index</b>	
<b>Skill</b>	<b>2006-2016</b>	<b>2007-2009</b>
Reading Comprehension	100	100
Active Listening	97	74
Critical Thinking	94	71
Speaking	91	83
Active Learning	89	94
Coordination	86	69
Monitoring	83	86
Writing	80	89
Instructing	77	80
Learning Strategies	74	77
Time Mgmt	71	66
Social Perceptiveness	69	91
Service Orientation	66	97
Persuasion	63	60
Judgment and Decision Making	60	57
Complex Problem Identification	57	63
Mathematics	54	54
Equipment Selection	51	31

**IV. I. Workforce Development Issues**

Wisconsin has a high labor force participation rate. Most of the readily employable workers are already in the workforce. As a consequence, one of the most important workforce development issue identified in Wisconsin is attracting and retaining more non-traditional labor in the workforce. This includes minority workers, workers with disabilities, problem civil and job histories, and older workers. Often this means addressing several barriers to employment such as transportation, childcare, education and training in both technical and soft skills.

The connection of workforce development to economic development has been identified as the major issue for Wisconsin's future economic success. Increased demand for higher skilled workers will require additional education and training. The need is for economic development and the workforce development communities to form partnerships and collaboratives that recognize and utilize the hidden workforce (older workers, immigrants, persons with disabilities, etcetera).

**IV. J. Priorities for Economic Health and Growth**

Wisconsin has prioritized a number of industries as one strategy to address its future economic health. Governor Doyle's economic development plan recognizes the need for additional training around several key industries in the state. That economic development plan has been integrated into the state's workforce development plans including the use of WIA funds. Targeted industries include: health care; construction and apprenticed craft occupations; manufacturing, with special emphasis on advanced manufacturing; and biotech and green research and development firms. There is also emphasis on assisting the Milwaukee area to be a world-class urban center, as it has been throughout its history.

**V. Overarching State Strategies**

**V. A. Leveraging Resources**

Wisconsin has implemented a number of ways to use WIA Title I funds to leverage other federal, state, local and private resources. All grants using WIA discretionary funds have some requirement of leveraged local resources. A recent example was the EISP request for proposal (RFP) that required local leveraged resources in order to maximize the available funds, encourage coordination of workforce development services, and ensure local commitment for implementation. WIA funds were identified as leveraged resources in the \$1 million Joyce Foundation Shifting Gears grant award to the DWD. Another example the Governor initiated is the private financial support for the Wisconsin Covenant. In addition, the Governor will be identifying workforce activities to help meet one of the CWI goals to have greater corporate and public support for the program changes and investments needed to achieve improved competitiveness and opportunities in the economy.

**V. B. Strategies to Address National Strategic Direction**

As discussed earlier, by strengthening regional partnerships among schools, technical colleges, public and private universities, WDBs, labor unions, businesses and the state, Wisconsin can deliver the training and coordinate resources our workers need to improve their skills, knowledge, and production, while also providing businesses with the qualified workers they need to compete in today's economy. With employers targeting the needs of each industry collectively, there will be a shared understanding regionally of the types of skills and knowledge our workers will need to fill good-paying job opportunities. The strategic directions will be advanced through the sector related WIRED and GROW activities. Through sector strategies, the state will focus on needed training to move and shape the workforce system to meet the needs of regional economic sectors.

**V. C. Strategies for High-Growth, High-Demand Occupations**

Wisconsin is pursuing a number of strategies to identify and target occupations within the state that are high-growth, high-demand and vital to the state's economy. The table below lists the 30 occupations with (1) growth rate above the statewide average of 8.0% between 2006 and 2016; (2) annual median wage is higher than the state's median wage for all jobs (\$30,395); and (3) top 30 total job openings (openings due to either new jobs or replacement needs). Among the 30 occupations, four are concentrated in the construction industry, three are production occupations, three are concentrated in healthcare, and five are computer-related and found in several industries.

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<b>High-Growth, High-Demand Occupations with Wages above the State's Median (2006-2016)</b>			
<b>Occupational Title</b>	<b>Ann. % Growth</b>	<b>Total Ann. Job Openings</b>	<b>Average Ann. Wage</b>
Registered Nurses	2.6%	2,190	\$57,376
Truck Drivers, Heavy & Tractor-Trailer	1.1%	1,530	\$38,070
Executive Secretaries & Administrative Assistants	1.2%	880	\$35,322
Accountants & Auditors	1.5%	770	\$58,374
Carpenters	1.0%	700	\$38,760
Computer Systems Analysts	2.0%	520	\$62,862
Computer Software Engineers, Applications	3.8%	460	\$69,811
Licensed Practical & Licensed Vocational Nurses	1.1%	430	\$37,618
Clergy	1.4%	400	\$44,110
Insurance Sales Agents	2.2%	390	\$65,542
Computer Support Specialists	0.9%	360	\$40,400
Welders, Cutters, Solderers, & Brazers	0.9%	360	\$33,933
Plumbers, Pipefitters, & Steamfitters	1.0%	340	\$54,268
Network Systems & Data Communications Analysts	4.3%	330	\$58,042
Correctional Officers & Jailers	1.2%	270	\$36,920
Sales Representatives, Wholesale & Mfg, Technical & Scientific Products	1.1%	260	\$74,643
Industrial Machinery Mechanics	1.5%	250	\$43,525
Printing Machine Operators	0.9%	250	\$34,716
Construction Laborers	0.9%	240	\$35,212
Industrial Engineers	2.1%	240	\$63,365
First-Line Supervisors/Managers of Construction Trades & Extraction Workers	0.9%	230	\$62,173
Network & Computer Systems Administrators	2.0%	230	\$58,793
Dental Hygienists	3.1%	210	\$55,069
Securities, Commodities, & Financial Services Sales Agents	2.0%	210	\$69,562
Child, Family, & School Social Workers	1.3%	210	\$44,162
Claims Adjusters, Examiners, & Investigators	0.9%	200	\$50,661
Painters, Construction & Maintenance	1.2%	200	\$35,263
Loan Officers	1.4%	200	\$56,163
Cost Estimators	1.6%	180	\$53,367
Bus and Truck Mechanics & Diesel Engine Specialists	1.1%	180	\$38,106

**V. D. Sustained Strategic Partnerships**

As noted earlier, the Governor will be working on cross-agency cooperative agreements for collaboration and shared resources. Specifically, the Governor has directed Commerce, DWD, and other partnership training programs to address industry-driven priorities. In addition, he has directed other training activities of the DCF responsible for Wisconsin Works (W-2)/TANF and DOC to move toward high-skilled demand occupations in their workforce-related training programs. DCF has an oversight group of partners from across the state that meets monthly and invites representatives from other departments to those meetings for cross-program coordination. For example, the DET Administrator has kept them abreast of the workforce infrastructure changes, and discussed mutual training priorities.

Also, several CWI recommendations will impact systemic partnerships at the local level including the implementation of regional industry partnerships, an approach that fosters worker training

efficiencies and industry innovation. Better use of existing resources through realignment and strategic leveraging of regional efforts will best meet employer needs, ensuring that the state produces the most talented and skills workforce in the country.

Through the Policy Academy project referenced earlier, there are five work teams composed of representatives from state agencies, business, labor, training providers, local workforce board, and WIRED partners. The teams are focused on (1) Building the state's sector strategy infrastructure; (2) Developing the future workforce: 21<sup>st</sup> Century Schools; (3) Building the skills of the current workforce: Adult Education/RISE; (4) Evaluation and benchmarking; and (5) Communications. This unprecedented strategic partnership structure will facilitate innovative solutions and disarm current impediments for a more coordinated workforce system. For example, the Wisconsin Sector Strategies Initiative will have the education, economic and workforce development state agencies adopt plans that align training and education funding to support regional industry partnerships.

**V. E. Strategies for Training in High-Growth, High-Demand Occupations**

Wisconsin's Sector Strategies Initiative will build a demand-driven system to ensure that high-growth, high-wage industries have access to employees with the skills they need to grow, and provide the skills and training for individuals to secure good paying jobs. The initiative will rebuild the system for improved responsiveness to industry demands, not program-driven; that it addresses the needs of both employers and the workforce inter-dependently; and, that it works with each industry collectively, not as individual firms. This strategy seeks to coordinate and build on Wisconsin's existing foundation in three ways:

- **Grow Wisconsin's Regional Economies:** Identifying industry sectors, facilitating meaningful employer engagement in the workforce development system, aligning education and training programs with employer needs, and creating strategies for helping businesses to prosper.
- **Grow Worker's Skills:** Promoting education and training programs for workers at all income and educational levels and at all stages in their careers, developing career ladders, and ensuring the workforce is appropriately skilled to help key regional and statewide industry sectors grow.
- **Grow System Accountability:** Improving the effectiveness of Wisconsin's economic and workforce development system by focusing multiple governmental and non-governmental organizations on common goals and aligning resources across programs with different funding sources and constituencies. Building benchmarks, agreed upon metrics of system success, and an evaluation framework that focuses and improves the work.

Another key strategy is improved targeting of training dollars through the inter-agency agreements referenced earlier.

**V. F. Strategies of Small Businesses**

Two key agencies working directly with small businesses have representatives on the CWI, the UW-Extension and Commerce. The latter also is represented on the Policy Academy sector team. In addition, the Governor launched *Accelerate Wisconsin*, a major initiative to grow start-up businesses through tax credits, grants and loans.

**V. G. Reserve Funds (set-aside funds) for Statewide Activities of Governor's Vision and National Strategic Direction**

Regional innovation must be supported and extended in order to continue to build a flexible system that can ensure that high-growth, high-wage industries have access to employees with the skills they need to grow and that workers have access to the skills and training they need to secure family supporting jobs. The Governor, endorsed by the CWI, intends to target WIA

discretionary resources to support formalized regional industry partnerships throughout the state, develop more career pathways to support the skills advancement of working adults as well as increasing short-term basic and occupational skills training. Resources will also be focused on evaluating the impact of these investments in order to ensure system efficiency. This Wisconsin's Sector Strategy initiative will build upon the existing groundwork of the WIRED, *GROW* and NGA activities.

**V. H. Strategies for Collaboration to Serve Youth**

The 21<sup>st</sup> Century Schools Team goal is to ensure local K-12 school districts, technical colleges and public and private universities work together with regional economic and workforce development initiatives to implement career pathways which prepare students for industry sector jobs.

Educational institutions, multiple agencies and workforce partners use a variety of assessment tools that provide differing results which does not allow appropriate or consistent skill identification. There is a need for soft skill and hard skill benchmarks for employers to more easily recruit talent. Therefore, the state intends to invest in a common set of tools that can be readily understood by stakeholders that addresses both soft and hard skills assessment.

Other targeted youth strategies include:

- Every school district submits an Education for Employment Plan that verifies connections to regional economic and workforce development initiatives;
- Effective models of education and industry sector collaboration are identified and promoted throughout the state;
- Evidence that programs of study are developed and implemented based on labor market information and industry sector needs; and
- Expanded offerings and enrollments in programs of study that reflect industry sector needs.

**V. I. Impediments to Achieving Goals and Strategies**

DWD reviewed the pertinent state laws and policies as part of the WIA waiver request process. This exercise has been followed-up by a more rigorous policy scan across WIA, Job Service, Veterans Service, Division of Vocational Rehabilitation (DVR), TANF, and Food Stamp Employment and Training programs. This groundwork will be used, for example, in the RISE project to identify barriers to accessing career pathway opportunities.

**V. J. Waivers and Workflex**

Governor Doyle submitted a State Waiver Plan on August 29, 2008 to DOL with the intention to remove the burdensome complexities inherent in the current WIA Title1b programs, improve system accountability, and facilitate complimentary cross-program outcomes. Issues related to these waivers are discussed throughout this document. Attachment F has the most current information on the State's waivers.

**Workflex:** Wisconsin is not a Workflex State.

**VI. State Policies and Requirements**

**VI. A. Common Data Collection and Reporting Processes**

ASSET and the Job Center Systems Data Warehouse (JCSDW) provide participant and performance information to help manage Job Center programs. To track services provided to businesses, Job Centers use JobNet Business and JCSDW to evaluate services to employers,

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provide reports to manage the Job Centers, and demonstrate accountability to business services. The use of JobNet Business is required for all Job Centers. In addition, JobNet Business is being incorporated into the upgraded JCW highlighted in VII.B.

CORe is used to track expenditure reporting and cash draws for all subawards, regardless of funding source. CORe and the associated data warehouse are used to track the financial status of grants on a daily basis. The CORe system is required for all grants with exceptions only for small, or one-time payments, or performance-based payments.

### **VI. B. Administrative Resources**

In June 2008, the DWD Secretary announced steps to transform the employment and training services to best meet the needs of Wisconsin's workers and employers in the 21<sup>st</sup> century after consulting with many partners around the state including leadership from WDBs, technical colleges, the CWI, business, labor, counties and W-2 agencies. The first major change was the redirection of funds to assessment, career advising, training and advancement opportunities for workers. The second shift was re-stationing current Job Service and Veterans staff in consolidated regional sites across the state. The priority goals that were met through this plan included consolidating services, reducing overhead, and offering an expanded scope of assistance through innovative staffing, increased service hours and cutting edge technologies.

At the state level, the veterans employment program was transferred to the DET Administrator's Office. The new Office of Veterans Services was officially approved on August 25, 2008 headed by the Assistant Division Administrator. The primary purpose for this change was to continue the prominence and visibility to the veterans program particularly given the number of veterans currently returning to Wisconsin from active duty. This new oversight will allow for increased consistency in how services are delivered to Veterans across the state and enable DET to focus more on program performance measures. Veterans staff will continue to work with one-stop partners with similar responsibilities as in the past. Attachment G shows the DET organizational chart.

### **VI. C. Universal Access**

Section 188 of WIA (20 CFR Part 652 et. al.) prohibits discrimination on the basis of disability as well as race, color, religion, sex, national origin, age, political affiliation or belief, and, for beneficiaries only, of citizenship on the basis of an individual's status as a citizen or national of the United States (US), or as an individual lawfully authorized to work in the US, or of his or her participation in any WIA Title I-financially assisted program or activity.

In accordance with the Section 188 regulations, the Governor monitors all WIA Title I-financially assisted programs. This responsibility includes ensuring compliance with the nondiscrimination and equal opportunity provisions. Section 188 regulations specify that each Governor must establish and adhere to a "Methods of Administration" (MOA) for state programs under WIA Title I. The MOA must give a reasonable guarantee that all recipients comply with the nondiscrimination and equal opportunity provisions of WIA and the implementing regulations. Wisconsin has an approved MOA with an expiration date of June 24, 2006. DWD staff conducts regular training and monitoring on the application of the MOA and Section 188 to Job Center operations to ensure universal access for all customers. Job Center service delivery is guided by the Wisconsin Job Center Standards. There are several standards that require universal access described in Attachment L.

### **VI. D. State Policies that Support a Demand Driven Approach (not mentioned elsewhere in Plan).**

See sections II.,V.C., IX.C.3.b.ii. that specifically addressed the state's demand-driven efforts.

**VI. E. Apprenticeship and Job Corps**

BWT has developed a program of basic information about registered Adult Apprenticeship for statewide leadership who work with WIA funded programs as well as manage the operations of the Job Centers. This "How to" level overview will demonstrate how Adult Apprenticeship and WIA can integrate through a seamless service delivery system. Mechanisms for delivery include:

- Presentations to WDBs;
- Training sessions for Job Center staff, initially in Milwaukee area with emphasis on services to minority male population,
- Desk aid and related materials; and,
- Workshops at industry gatherings (WIA roundtables, biennial Apprenticeship conference, and CWI meetings)

Applications for the Job Corps are available at all Job Centers. Through local agreements, Job Corps representatives hold office hours in several of the Job Centers. Many of the local apprenticeship committees also use the Job Center to post recruitment notices.

**VII. One-Stop System**

**VII. A. Quality and Competencies**

In PY 2005, the CWI supported a staff competency and credentialing system for workforce professionals through the one-stop system. The system uses the National Association of Workforce Development Professionals' competency program. WDBs are continuing funding the activities for certifying workforce staff.

As part of the Governor's Executive Order, the CWI initiated funding the Wisconsin Forward Award that successfully continues to-date. This private-sector effort with state support contributes to modernizing Wisconsin's business processes and effectiveness, enhancing the skills of Wisconsin's workforce, and strengthening the competitive position of the state's industries.

DET established weekly conference calls with WDB Directors and other one-stop workforce staff in December 2008 in order to monitor events occurring due to the economic downturn. These conversations maintained on a regular basis has kept the pulse on how the "system" is reacting, and provided appropriate statewide or localized support to maintain, at the very least, an acceptable quality level of service. The format included regular input on the following questions with answers recorded by region and industry:

- What is the volume of who's being served compared with last week, last month, last year?
- What kinds of jobs are being eliminated the most? In what kinds of industries?
- What kinds of services are most needed by customers?
- What kinds of services are we providing? What additional services would help?
- Are we getting job orders? In what kinds of jobs?
- Are employers hiring? In what kinds of industries, jobs?
- What kind of training are customers enrolling in?
- How full are the resource rooms? Workshops? Parking lots?
- What kinds of delays and gaps in service are customers experiencing?
- What kinds of complaints are you getting the most from customers?
- What special actions would help, such as longer hours at job centers, support groups at job centers, increase outreach to employers who are hiring to list, PSA sport telling customers what kind of assistance is available, where, when, Filling up open WTCS classes with dislocated, unemployed workers, other?

**VII. B. Maximum Integration for Business and Individual Customers**

DET and the CWI have had ongoing conversations on the use of technological advances to support maximum integration of service delivery through the one-stop infrastructure for both business customers and individual customers. Some initial projects were recommended at the June 16, 2006, CWI meeting in order to increase the effectiveness and scope of an electronic workforce service delivery system. Those initiatives included:

A Virtual Job Center Project (\$100,000) for the development of an Information Technology (IT)-based service delivery system. The Southwest, North Central and Northwest Workforce Development Boards (WDB) worked together on the development and implementation of an enhanced website portal and link to Job Service "call center anywhere."

A Distance Learning Network Project (\$100,000) for the establishment of an electronic training system. The South Central WDB partnered with the Educational Communications Board to create and integrate available distance learning technologies (e.g. polycom interactive video conferencing) into one training system to support the needs of job center customers and industry partners.

These pilots created the groundwork for an updated, statewide virtual job center system. DET unveiled JCW on September 15, 2008, and the DWD Secretary launched a marketing effort across the state. DET has a multi-phase schedule for implementing additional features that will ultimately provide assessment services, 'face-to-face' job search assistance through web cameras for video conferencing, video seminars and workshops from any Internet access point 24/7.

<https://jobcenterofwisconsin.com/>

Employers can now link their websites to JCW to effectively function as their employment site. For example, DWD created a customized link for IQ Industrial Group, a staffing agency in the Milwaukee area. Job seekers who search for jobs on the IQ site are automatically taken to the JCW site where they can see the jobs listed by IQ, create resumes, and apply for the IQ jobs and other jobs. This upgrade has allowed employers to be able to create their own links.

**VII. C. Job Center System - Infrastructure Costs**

Governor Doyle continued the evolution of these systems when he launched his *Next Steps*. He directed "DWD to reallocate existing resources to create a statewide Virtual Job Center that individuals and employers will be able to access on the Internet at any time" as discussed above.

Wisconsin's job center system was created nearly 25 years ago with a \$10 million federal start-up grant that provided a national model for a quality, integrated workforce infrastructure. Through the ensuing years, DWD has tweaked the system in response to fluctuations in federal support and changes in customers' needs. In 2008, the DWD Secretary implemented an infrastructure consolidation plan, also in VI.B., in order to compete in a high-tech, fast-paced global economy with dwindling workforce resources. The plan shifted funding for more training and additional services such as the Internet upgrades discussed above. Attachment H is the map of the state's job centers.

**VII. D. Reserve funds for Statewide Activities To Assist One-Stop Delivery System**

Wisconsin's current workforce infrastructure will be used to increase operational elements related to the regional industry partnerships. WDBs will play a key role in developing and implementing regional partnerships, recognizing that many of them are already linked in collaborative efforts with economic development entities and through the *GROW* and *WIRED* activities. Also, utilizing

the existing *GROW* regions for this initiative will build on their current successes of addressing the needs of both employers and the workforce interdependently. The regional industry partnership activities will address two guiding principles within the one-stop delivery system: (a) The state's consistent commitment to increasing flexibility and responsiveness of the current workforce and skills systems to meet the needs of employers and workers, and (b) The state's continued efforts for the systems to coordinate more seamlessly, and share equal commitment to the goals of building skills and responding to the skill needs of the state's leading industries.

**VII. E. Full Array of Services to Support Human Capital Solutions**

The formalized emphasis on regional planning with industry-sector driven strategies, along with state agency collaboration agreements, will improve "human capital solutions." In addition to having the WDBs coalesce their regional activities within their local plans, the WDBs are fine-tuning their core and specialized business services discussed in IX.F.2. Service to job seekers has substantially improved via the virtual job center that they can access anywhere, anytime.

**VIII. Administration and Oversight of Local System**

**VIII. A. Local Area Designations**

**VIII. A. 1. Workforce Development Areas and Timeframes**

Wisconsin has operated with 11 state designated Workforce Development Areas (WDA) since 1998. Attachment J identifies the boundaries of the WDAs.

**VIII. A. 2. Process of Designation**

The CWI was intimately involved in the reconfiguration of the WDAs implemented in 1998. Working subcommittees of the CWI included customers from the field in the redesign and formation of the WDAs and WDBs. Leadership from many of the local elected officials and input from other partners including education entities were garnered to determine the most effective boundaries for service delivery.

In 1995, statutory responsibility was given to the CWI to recommend employment and education boundaries aligned as closely as possible with the technical college district boundaries. For implementation of WIA, the state intended to continue with the 11 WDAs unless local areas requested changes. Consensus from the local elected officials and area partners confirmed that the boundaries were working well to meet the needs of employers, the workforce and effected partners. The state requested a formal notification from the WDAs' Chief Local Elected Officials (CLEOs) in the May 1999 *Local Elected Officials Guide* whether they planned to stay with the current county boundaries, or planned to convene meetings with other local elected officials to discuss possible changes to the current configuration. The letters of intent from the CLEOs were received by June 30, 1999, confirming the retention of the eleven operating WDAs.

If a local area is interested in designation as a WDA, the unit(s) of local government, or, the area CLEO, must send a request to the Governor outlining the provisions under the Act under which they propose designation, the boundaries of the proposed area and a brief rationale for the request. Once received, DWD staff will review the request to determine if it meets requirements of the Act. The request will then be posted for review and comment and given to the CWI for consultation. Once the CWI consultation is complete and provided to the Governor, the Governor will make the designation decision and inform interested parties.

This process was successfully utilized in 2007 when the City of Milwaukee Mayor requested that Milwaukee be designated as the WDA while continuing to serve the entire County of Milwaukee, and provided substantive reasons for this re-designation. The February 13, 2007, letter to the Governor was forwarded to DWD and the CWI per the above process. A public comment period ensued, and public comments were also received at the March 27, 2007 CWI meeting. The CWI advised the Governor on the request, and the Governor granted the Mayor's request. Shortly thereafter, a transition period began that included a new oversight board, the Milwaukee Area Workforce Investment Board (MAWIB).

**VIII. A. 3. Appeals Process**

CLEOs may file an appeal with the Governor and/or the Chair of the CWI within 30 days of notification that the request for designation was not approved. The Appeal must provide the basis for challenging the failure by the Governor or the CWI to approve the designation request, and cite a failure by the Governor or his/her designee to properly consider the criteria enumerated clauses in WIA 116(a) (1)(B) (i)-(v).

The Governor or the Chair of the CWI, could then refer the Appeal to the Executive Committee of the CWI for review and a determination whether the criteria were appropriately applied to the request for designation. The Governor or the Chair of the CWI is required to issue a final decision of the designation request within 15 days. The final decision, if unsatisfactory to the appealing parties, could be further appealed to the Secretary of DOL as provided in WIA 116(a)(5).

**VIII. B. Criteria for Local Board Membership**

In addition to the federal requirements of WDB membership and processes, Wisconsin has established the following criteria:

- To ensure demographic diversity on the local boards, membership must be comprised of at least 20% female members;
- If there are at least 3% minority population in an area, there must be at least one minority representative appointed to the local board; and,
- To ensure that business members are those with employment opportunities in the area, we strongly encourage that the industries making up more than 10% of the industries in an area should have members equal to at least one per every 10% (e.g., 33% manufacturing would mean at least three business representatives from manufacturing businesses; 25% service would require at least two service industry representatives.) If a WDA chooses not to follow this guideline, they must provide an explanation as to why they used a different industry mix (e.g., focusing on particular industries to deal with the needs of the area).

**VIII. C. Capacity Building of Local Boards**

As referenced earlier, the Secretary and DET staff meet with the WDB Directors on a regular basis to discuss needs and convey information and new directions from the Governor and DWD. WAJTE also receives a small grant from the WIA state set-aside funds to help support the capacity of the WDBs. They have also renewed their affiliation with the Wisconsin Counties Association for improved working relationships with the local elected officials. Finally, the Wisconsin Workforce Development Association composed of WDB Chairs, LEOs and WDB Directors meet quarterly with DWD representatives in attendance.

## VIII. D. Local Planning Process

### VIII. D. 1 Oversight

DET will issue *Local Plan Guidelines* for the final year of the five-year plan cycle. The WDB's WIA Title I Local Plans will be reviewed by DET, and a summary shared with the CWI's Executive Committee. If all requirements are met, they will be approved by DET. DET will send letters to the WDBs providing instruction for negotiating and reaching agreement between the WDBs with the CLEO and the state on the local performance standards for PY 09, and the common measures youth performance levels PY 08.

### VIII. D. 2. How Does the Local Plan Approval Process Ensure that Local Plans are Consistent with State Performance Goals and State Strategic Direction?

BWT drafted the PY 09 local plan guidelines coterminous with the development of the State Plan that includes the pertinent over-arching visions for implementation at the local level. The guidelines include integrated strategies that advance *GROW* activities and the Governor's *GROW* Wisconsin Plan as well as the CWI's recommendations to "identify demand/dynamics of the industry sectors, their employers' needs, a description of how the plan meets those needs, and how the workforce system is re-designed regionally to upgrade service delivery with metrics and accountability measures."

Within the context of a demand-driven *GROW* regional economy, the local plan guidelines includes a section on the WDB's efforts to engage in the development of a regional sector or cluster-based strategy. WDBs are asked to:

- Describe the progress towards aligning the services of the local workforce system, economic development and education systems to support a regional based sector strategy, and obtaining cross-agency cooperative agreements for collaboration and share resources.
- Describe how the WDB will identify and work with key industry partnerships where they exist within the region, and coordinate and invest in partnership infrastructure where they are not developed. Establish goals for the WDB's efforts with industry partnerships.
- Identify how the WDB plans to better align its resources to meet the training and employment needs of key industry sectors in the region.
- Describe the methods to be used within the *GROW* region to measure the progress toward the goals (above.)

Specific to *GROW* worker's skills issues, the local plans also need to describe the:

- Policies adopted or planned for aligning training initiatives and Individual Training Accounts (ITA) to sector strategies and demand occupations.
- Goals established for these alignment activities.
- Efforts to encourage bridge programming, contextual remediation training and chunked curriculum for occupational training as described in the Wisconsin RISE initiative.

The local plan guidelines also include implementation details in response to the state waiver approvals:

- Describe any plans for transferring up to 100% of the funds between the adult and DW programs. If planned, include the circumstances applicable to a transfer

request, the measures to assure no loss of service to the original program population, and the expected impact on program performance.

- Describe any plans for using up to 10% of local area formula funds to provide statewide employment and training activities including incumbent worker training.
- Describe any plans for requesting a waiver of the competitive procurement process for youth providers and what performance improvements are expected.

Finally, to piece together the varying regional workforce activities with the eventuality of merging into a broader "system", the local plan guidelines ask to describe the WDB's current or planned coordination and collaboration efforts with MSSC, Commerce's Customized Labor Training, WTC's Advancement Training Grants, and RISE.

### **Regional Planning (1-3)**

As part of a more formal regional planning effort based on the Governor and CWI's goals, BWT staff reviewed the current regional activities to determine common elements including the WIRED reporting requirements and MSSC initiatives. While all WDBs have structures and multiple activities around regional industry partnerships, the local plans will attempt to capture these in a cohesive way in order to determine additional needs to further support additional targeted training to increase the talent pipeline. This is an initial step toward DWD requiring regional planning with specific guidelines as state policy.

DWD and WDBs continue to have inter and intra-state activities with regions corresponding to the rich-cross border employment and educational resources such as the large metropolitan areas of Chicago and the Twin Cities. For example, the Governor assessed the commuter patterns related to employment and targeted several major infrastructure transportation corridors for improvements including interstate and mass transit systems.

DET and CWI had identified measureable accomplishments and objectives for the *Grow* grants and provided guidance with Regional Metrics Benchmarks (a set of 36 metrics to measure overall regional economic health). These previous activities will serve as groundwork for a second phase of specific regional performance measures and required collaboration. This next step will also occur after DWD and partner agencies complete their work related to cross-agency common goals and cooperative agreements, as discussed in I.B and III.C.

## **VIII. E. Allocation Formulae:**

### **VIII. E. 1. Methods and Factors**

Wisconsin uses the with-in state allocation method described at Sec. 128(b)(2) for WIA Youth funds. The Youth discretionary allocation methodology described at Sec. 128 (b)(3) is not used.

With-in state allocation of Adult funds complies with Sec.133 (b)(2). Wisconsin does not use the Adult employment and training discretionary allocations methods described at Sec. 133 (b)(3).

For a detailed description of Wisconsin's allocation process, see Attachment P: "Wisconsin WIA Allocation Process: *The Operational Guide, Protocols & Checklist to Develop the Annual Allocations for Workforce Development Areas* "

**VIII. E. 2. Equitability**

WIA funds are distributed equitably and significant funding shifts among Workforce Development Areas (WDA) are minimized by adhering to the funding methods described in WIA Sec. 128(b)(2) and Sec.133(b)(2) for Youth and Adult programs respectively. As provided for in these sections, Wisconsin ensures that each WDA receives a minimum 90% of its prior two-year average allocation percentage. This process is known as the 90% hold-harmless provision.

Additionally, Wisconsin uses a hold-harmless provision for dislocated worker programs. In PY2000, the Executive Committee on behalf of the CWI agreed to extend the hold-harmless provision from the Job Training Partnership Act's Dislocated Worker program into the WIA program. The provision ensures that each WDA receives 85% of its allocation percentage from the prior year.

**VIII. E. 3. Formula**

Sixty percent of WIA funds allotted for Dislocated Worker programs will be distributed to WDAs using the formula established by the Governor. The Governor’s Dislocated Worker formula addresses the six elements outlined in Section 133 (b)(2)(B). The following chart illustrates the formula:

Allocation Factor	Weight Assigned In Formula	Data Source(s) and Time Period
Unemployment Concentrations	25%	A WDA had to meet or exceed the state unemployment rate or have 10% or more of the unemployed workers in the state in order to qualify for this factor. Qualifying WDAs receive a prorated share based on the total number unemployed located in WDAs meeting the threshold.
Declining Industries	25%	Each WDA receives a prorated percentage of the decline in employment by industry based on its share of the state’s total decline in employment. Employment decline is measured by comparing WDA employment by industry in the comparison year (the most recent year for which data is available) to WDA employment by industry in a reference year (5 years prior to the comparison year).
Farm Hardship	12.5%	WDAs receive a prorated percentage of the total loss in the number of farms from a 1982-84 base period to the most recent year for which data is available.
Plant Closing/ Mass Layoff	12.5%	Each WDA receives a prorated percentage based on the relative number of persons reported as receiving notice of lay off in Plant Closing/Mass Lay off notices in the WDA compared to the total reported for the state.
Long-Term Unemployment	18.75%	Each WDA receives a prorated percentage of the total number of persons who received unemployment compensation payments for at least 15 weeks in a benefit year.
Insured Unemployment	6.25%	Each WDA receives a prorated percentage based on the relative number of persons living in the WDA who have established an Unemployment claim as compared to the number of claimants in the state.

**VIII. E. 4. State Board Involvement in Development of Allocations**

The original WIA allocation policy was reviewed by the then CWI Ad Hoc WIA Committee in 2000 with input from WAJTE and local elected officials through the Wisconsin Counties Association.

Local Elected Officials and CWI members will receive notice of the revised allocation process for PY2010 for review and comment. The underlying policy established by the CWI in 2000 is not changing though the definitions and data sources for the dislocated worker formula are being updated.

## VIII. F. Provider Selection Policies

### VIII. F. 1 Policies, Procedures, and Performance

The policies and procedures, applied by local areas, for determining eligibility to be on the Wisconsin's Statewide List of Eligible Training Programs and Providers (ETP List) are found in the Initial Eligibility policy. It requires all training providers to complete a standard application. Following the requirements of WIA Section 122, training providers covered under Title IV of the Higher Education Act and the National Apprenticeship Act only have to submit an application to be eligible for the ETP List.

The group of training providers not covered by either act must have applications approved by the WDB before it is submitted to the state for final 30 day review and inclusion on the ETP List. Following are the criteria for approval:

- The application is complete;
- The description of the program of training services is complete;
- The performance information addresses: 1) program completion rates for individuals participating in the program; 2) percent of individuals who obtain unsubsidized employment; and 3) wages at placement in employment;
- The performance information is for the most recent 12-month period;
- The application contains the required cost information;
- The training provider has not violated any conditions of WIA; and
- A training provider of Certified Nursing Assistant programs must be approved by the Department of Health Services (DHS) and be on its registry before it can be approved and placed on the ETP List.

Currently, Wisconsin is not required to use collected performance data to determine continued eligibility for training programs found on the ETP List. In 2002, DWD received a waiver to postpone implementation of the Subsequent Eligibility provision of WIA. The waiver was subsequently extended in separate actions through June 30, 2009. One consideration for this waiver request was the impact WIA reauthorization would have on training provider performance data collection and reporting requirements.

Since the extension of the time limit for Initial Provider Eligibility was granted, DWD completed construction of an ETP database, and created a web-based Interface that dramatically improved dissemination of ETP information to training seekers and case managers. <http://www.wisconsinjobcenter.org/ita>

The website contains program specifics for all eligible training programs, links to current Wisconsin policies, and two "Scorecards" with detailed information on training programs and training providers. The Scorecard data is returned to the ETP database from the ASSET case management system. Case managers record program and training provider information specific to ITA training voucher holders. Information is anonymously reported for participants who complete or drop out of training, and their occupational outcome. The use of this information in guiding future eligibility determination of training programs and providers is possible, but remains in question because of data constraints. When the decision point is reached for the role these Scorecards may play, a workgroup will be formed to consider performance, and recommendations to DWD will be made. A similar convention was followed in 2002, a group known as the Subsequent Eligibility Workgroup.

**VIII. F. 2. Solicitations**

The process for soliciting comments and suggestions in the development of the Initial Eligibility policy followed the same route that all WIA development activities took. A WIA workgroup on training issues and a separate workgroup on DW met several times during the summer months of 1999 to offer suggestions. Comments also were sought via the department's WIA web-site. All suggestions were considered in developing the Initial Eligibility policy. When a draft was completed, it was sent along with the draft application to the employment and training community for comments. Included in the audience were unions, technical colleges, private for profit training institutions, and all WDBs.

In 2001, DWD formed a Subsequent Eligibility Workgroup. It consisted of representatives from WDBs, WTCS, unions, Wisconsin Educational Approval Board and private for profit training institutions. They met throughout 2002 and developed policy recommendations concerning the ETP List. Included in their policy recommendations was Wisconsin's request for a waiver from subsequent eligibility.

DET's standard procedure for issuing a new policy is to develop a draft and then send it to the employment and training community for 30 day review and comment. Comments from the review are incorporated into the final policy.

**VIII. F. 3. Maintenance of State Training Provider List**

Wisconsin's ETP List is maintained by staff in the BWT. Once an application is approved by one of Wisconsin's 11 WDBs, it is sent to BWT for final review. BWT staff is granted 30 days to review WDB-approved training provider applications, by policy. If a problem is identified, the application is returned to the WDB for further clarification, completion or correction. If no problem exists, the training program and the corresponding details about the training provider are placed on Wisconsin's ETP List. Changes to the ETP List for training providers' details or their programs are solicited by WDB representatives and reported to BWT.

Enhancements to the ETP List and improvements in the dissemination of training program information have been ongoing since its debut in 1999. These improvements were guided by customer feedback. BWT maintains a mail distribution list for notification to keep WDB representatives and other ITA-interested parties informed of changes to ITA-related aspects of the WIA.

**VIII. F. 4. Appeal Process**

A procedure was established in the state's initial year policy for training providers to appeal a denial of their eligibility to be on the ITA list. It also addresses appeal situations for a provider's termination and removal from the state list. The policy includes the following specific section on the appeal process:

"Training providers have a right to appeal a local or state decision denying them eligibility or terminating them on the local and state ETP List. The primary reasons for denial and termination, as cited in WIA section 122 and Regulations 663.510, are a training provider: 1) has not met performance standards, 2) has provided inaccurate information, and 3) has "substantially" violated the Act. In all cases, consultation between the state and WDBs must take place before action can be taken against the training provider.

When an eligible training provider is terminated from the list, the following procedures will be followed:

- The training provider will be notified in writing of the action to terminate, and the cause for the termination. Depending on the discussion between the local WDB(s) and the state, one of these entities will author the letter. It will be in a prescribed format agreed upon by both entities.
- The letter will say that in 60 calendar days from the date the letter was signed, the training provider will be removed from the state ETP List.
- The letter will also inform them of the process they follow to appeal the action."

**VIII. F. 5. Grants and Contracts Processes**

The initiatives funded under the WIA Title 1 funds are developed by the DWD Secretary in coordination with the Governor's *GROW* and *Next Steps* initiatives and CWI priorities. In support of the One-Stop infrastructure, the majority of grant awards are offered primarily through the 11 WDBs. Grant initiatives are typically developed through a RFP process with collaboration from other affected state agencies, and local business leaders where appropriate.

**VIII. F. 6. Local Criteria for Youth Activities**

BWT issued a revised state policy on the approved waiver that would allow the elimination of the competitive procurement process for selecting youth providers in rural areas only if the WDB provides substantial rationale for state approval. Per the DOL approval letter, the policy also includes the requirement of on-going oversight to those affected WDBs. BWT already has extensive monitoring activity. For example, BWT updates the youth service providers list for each WDB once a year. WDBs are required to keep BWT informed of current information on each of their youth service providers through their local plan and modification process. DWD provides this on its WIA website (<http://www.dwd.wisconsin.gov/dwdwia/youth/default.htm>).

The information collected includes WDB counties covered by a provider, their contact information, whether they serve in-school and out-of-school youth as well as younger and older youth. BWT monitors WDBs to ensure youth programs' compliance and provides technical assistance and training (TAT) to local boards on the RFP process and how to solicit and contract with quality youth service providers and determine their ability to provide the ten required program elements. WDBs use several criteria to rate the success of youth service providers which helps them identify effective and ineffective activities. WDBs also monitor each youth service provider on a regular basis to ensure they are providing the services listed in their contract.

**VIII. G. One-Stop Policies**

**VIII. G. 1. Coordination of Partners and Wagner-Peyser Funds**

The Wisconsin One-Stop delivery system involves all WIA mandated partners described in 20 CFR 662.200. WIA requirements and state policies (such as the 2009 One-Stop Requirement and Standards of Service) continue to drive collaboration and coordination efforts. Roles and responsibilities are formalized through the development of local MOUs, which dictate how services will be coordinated and offered in an integrated manner.

DWD administers Vocational Rehabilitation, WIA, and Wagner-Peyser programs, and maintains an inter-agency collaboration team to further enhance coordination between programs. DWD also works closely with DCF to ensure coordination with TANF related work programs, many of which continue to be offered through the One-Stop system. For WIA and Wagner-Peyser programs, DET ensures that all policy directives to local partners and staff encourage or require integrated service delivery. This ensures high-level, non-duplicative services to customers.

Wagner-Peyser's role in the One-Stop is defined primarily by statewide directives regarding Job Service operations, the WIA plan, and the local MOU. Priorities are changing in order to respond to the changing economy and local labor markets. As referenced elsewhere, there is now a stronger focus on re-employment, assessment, career counseling, and referral to training. Job Service continues to use the labor exchange as the foundation for developing the skills and talent of all One-Stop customers. Job Service is also focusing more effort on providing these services via multiple access points, including the new JCW and statewide call center system.

**VIII. G. 2. Improvements and Technical Assistance**

BWT helps partners state-wide identify needed improvements primarily through the annual WIA on-site monitoring. This is an extensive process that includes substantial follow-up with the WDBs on policies and practices. Two Workforce Program Roundtables conducted by DWD are anticipated in PY 09 that will bring together adult, DW, youth and veteran local program staff and managers to work collaboratively on workforce improvements.

**VIII. G. 3. Additional Mandatory Partners**

At the time of WIA implementation, the Governor mandated that the TANF program/W-2 program be required as a One-Stop partner. Staff from W-2 agencies are physically integrated into the Job Centers throughout the state either on a co-location, itinerant-staffed or network basis. In Milwaukee, a contracted W-2 agency headquarters actually is a designated comprehensive job center. While the level of physical integration varies throughout the state, all W-2 agencies that administer the W-2 program are expected to coordinate with other Job Center partner programs in their WDA to maximize programmatic resources and eliminate duplication of services. Referrals to other programs and dual-enrollment of appropriate individuals ensures that W-2 participants have access to the spectrum of services available through Wisconsin's workforce development system. As a mandated partner, a W-2 representative also serves on each of the 11 WDBs.

**VIII. H. Oversight and Monitoring Process**

DET has staff called Local Program Liaisons (LPL) who oversee and monitor the activities of Wisconsin's 11 WDBs. Each LPL is assigned specific WDBs for which they provide WIA program oversight, technical assistance and monitoring to achieve Wisconsin's vision and goals of continuous improvement of the WIA Program.

Criteria guiding their roles include:

- Compliance with program policies and procedures and operation within the parameters established by WIA Law, Federal Regulations, and DWD's *Workforce Programs Guide*;
- Provision of quality services to jobseekers and employers according to the approved state WIA plan and local WIA plans;

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- Entry of valid data into Wisconsin's WIA participant tracking system called ASSET;
- Provision of accurate eligibility determination and supporting documentation in case files;
- Performance outcomes are at the meet or exceed level;
- Provision that case file documentation meets DOL requirements for annual data validation;
- Provision that WDBs are implementing corrective action steps identified in DOL audits, state monitoring reports, and corrective action plans developed as a result of failed performance measures;
- Provision of appropriate expenditure levels for grants; and
- Compliance with all program policy, including priority of service for veterans.

LPLs complete the following oversight and monitoring activities and procedures on an ongoing basis to ensure the above criteria is being met:

- Attendance at local WDB meetings, WDB subcommittee meetings, One-Stop Center meetings, and case managers' meetings;
- Review/approval of/sign-off of local WIA plans and modifications and subsequent grant awards;
- Certification/recertification of local WDB member composition;
- Review/approval of the WDBs' local service delivery policies;
- Provision of technical assistance to WDBs;
- Review of WIA expenditure levels;
- Review of WIA performance outcomes;
- Assistance in annual renegotiation of performance measures;
- Review and approval of ASSET data changes that are impacted by policy and performance;
- Attendance at meetings with DWD policy staff to relay local WDB issues and to collaborate on plans for resolution;
- Participation in DOL monitoring visits; and
- Review and approval of corrective action plans if required of the WDB and follow-up to ensure corrective action steps are resulting in improvement.

LPLs complete formal on-site monitoring of their assigned WDBs on an annual basis through the following procedures:

- Monitoring guides are developed and revised on an annual basis depending on criteria described above;
- A monitoring survey is sent out to WDBs to complete and return to their LPL for review prior to the on-site visit;
- LPL completes a desk review of the monitoring survey and attachments submitted by the WDB, conducts on-site program interviews with WDB staff, and reviews randomly selected adult, DW, and youth participants' case files and their corresponding ASSET records;
- LPLs issue a monitoring report to the WDB within 30 days of the on-site review. Findings, observations, and comments are included in the monitoring report. Findings include required actions to be taken by the WDB to correct the situation. The WDB is required to respond in writing to acknowledge and specify their corrective action steps;
- LPLs monitor to ensure the corrective action is implemented; and
- LPLs produce a final summary of monitoring results; these results are shared with state managers and policy staff. Technical assistance, training efforts, and policies are then produced in accordance to needs and issues identified during the monitoring process.

Beyond ongoing fiscal oversight, DWD conducts monitoring of each WDB's administrative controls and procurement practices. This includes such areas as cost allocation, sub-contracts,

single audit, WDB policies and controls, direct labor and costs charged by WDBs, fiscal reporting practices, and procurement methods. Reviews may be on-site or desk top. DWD determines the type of review based on prior audit/monitor results, amount and type of funds and size of agency.

The DET Equal Opportunity Specialist provides ongoing civil rights oversight of the WDBs. This is done through desktop review of the Equal Opportunity MOA Documentation as certified bi-annually by the DOL Civil Rights Center. WDBs receive an on-site monitoring visit at least once every two years. Each year DET monitors approximately half of the WDBs and the next half the following year. DET has adapted the National Association of State Workforce Agencies Equal Opportunity Committee Monitoring Review Guide to conduct these reviews.

In addition, LPLs conduct monitoring of Trade Adjustment Assistance (TAA) programs and assist the DWD DW Section in monitoring National Emergency Grant (NEG) grants. By having LPLs involved in the monitoring of all DW related programs, DWD can ensure that TAA and NEG are appropriately interacting with WIA DW Formula and Special Response grants.

LPLs also oversee and monitor various other WIA and non-WIA funded grants related to employment and training such as the Milwaukee summer youth employment projects, and ex-offender employment projects. Attachment K are the monitoring guides.

**VIII. I. Grievance Procedures**

The grievance procedure is Attachment I.

**VIII. J. Policies and Procedures for Effective Local Systems**

**VIII. J. 1. State Guidelines for Selection of One-Stop Operators**

One-Stop Operators (OSO) in each local area are designated and certified by the WDB with the agreement of the CLEO. The OSO is designated or certified through a competitive process or under an agreement between the WDB and a consortia of entities that includes at least three or more of the required One-Stop partners identified at Sec. 662.200. (WIA sec. 121(d)). The WDB may be designated or certified as the One-Stop operator only with the agreement of the CLEO and the Governor. The only local board approved as an OSO is the Southwest Wisconsin WDB (limited by a CLEO agreement).

**VIII. J. 2. Impasse Procedures**

DWD emphasizes full and effective partnerships between local WDBs and Job Center partners. WDBs execute a Memorandum of Understanding (MOU) describing each partner agency's role in addressing the workforce issues identified in the plan. Local areas may request assistance in negotiating the MOU from DWD or the state agency responsible for administering the partner program, the Governor or other appropriate parties. Local negotiation efforts that have taken place must be documented at the time of the request. In situations where a required partner has not signed an MOU, the following procedures have been developed per WIA regulations:

**Process to Resolve Impasse Situations**

In situations where a required partner has not signed an MOU, the following procedures have been developed per WIA regulations:

- **Initial Report of Impasse.** The WDB jointly with the CLEO and the affected partner must report in writing that an impasse has occurred to:

- The state DWD;
- The state agency responsible for administering the partner's program, and if there is no administering agency at the state level, then to the appropriate federal agency; and,
- The State Council on behalf of the Governor.
- **Report Requirements.** This written notification must include:
  - Which partner/agency(s) are involved,
  - What WIA services are involved,
  - What the specific issues of disagreement are,
  - Documentation of negotiations and what efforts have taken place to reach agreement that demonstrate a good-faith effort of both parties; and,
  - Written acknowledgement that this notification begins a five-working-day "best efforts" period in which the parties will continue to make good faith efforts to resolve differences. This five-day period will precede active state-level intervention. If an MOU is completed within this period, both parties and the CLEO will notify the parties in 1 a-c above.
- **First Level-- Informal Discussion at the State Level.** Upon initial receipt of the written notification, the involved state agencies will proceed to schedule meetings that would begin after the five-working-day "best efforts" period. DWD will make this the highest priority and a review team will:
  - Request any additional documentation from the local parties and involved state agencies within three working days of receipt of the report.
  - Prepare options for resolution at the first state level meeting with involved partners.
  - Convene meetings and attempt to resolve the impasse.
- **Formal Negotiation at the State Level.** If after five days at the informal discussion level, the impasse has not been resolved, then an impartial entity, such as the Wisconsin Employment Relations Commission, will be enlisted to negotiate between the parties.
- **No Resolution.** Failure to execute an MOU by July 1, 2000, will result in:
  - The Governor and the responsible state agency must report this to the Secretary of Labor and to the head of any other Federal agency with responsibility for oversight of a partner's program.
  - The involved partner will not be permitted to serve on the WDB, and
  - The local area in which a WDB has failed to execute an MOU with all of the required partners will not be eligible for state incentive grants awarded on the basis of local coordination of activities under 20 CFR 665.200(d)(2).

#### VIII. J. 3. Local Board as Service Provider

Wisconsin's vision, consistent with DOL guidance, is for WDBs to provide strategic planning and direction for the workforce investment system within their WDA along with *Grow* regional coordination. This vision does not include boards providing direct WIA Title I-B services. Therefore, DWD has provided guidance to local areas on this issue in a policy and procedure that outlines the criteria by which local areas can seek the Governor's approval to provide direct services. No WDBs are currently providing direct services as defined by this policy.

#### VIII. J. 4. Training Providers Performance Information

Wisconsin follows WIA section 122(h)(2) concerning the collection of performance information from training providers of on-the-job and customized training. It gives the

Governor discretion to decide if performance information will be collected. Wisconsin has directed the local OSO to develop performance criteria and collect performance information concerning retention, wage levels and benefits. The OSO must determine if the employer meets the performance criteria. The list of providers that meet the specified criteria, along with the relevant performance information must be disseminated through the One-Stop delivery system. Providers determined to meet the criteria are considered eligible providers of On-the-Job Training services.

Wisconsin created a new web-based interface (<http://www.wisconsinjobcenter.org/ita>) that contains two "Scorecards" with detailed information on training programs and training providers. The applicability of this information toward guiding potential on-the-job and customized training eligibility performance is possible should the Governor opt for a discretionary change.

**VIII. J. 5. Reallocation Policies**

The state has a process in place for recapturing and reallocating funds from the local areas. If a WDB is below the 80 percent obligated at the end of year one, reallocation will occur. The amount recaptured must be based on the amount by which the prior year's unobligated balance of allocated funds exceeds 20 percent of that year's allocation for the program, less any amount reserved for the cost of administration (up to 10 percent). Funds not fully expended after the end of the two-year grant period will be deobligated. The DET will issue these recaptured amounts as additional WIA grants to WDBs that have expended all their funds during the two-year grant period and will be able to expend the additional funds by the end of the third year of the grant. DET allows grantees 60 days to close their grants. The recapture process will occur after this 60-day period.

**VIII. J. 6. Transfer Funds**

This transfer of WIA funds will be treated similarly to other budget modifications. The WDB must submit revisions to its program plan, client data and budget. The state will review the modification and either approve or deny it. There is an edit in the DWD fiscal system that does not allow transfers to exceed the percentage allowed by law. Any transfers in excess of the current 30% limit are allowable through June 30, 2009, under a waiver granted by DOL (V.J.). The current edit check in the DWD fiscal system will be manually overridden for these agencies only.

**VIII. J. 7. Special Needs Populations**

The basic structures for serving populations with special needs are addressed through the One-Stop delivery system and demand-driven strategic partnership planning structure. In serving groups with special needs, Wisconsin's WIA policies and procedures follow:

- Provide tools and strategies to strive towards universal access to core services under WIA: Key areas addressed are language, physical disability, geographic location, cognitive barriers, reading level and economically disadvantaged;
- Develop plans to address areas lacking accessibility that will not be implemented immediately due to undue hardship or lack of feasible solutions;
- Emphasize monitoring by WDBs to ensure special needs groups are receiving adequate level of service;

- Provide technical assistance on assessment services to guarantee that solutions for barriers to employment are addressed;
- Promote increased referral of displaced homemakers to Carl Perkins Technical College Program by Job Centers;
- Explore strategies to continue to deliver Disability Program Navigator Initiative services in local Job Centers to assist people with disabilities in gaining and retaining employment;
- Explore partnership issues related to development of information and referral systems and coordinating outreach efforts to underserved populations;
- As mandated by WIA 188, Job Centers will provide effective communication. Staff will participate in annual training to ensure familiarity with the variety of auxiliary aids and formats available to consumers as well as ways to respectfully communicate directly with the person with the disability;
- Job Centers will ensure that all consumers receive a comprehensive list of communication resources and formats available to help enhance universal access to the following materials:
  - The orientation/intake process;
  - Marketing/recruitment/orientation materials;
  - Handouts and brochures;
  - The One-Stop's website; and
  - Alternative formats (tapes, Braille, etcetera).
- Job Centers must ensure that marketing and recruitment strategies encourage individuals with disabilities across the full spectrum of physical, mental, cognitive, and sensory disabilities to seek services or apply for employment.

**VIII. J. 8. Sixth Youth Eligibility Criterion**

The state has not established additional eligibility criterion. WDBs have developed their own policies included in the Local Plans.

**IX. Service Delivery: Approaches**

**IX. A. One-Stop Service Delivery Strategies:**

**IX. A. 1. Service Provision by Each Partner**

The Job Center MOUs describe the services offered through the One-Stop delivery system and includes partner programs' roles and responsibilities for the delivery of those services. The One-Stop Job Center requirements and standards of service provide state direction on how the OSO and its partners will deliver services.

**IX. A. 2. Youth Formula Programs**

All Wisconsin Job Centers provide access to youth services whether the youth provider is located in the job center or not. Each resource center located in Job Centers has an area dedicated just for youth.

Several WDAs have developed youth specific resources and/or programs in the Job Centers. For example, Job Centers in Fox Valley WDB have provided separate areas for youth, web sites geared towards youth, specific information and materials for youth and youth bulletin boards. MAWIB has a career center/resource room specifically for youth.

DET continues to focus technical assistance efforts to encourage more youth services provision in Job Centers, and has a policy update 04-01 – Accessibility to Title I Youth Services through Job Centers. The following guidance was provided for comprehensive Job Centers:

- Provisions for assisting youth programs into the MOUs of One-Stop partners;
- Provide separate, well-identified areas in the Job Centers just for youth;
- Provide a bulletin board to post workshops and training opportunities or information just pertaining to youth;
- Create a website devoted to youth;
- Job Center resource rooms have materials and resources that are appealing to youth;
- Require youth service providers to bring youth participants in any service location in the job center network to use Career Education tools, e.g. WISCareers (<http://wiscareers.wisc.edu>), and be trained in resume writing, grooming for the workplace, interviewing, employment skills, self-management skills, transferable skills, and where to find labor market statistics; and
- Teach youth financial literacy, including the wise use of credit and building financial assets.

**IX. A. 3. Minimum Service Delivery Requirements**

Wisconsin's One-Stop delivery system requirements are delineated in Attachment L.

**IX. A. 4. Tools and Products**

IX.B. and X.A. lists examples of the products that support service delivery in the one-stop system. In addition, a new effort by the Office of Economic Analysis (OEA) has been initiated. A monthly bulletin has been created to replace the weekly economic updates provided to workforce partners. The intention is to provide a more practical, detailed and time-consistent collection of Labor Market Information (LMI) and DWD program data. These bulletins are also issued at approximately the same time that the statewide unemployment rates are released.

**IX. A. 5. Models/Approaches**

DET promotes consistency of service across the 22 Comprehensive Job Centers through the service delivery standards (Attachment L) and outcome; by providing automated systems for service tracking; and, by providing training on the roles, responsibilities and practices Job Center staff should employ in the conduct of their jobs.

**IX. B. Workforce Information**

**IX. B. 1. Integration at State and Local**

The CWI's primary goal is to "promote the use of economic and labor market information to ensure evidence-based policy recommendations to guide the state's broad workforce development system." A critical insight gained under this approach is that jobs are filled on a one-job-at-a-time basis. At the case management level this means more effort directed at helping job seekers understand the labor market in which they are seeking employment and identifying employers that create sustainable high wage/high demand jobs. From this perspective, players at all levels of the program delivery process can focus on appropriate skill development.

**IX. B. 2. Dissemination of Information**

The DWD follows a broad strategic approach for the delivery of workforce information to principal customers. Local workforce information is available through easy-to-use electronic delivery systems. The use of these systems assures the data can be easily reproduced and analyzed by customers. Local DWD labor market analyst can provide interpretation of data, guidance, and answering customer questions will be a primary focus for DWD local labor market and research analysts. DWD maintains the ability to provide workforce information via printed copy for those customers who are unable to access electronic data. Virtually all requests are handled via electronic media. The secondary component of the strategic approach for workforce information delivery is the ongoing focus on understanding customers' needs. DWD will continue to interact with local WDBs and statewide workforce investment customers to identify and close gaps in between available data and data requests.

Each of Wisconsin's Job Centers has a Resource Room that is the locus of the WIA's core services. Within the Resource Room, job seekers have access to electronic and hardcopy tools to research career decisions and to assist in their job search. The hardcopy tools available include occupational reference books, occupational briefs, career-related periodicals, occupational biographies, and videotapes. Other types of materials that are available include assessment instruments, employment data, and transferrable skill information. In addition, each Resource Room has a staff person who has received at least five hours of training on using labor market information and related occupational information to help job seekers in their career search.

Wisconsin's labor information website, WORKnet disseminates a wide range of historical and current market information to Job Seekers, Employers and Workforce Development professionals. The URL is <http://worknet.wisconsin.gov/worknet/>. Job Center staff and a wide range of other governmental organizations have been trained to use WORKnet and other LMI tools.

**IX. B. 3. Core Products and Services Plan**

WORKnet, Wisconsin's Workforce Information Database (WID), continues to be a key tool in our workforce information system. WORKnet is an attractive, data-rich, and user-friendly resource for job seekers, employers, workforce professionals, and economic development professionals. The information provides a firm foundation for efforts to *Grow Wisconsin* in a sustainable and ecologically sound manner.

- **Produce and Disseminate Industry and Occupational Employment Projections**  
State government agencies use projections data and analyses in the evaluation of existing, and in the development of additional, training programs such as those offered by the Bureau of Apprenticeship standards, Division of Vocational Rehabilitation (DVR), and Corrections. Wisconsin Technical Colleges, the University of Wisconsin, and several of the state's private colleges use projections to aid in the development and evaluation of their curricula. Projections tailored to WDAs are used by WDBs to make decisions about training dollar allocations. Guidance and career counselors, students, and job seekers use the projections to explore occupations and careers. Researchers use the data in their analyses of Wisconsin's labor market, and employers use the data as indicators of demand for various occupations. Projections staff provide training on projections products to local WIA planners, program managers, employer services staff, and case management supervisors. The purpose of the training is to facilitate better understanding of projection products and how to use them.

- **Provide Occupational and Career Information Products for Public Use  
Occupational Employment and Wage Publications**

The Office of Economic Advisors (OEA) was established to assist economic data users to better understand the relationships between labor markets and other economic and demographic specifics. OEA helps users interpret labor force data and focus on the issues and trends influencing employment growth in Wisconsin. OEA publishes monthly and annual reports that provide an overview of county and state trends. These include *Workforce Observations*, *County Workforce Profiles* and *Regional Occupational Projections*. Additionally, the OEA works with the CWI to develop information for use in guiding the goals and strategies of CWI. Since the re-formation of the CWI, the OEA has collaborated with them to develop necessary statistics to measure the impact of workforce investments. Among the pieces developed was a quick reference index of workforce information sources to be used by the CWI committees in the establishment of measurable goals.

- **Ensure that Workforce Information and Support Required by State/Local Workforce Investment Boards are Provided**

**State/Local WDB Support**

This activity supports the changing workforce system focus described in Section A of this plan. It also supports the state's economic development plan and the Governor's charge to the CWI to:

- Promote the use of economic and labor market information to ensure evidence-based policy recommendations to guide the state's broad workforce development system;
- Recommend policies to strategically target state training and education resources;
- Foster and support public-private partnerships and intergovernmental cooperation and coordination in the building of Wisconsin's workforce; and
- Develop and implement initiatives that invest in Wisconsin's workforce and establish measures to monitor progress towards achieving objectives.

- **Maintain and Enhance Electronic State Workforce Information Delivery Systems**

WORKnet and video streaming fit into the goals of the WIA five-year plan by providing a seamless interface of services that will be accessed by employers, members of the workforce, and their families. Because of the organizational structure of DWD, multiple entities within DWD provide information and support to the One-Stop delivery system. Video streaming will integrate the information produced throughout the DWD and will deliver it with one façade to customers, increasing both the accessibility and usability of the information.

- **Support State Workforce Information Training Activities**

**Accessible Workstation/Maintenance & Training**

This is an ongoing project that provides people with disabilities the opportunity to link to core services of the One-Stop delivery system, including labor market information. A basic tenet of WIA is universal access; ensuring electronic labor market information is available to people with disabilities is key to universal access. This project will train local staff on the use of the technology that

meets the needs required under WIA section 188.

**IX. B. 4. Information Products and Tools**

Electronic delivery serves as the cornerstone of the state workforce information delivery system. DWD maintains responsibility for statewide electronic system development and interfacing between systems. Enhancements reflect customer feedback, the availability of new information sources and ongoing development of other market information systems. Recent information requests reflect interest in collecting, developing, and analyzing information on new and emerging workforce opportunities and the associated skills required. National electronic workforce tools such as WID and the Occupational Careers Videos are critical to this success.

DWD's interactive web query application, WORKnet, serves as the front end piece for the WID. WORKnet dispenses timely and accurate labor market information to support *Grow Wisconsin*. The future direction of WORKnet will continue to focus on substate-level skills data, on emerging industries, and on industry cluster profiles. The WID will be enhanced to include a broader array of economic and workforce indicators so that customers have access to up-to-date, sub-state data from multiple information sources.

Both individual and business customers can easily access Career Voyages, America's Career Information Network and the rest of the Career One-Stop from the wisconsinjobcenter.org web page. Customers are encouraged to use these tools to supplement those developed by DWD. DWD is committed to the development and continuous improvement of reporting/information brokering systems not only to keep pace with federal requirements but, equally important, to provide customers, direct services staff and managers with state-of-the-art tools.

**IX. C. Adults and Dislocated Workers**

**IX. C. 1. Core Services**

**IX. C. 1. a. Universal Access**

A guiding principle of Wisconsin's One-Stop delivery system is to ensure adults and DW have universal access to core services. This includes, at a minimum, all of the services identified in WIA section 134(d)(A) – (K). They are offered in an integrated manner and not by program funding. They are also accessible by either self-service or limited staff assistance. Through self-service, they can be accessed directly at the Job Center, JobCenterofWisconsin.com, or through the Job Center's website. Resources include a listing of weekly workshops, job fairs, publications, information on nontraditional occupations, Job Matching, and community resources (medical, childcare, food, housing, etc.).

Wisconsin's Job Centers will establish yearly assessment strategies to improve upcoming programming and services. Assessment strategies will focus on the following areas: attendance/enrollment outcomes in WIA programs, effectiveness and demand for core/auxiliary programming/services, trends in local labor market and occupational information, and local demographic information.

One-Stops must make a conscious effort to enhance universal access to services for individuals with disabilities and minority individuals through targeted outreach efforts with community/civic organizations and partners, the school system, various media resources, local businesses, and other public forums. One-Stop facilities must develop strategies and resources for offering any/all interested individuals the opportunity to learn about and become more acquainted with existing resources, programs, and services as well as availability of auxiliary aids and formats. This includes assistance with operating computers and work stations, and accessing printed information.

**IX. C. 1. b. Three-tiered Service Delivery for Labor Exchange Services**

DWD continues to be responsible for planning, administering, and making available high quality self-service, facilitated self-help, and staff-assisted public labor exchange program services to all job-seekers and businesses in Wisconsin.

The critical feature of Wisconsin's public labor exchange operations is high volume, information brokering services available to all One-Stop customers. It helps job seekers plan strategically and provides career guidance to both the high skilled workforce and those with more limited skills. Businesses are able to connect with effective matches – whether they be educated and prepared job seekers or those looking for entry level positions.

In Wisconsin, all Job Service staff are fully integrated into One-Stop facilities that manage and provide core services to job seekers, and recruitment services, including job order servicing, to businesses. This field structure is connected to and supported by some exciting new technologies recently developed in Wisconsin, including the JCW and our statewide call center operation. This allows Job Service operated public labor exchange information-brokering services to be readily and easily accessible to businesses and job seekers wherever they can access the Internet.

**Self Service**

In Job Centers, self-service occurs for job seekers who visit the Resource Room and choose to use electronic tools, primarily our new electronic labor exchange system, the JCW, as well as available hard copy materials without consulting staff. Here, jobseekers can begin the process of talent and skill development, including: exploring careers, learning about trainings, and reviewing job opportunities. JCW also allows a growing number of citizens to access the system at anytime, from anywhere, and to not only search for jobs but also post their resume. JCW also provides the business community with the ability to directly enter job postings for recruitment, and offers the new feature of resume search. JCW continues to grow and develop and include more features and services for customers.

### **Facilitated Self Help**

**For Job Seekers:** Resource Rooms are the setting for facilitated self-help in Wisconsin's Job Centers. Job Service is the lead agency and primary provider of Resource Room services. When requested, or observed, Resource Room staff offer:

- Planning-related systems (especially including JCW) and hard copy materials;
- Assistance when requested or when staff observes a need; and
- Customer service representatives in the Resource Room who are computer literate; have comprehensive knowledge of the local labor market; understand career planning; are proficient in successful job search strategies and recognize potential eligibility for other One-Stop system services; direct job seekers' attention to jobs for which they may be qualified and make referrals as appropriate based on their knowledge of the labor market in general and specific listings that reflect current recruitment activities; and share their expertise with customers and, in return, customers keep staff knowledgeable about who is looking for work and how best to present job opportunities.

Job Service is currently working on numerous enhancements to the resource room experience, including a much stronger focus on staff-assisted assessment. In addition to the resource room, Job Service now offers a statewide call center for jobseeker assistance. This allows jobseekers who need additional assistance with services or the new JCW to call a toll free number and access the assistance they need.

**For Business:** Job Service functions as a provider of high volume recruitment services to the business community. Job Service Wagner-Peyser funded staff service job orders that are displayed on the JCW. However, this service is not provided entirely via a statewide call center, which has improved service consistency and efficiency. Without a large and diverse selection of current job openings, the value of Job Centers would lessen. In addition to job order processing and business assistance with the new JCW, Wagner-Peyser staff who provide business services may:

- Lead and assist with the development of job fairs;
- Provide businesses with recruitment services, as well as related staff and partner training; and
- Offer facilitated self-help, in relation to job postings (orders), which is the assistance that Job Service staff provides to businesses that list their own orders on a direct entry system.

### **Staff-Assisted Service**

**For Job Seekers.** Declining Wagner-Peyser funding continues to impact the availability of staff-assisted services beyond the Resource Room. Because of that, Job Service embarked upon an effort to consolidate its staff into 22 Job Center locations in 2008. Those changes have allowed Job Service to strengthen resource room

services, operate the call center, and focus more attention on staff-assisted services, such as:

- Reemployment Services to Unemployment Insurance (UI) Claimants, in collaboration with local partners;
- A variety of job search and career planning workshops for the general public; and
- Employment counseling and testing, both of which are highly valued by the customer community, and important to addressing vocational choice, change, and adjustment faced by DW, youth and older workers. This service is of great value to businesses for recruitment, and as a direct service to their establishments in matters of workforce retention, particularly during this time of labor shortages.

**For Business.** Service to employers continues to demand strong attention. Job Service works closely with its partners to increase coordination, streamline service delivery and increase flexibility. By improving its public facing systems, Job Service staff will be able to better assist with the labor exchange services of: recruitment planning; information brokering; screening and referral; quality job order writing, and talent development and retention strategies. Job Service continues to work with partners to secure the business of employers, facilitate jobseeker employment, and achieve the “bottom line” goals of Job Center-based programs operated by Job Service.

**IX. C. 1. c Integrated Resources**

DWD requires each WDA to develop an area-wide plan and strategy that outlines how partner agencies will use resources to meet the individual, business, and economic growth needs of the area by employing a system-based, regional approach.

Within Job Centers, resource integration is managed through One Stop Operators and tools such as MOUs, Operating Agreements and Facilities Plans. Job Service continues to wear multiple hats, and ensures that all Wagner-Peyser activities are fully integrated into the WIA planning process, local decision-making, and Job Center service delivery.

**IX. C. 2 Intensive Services**

As referenced in II. and VI.B., more emphasis will be put on assessment and career advising, and the use of state-wide skill assessment tools such as WorkKeys, CASAS or NOCTI that are currently being used by some WDBs. Increased career planning as part of the person's individual employment plan will also likely occur as the RISE activities are infused at the local workforce system level.

DWD issued a policy that further defines "short-term prevocational activities" to prepare individuals for employment or training including:

- Development of basic learning, communication, and interviewing skills such as punctuality, personal maintenance and professional conduct skills; and
- Development of occupational literacy skills to complete a training program or class. This includes basic computer classes.

As an additional response to employers' continued concerns about the level of "job readiness" of prospective employees, WDBs have increased efforts to provide "soft skills" support under intensive services.

**IX. C. 3. Training Services**

**IX. C. 3. a. Governor's Vision for Increasing Training Access and Opportunities**

Public and private leaders across the state are engaging in new initiatives to bridge the gap between leading industries and their future workforce. Recognizing the importance of this work, and seeking to strategically extend it as a state strategy, Wisconsin's Sector Strategy initiative is a critical step. This will be the basis for a responsive training system that will address the needs of both employers and the workforce inter-dependently. Complementing the CWI's recommendations, the Governor's vision includes:

- One-Stop system alignment of training initiatives and ITAs to sector strategies and demand occupations;
- Development of more career pathways and "bridge" programs to support the skills advancement of working adults;
- Establishment of pilots on the appropriate tools to increase the awareness and interest in demand occupation employment opportunities available in the region and the pathways to achieving employment;
- Increased emphasis on offender reentry training and job obtainment to ensure that every available worker is tapped for the jobs of the future;
- Increased focus on accelerated training and occupational skills training;
- Coordination with non-WIA funded training programs operated through other state agencies with a focus on high-skilled demand occupations; and
- WDBs will be required to spend 35% of Adult, Dislocated Worker and Special Response funds on training in accordance with DWD guidance.

**IX. C. 3. b. Individual Training Accounts**

**IX. C. 3. b. i. Policy Direction**

As referenced in the Vision sections, the state is moving toward industry sector-driven, accelerated training models with increased emphasis on a career pathways approach. Also, in response to the economic climate, the state will be focusing training on middle-skilled jobs.

DET policy direction for ITAs delivers on the WIA principle of customer choice. It encourages case managers in the One-Stop delivery system to make participants the center of the decision making process when selecting a training program and provider that best meets their needs. To

support this, the ETP List and its format has been revised to improve the accessibility of the information therein to WIA training seekers, their case managers, and to the training provider. For the latter group, DET's intent is to reduce barriers to the eligibility process. The central objective is to create and maintain the most comprehensive ETP List possible that offers ITA training voucher holders a broad variety of quality training choices.

### **IX. C. 3. b. ii. Innovative Training Strategies**

In addition to broadening the scope of training and ITAs, the *Next Steps* focuses on building partnerships with business, education, economic development and industry associations. In addition to the previously discussed strategies, other key efforts include the:

#### **Career Pathways**

Through the RISE project, there are a number of approaches being taken for building industry-driven career pathway models to ensure that low skilled adults have the opportunities to increase their skills and wages. With this joint initiative of DWD and WTCS, Wisconsin was awarded a \$1,000,000 Joyce Foundation grant that focuses on system changes and innovative collaboration. Efforts are underway to incorporate the Career Pathway model into the workforce system so that lower skilled adults can access appropriate training to meet employers' needs and attain family-sustaining wages. Career Pathways is competency-based training that can be more responsive to employee workforce skill training needs and emerging economic development efforts. Critical to the success of RISE is a business community that is engaged at both the state and regional levels to address the skill needs of major industry sectors for a consistent and improved talent pipeline.

Skills Jump Start is a component of the RISE grant for course development and hiring of instructors to help students bridge the gap between Adult Basic Education and skills attainment. It will also assist working adults who need assistance in mastering basic skills in order to advance in their careers or obtain additional job training.

The state's planned outcomes for RISE are:

- Higher number of low-income working adults enrolled in post-secondary education;
- Higher proportion of lower-skill adult learners transition into and complete associate degrees, technical diplomas, and/or certificates;

- Higher proportion of low-income working adults attain degrees, technical diplomas, and/or certificates; and,
- Increases in earnings and job quality.

The state's outcomes for new Pathways to the middle class are:

- Entry-level jobs that connect workers to future opportunities;
- Reliable and easy-to-understand ways to build skills and earn better pay;
- Lifelong learning in doable increments; and
- Sectors offering jobs with career potential.

Another focused strategy is to implement the waiver that will allow the use of up to 10% of the local formula funds to provide **incumbent worker training** efforts enumerated in the statewide allowable activities. The purpose is to expand the flexibility of the WDBs to address the skill upgrade needs of employed workers to meet the requisite skills for current employers and anticipated emerging industries. Expanded local service delivery options could include establishing an employer loan program to assist in skills upgrading, increasing the number of individuals training for non-traditional employment, targeting areas in immediate response to economic conditions, and developing exemplary program activities. The Governor's *Next Steps* includes priorities for "worker training," "advancing industry-led training initiatives" and "emerging industry skills partnerships," all of which support innovative incumbent worker training activities. [Note that VIII.D. includes regional training strategies in the local plans.]

There are a number of demonstrated successful strategies that will continue, including:

#### **College Boot Camp for Training Workers**

At the Gateway Technical College in Racine, Wisconsin, a boot camp prepares workers to be machine tool/computerized numerical control operators. The intense training includes classroom work and hands-on lab five days a week at 40 hours a week for 14 weeks. This effort is partnership between Gateway, the Racine County Workforce Development Center and the Kenosha County Job Center. By aligning and integrating the education and training supply chain across workforce development, technical colleges, and employers, this effort helps ensure Wisconsin companies remain competitive in the global economy and workers have access to high-wage, high-demand jobs with career pathways.

**High Tech Manufacturing**

The WIA funded EISP was launched in 2007 to build partnerships between business, industry associations, WDBs and technical colleges to train current and future workers for the high-tech job market. Priority emerging fields were identified in biotechnology, advanced manufacturing, stem cell research and renewable energy. The goals for the EISP projects include:

- Addressing the current and future skill needs in the above-targeted fields;
- Developing industry/sub-industry, supplier and labor partnerships to promote industry innovation/development, identification of required industry skills and cooperative solutions to addressing skill needs that will support growth and sustainability in these industries;
- Developing institutional partnerships for development of effective response capacity; and,
- Developing occupational career pathways for low skilled adults, DW and the current workforce.

Finally, the Manufacturing Apprenticeship Pilot will link graduating youth apprentices in manufacturing to employers in the adult apprenticeship program that have a need for trained, skilled workers. Youth apprentices participating in the pilot will also receive credit toward the adult apprenticeship manufacturing program from their high school apprenticeship experience.

**IX. C. 3. b. iii. Commitment to Fund High-Growth, High Demand Occupations**

As discussed in V., the state has in place grounded strategies that support high-growth, high demand occupations.

**IX. C. 3. b. iv. Limiting ITAs**

There is no state policy that limits the duration or dollar amount of ITAs. The WDBs have local policies related to parameters of ITAs and are required to keep the state informed of their training policies, including limits to time and/or dollar amounts for ITAs.

**IX. C. 3. b.v. Apprenticeship**

As part of the efforts described in VI. E., case managers will make referrals by identifying eligible candidates who meet the minimum criteria for entrance into local Apprenticeship programs, in accordance with the application structure established by the program's apprenticeship committee or sponsor. WIA Title I funds for core, intensive, and training services will be utilized that

best compliment the registered Apprenticeship program and maximize the service delivery for the potential job seeker and Adult Apprenticeship employer. Adult Apprenticeship staff conduct routine visits to the education and employer sites for monitoring and technical assistance purposes. For PY 09, BWT will also review partnership and coordination efforts targeting Registered Apprenticeship as part of the WIA LPL on-site monitoring to promote a seamless dual program model. In addition, Adult Apprenticeship staff are working with BWT to implement Training and Employment Guidance Letter (TEGL) 02-07 regarding increasing apprenticeship program applications for the ITA system.

**IX. C.3. b. vi. Religious Activities**

WIA Section 188(a)(3) continues to be a guide for using state WIA dollars to fund religious activities. In 2002, the state issued a policy affirming faith based organizations' right to be training providers. It emphasized access to Wisconsin's State List of Eligible Program and Providers when they meet all other state requirements. IX.H provides additional information.

**IX. C. 3. c. Eligible Training Provider List for Broader Customer Access**

The ETP List is available on the Internet at the following address: <http://www.wisconsinjobcenter.org/ita/>. It is accessible through any Wisconsin Job Center or to individual training seeker with Internet access. Case managers and other service provider staff have access to ETP Lists program and provider data through the ASSET Data Collection system. The purpose of the interconnectivity of these databases is to assist case managers when compiling required training program and provider details at the time of update to a customer record.

**IX. C. 3. d. On-the-Job Training and Customized Training**

**IX. C. 3. d. i. Governor's Vision for Increased Opportunities**

The Governor is committed to increasing specialized training using the successful models from the Wisconsin Regional Training Partnership (WRTP). WRTP has demonstrated effective training methods in multiple industry sectors in tandem with labor unions. Their Center of Excellence for skilled trades and industries is another nationally-recognized model for other areas to replicate.

DWD is committed to a pro-active system that matches needed skill-sets with employer's needs which was the impetus for the CWI-WIA funded Incumbent Worker Training Grant program. This was developed in 2001 to provide incentives to employers to institute or continue programs to address the skill/education requirements of the existing workforce and workplace restructuring efforts.

The lessons from this initiative will be-examined for a renewed focus on specialized training in order to address these priorities:

- Significantly upgrade employee skills;
- Create lay-off avoidance strategies; and
- Rapidly meet labor shortages.

**IX. C. 3. d ii. Operational and Funding Issues**

The state uses the WIA and accompanying regulations as its policy, and WDBs are encouraged to use these training activities when appropriate. DWD has used various approaches to funding these activities with shared support from the state, the WDB and the employer. Discussions have begun about ways in which to dovetail and expand these training approaches with the Adult Apprenticeship programs.

**IX. C. 4. Service to Specific Populations**

**IX. C. 4. a. Strategies to Meet Needs**

To ensure that all individuals have access to the full range of workforce development services DWD established the following job seeker oriented Job Center service standards. Job seekers have access to services that will meet their needs, including:

- Information on education, employment and training services available;
- A listing of local service providers and whether the services are available on-site or elsewhere in the local area;
- Initial eligibility information on programs available in the community for which they are eligible;
- Information on nontraditional occupations, which is made available to customers as part of their overall orientation;
- Information on pre- and post-support services needed to maintain the employment situation;
- Assessment;
- Career guidance and occupational information;
- Current job openings, the qualifications associated with these openings, and application instructions;
- Assistance with job search, including resume writing, interviewing, seeking nontraditional employment positions, using labor market information and locating the "hidden job market"; and
- Information on the UI filing and claims update processes.

**IX. C. 4. b. Reemployment Services**

A principal aim of the Wisconsin Worker Profiling Services System (WWPS) is to provide Reemployment Services to claimants who are likely to exhaust their benefits and unlikely to return to their previous jobs or occupations. These claimants are given additional assistance to facilitate an early return to employment.

Due to the ending of federal funds for WWPS as of PY 05, state resources are now primarily responsible for funding this program. As a result, Job Service has eliminated administrative costs and continues to offer streamlined program policies and procedures by standardizing the program orientation and developing common system-wide program materials. Wisconsin's Re-Employment Services program operates in a strongly coordinated effort with Wisconsin UI. The combined efforts of the Re-Employment Services program and UI have had remarkable success which is reflected year after year in the savings of the UI trust fund. Re-Employment Services continue to be provided at a lower level than desired given the scarce availability of funds. Wisconsin has an established service delivery structure that would allow it to expand services, and save further UI trust fund resources, rapidly should resources come available.

**IX. C. 4. c. Unemployment Insurance Work Test**

Wisconsin requires all UI claimants to engage in an active work search, and each must contact at least two employers per week for each week of benefits claimed, unless specifically granted a "work search waiver." The work test covers a claimant's ability to work, availability to work, and the suitability of work offered.

Providing the work test continues to be a Job Service role and a One-Stop system priority. Work test services are provided via claimant registration on JCW, availability of Job Center resource room resources, worker profiling/reemployment services and workshops, and information about Job Center services available to all claimants. Feedback requirements, on information that may potentially adversely affect a claimant's eligibility for benefits, are promptly reported electronically to UI Adjudication Staff. This important function of the public labor exchange system ensures that WIA-intensive service resources are made available for rapid claimant transition to the state's workforce.

**IX. C. 4. d. Integration and Alignment of Dislocated Worker**

Wisconsin has taken numerous steps, and conducts numerous activities to foster integration of Trade Adjustment Act (TAA) and WIA DW Services. Wisconsin's strategy for planning and implementing integration involves organizational, training and technology components.

Organizational components include:

- Policy development and implementation for WIA Title I DW programs and the TAA program are housed in the DW Unit of the Local Services Section of DET. The DW Unit developed and maintains the *TAA Policy and Procedures Manual*.
- The DW Unit is responsible for conducting Rapid Response (RR) activity. State RR staff are trained to assess the need for filing a TAA petition. At each initial RR event, RR staff ask employers and workers if they believe the layoffs were the result of foreign competition. They carry a supply of petitions to each RR meeting.
- All local Job Centers have information and access to information on

filing TAA petitions and TAA services in their resource rooms. Most Job Centers have someone on-site trained on how to file TAA petitions.

- Local Job Service managers are required to develop written coordination agreements with each WDB. The contents of the agreements are specified in the state's TAA manual.

Other activities include:

- More than 80 Job Service staff, 40 AFL-CIO Labor, Education and Training Center staff and approximately 10 UI Division staff throughout the state have received training from the DW Section on how to file TAA petitions. WDB staff are also trained on the program.
- TAA and WIA DW services and outcomes are tracked in a single, integrated reporting system. That system is known as ASSET;
- The ASSET system allows TAA and WIA staff serving common clients to share assessment, reemployment plan, case management and outcome information on common clients;
- Web Intelligence data warehouse. This data base tool allows state and local program managers to use corporate and customized reports to monitor and evaluate the level of co-enrollment and service provisions on both programs; and
- Performance measurement tracking is done using the WIA performance standards for both WIA and TAA programs. This gives the DW Section the ability to measure performance outcomes in both programs using a common methodology.

Wisconsin used the \$250,000 in IT improvement fund for TAA for:

- **Trade Act Participant Report (TAPR) Improvements** – Data is drawn from multiple systems, including participant, financial and UI benefits systems, to produce the quarterly TAPR. Work was completed to correct or improve the reporting of several TAPR data elements.
- **Automate the TAA Financial Plan** – The TAA financial plan can now be completed in the ASSET participant reporting system. Once it is filled in the report can be printed so that the participant can sign it and retain a copy for their records.
- **Case Management Activity Reports** – A new case load report was developed for the ASSET data warehouse. This report identifies caseloads by workforce area, case manager and participant activities. It can be used to identify high and low workload areas and to make adjustments to caseloads between staff.
- **Simplified TAA Activity Reporting** – TAA reporting in ASSET was based on the WIA system which categorized services as core, intensive and training services and required TAA case managers to search through lengthy lists of services for allowable TAA services. A service menu specific to the TAA program was developed in ASSET which simplifies data entry.

**IX. C. 4. e. Collaboration to Overcome Barriers**

The sections throughout the plan that outline the anticipated outcomes of the NGA work, and implementation of the CWI recommendations, will result in activities that strongly invest in specialized populations being trained in demand occupations for increasing the pipeline talent. The Navigators have played a pivotal role within the One-Stop system to ensure the necessary collaboration for appropriate service delivery and job placement success. Also referred to earlier, the RISE policy scan project, being jointly conducted by DWD and WTCS, will further identify barriers that the state will overcome in order to provide a broader spectrum of persons into the labor pool.

**IX. C. 4. f. Full Array of Services to Individuals with Disabilities**

The basic structures for serving job seekers with disabilities are addressed through the One-Stop delivery system and through the partnership planning structures. The Disability Program Navigators have been helping the Job Centers meet the challenge. Specifically, the Navigators are advocating at working/planning groups at the state and local level that affect people with disabilities. Navigators help determine and address staff training needs, and assist with employer education and outreach. The Navigator's role as important tools for services to the disabled transcends the walls of the Job Centers. They are a community resource.

DWD will continue to provide the tools and strategies to strive towards universal access to core services under WIA. The Navigators will continue to be integral to addressing areas of need, such as language barriers, physical disability, geographic location, cognitive barriers, low reading levels and being economically disadvantaged. The state will encourage monitoring by local boards to ensure special need groups are receiving adequate services.

DWD will continue to support the Accessible Workstation project to provide universal access to the Job Center core services. The 28 workstations deployed feature ergonomic furniture, screen reading, zoom text, voice recognition and other hardware solutions.

The Navigators provide employer education that includes technology fairs, Mental Health Toolkit, Medicaid Purchase plan, and disability specific resources. They also market bonding and tax credits that encourage employers to hire targeted groups.

A major collaborative effort to ensure the array of services for persons with disabilities who have been part of the long-term care system was the formation of a Managed Care and Employment Task Force in May 2007. The 28 members represented state-wide geography and a wide range of experts including the BWT Director and DVR staff. The Task Force was "charged with recommending a comprehensive strategy to expand work options for adults who rely on the community-based, long-term care system." DHS has recently released the Managed Care and Employment Task Force Final Report that involves an extensive range of related

training and employment recommendations along with collaboration proposals. The recommendations (with detailed sub-sets not listed below) related specifically to workforce issues are as follows:

- "DHS should adopt a clear policy on employment for the managed long-term care system to guide all system partners in a common effort to achieve common goals.
- In support of full implementation of the policy on employment by the managed long-term care system, DHS should offer strong support, technical assistance, and financial incentives to Managed Care Organizations (MCOs) in order to increase employment outcomes for managed care members, and should ensure that certification of MCOs takes into account MCO capacity to support integrated employment outcomes.
- In order to blend all resources available for individuals wishing to pursue employment, DHS and MCOs should strengthen coordination with system partners, including the school system, vocational rehabilitation system, and the workforce One-Stop system.
- In order to ensure all MCO members have a range of employment choices equal to those available to citizens without disabilities, targeted efforts should be undertaken to increase the pool of Wisconsin employers hiring qualified applicants with disabilities to fill existing or customized positions.
- As individuals consider the possibilities around employment, benefit specialists should be available to provide accurate, timely and easy-to-understand information on the interaction of benefits eligibility and employment, including work incentives that allow individuals to work while maintaining eligibility for Social Security, Medicaid, and long-term care services.
- In order to ensure all MCO members have a range of employment choices equal to those available to citizens without disabilities and are able to pursue their individualized employment goals, service providers should be helped to expand and improve their capacity to develop and support high quality integrated employment outcomes."

The full report is located at:

<http://dhs.wisconsin.gov/wipathways/PolicyDocs/MCETF%20Final%20Report.pdf>

As background, Wisconsin was among 11 states to be awarded this federally-funded grant to improve systems and resources in order to maximize integrated and competitive employment for persons with disabilities while protecting and enhancing workers' healthcare and other benefits including job supports. Currently, there are 42 initiatives to address these strategic priorities:

- Support principles of universal design;
- Create well prepared and qualified employees through the education system from pre-kindergarten to post-secondary education;
- Create a system of unprecedented collaboration among all service providers, with a person-centered focus;

- Increase access to long-term care and other employee benefits for people with disabilities;
- Create an effective and practical technical assistance program for employers who intentionally and successfully employ and accommodate people with disabilities; and,
- Develop a comprehensive communication plan for public and employer awareness.

The DWD and DHS Secretaries have made a commitment to collaborate on implementation strategies of the Task Force recommendations. DET and DVR are drafting responses for systemic and programmatic changes in order to improve services for this population. The CWI Medicaid Subcommittee, referenced in III.B.1., is serving as the advisory body to this vital effort.

**IX. C. 4. g. Veteran's Services Staff Role in the One-Stop Delivery System**

See VI.B. for organizational alignment of veterans services.

The major role of the Disabled Veterans' Outreach Program (DVOP) within the Job Center system is to provide intensive service delivery, through case management, to veterans with employment barriers, with special emphasis on targeted groups such as minorities, females, economically disadvantaged, disabled, homeless, and incarcerated individuals. The major role of the Local Veterans' Employer Representative (LVER) within the One-Stop delivery system is to provide business services to employers that will result in increased job opportunities for veterans through the job development process.

Both programs are measured by entered employment and *job retention* performance standards with the total veteran population and the disabled veteran population as the universe. Individual performance standards for LVERs and DVOPs include case management and staff-assisted placement of all veterans and disabled veterans, as well as job retention standards. In addition, individual performance standards for DVOPs include staff-assisted entered employment and retention for all veterans and disabled veterans. Individual performance standards for LVERs include staff assisted entered employment and retention for all veterans especially recently separated veterans.

The Job for Veterans Act [Public Law 107-288 issued November 7, 2002] which amended 38 U.S.C. Chapter 41 and 20 CFR 1001.120 states that all veterans must be provided "veteran's priority" for all DOL operated programs. Therefore, all WDBs have a local policy to serve veterans first for WIA services.

**IX. C. 4. h. Limited English Proficiency (LEP)**

Attachment M details the 2008 LEP Plan. LEP individuals are provided with access to Job Center services and all DOL federal financial assistance programs at no cost to the participant. Job Centers and WDBs are monitored for appropriate signage. Oral interpretation services are provided through a combination of bilingual staff, telephone

interpreter services and a current vendor list for the translation of vital documents as required by *Executive Order* 13166 and the relevant DOL Policy Guidance including TEGL No. 26-02.

**IX. C. 4. i. Activities Planned For Providing Services to Agricultural Employers and Migrant and Seasonal Farm Workers (MSFW)**

Wisconsin has in place a network of outreach workers based in the Job Centers statewide. There are six bilingual individuals providing services to both employers and workers. However, each of these individuals has this responsibility as only a portion of their work. When viewed in aggregate across the state, these portions of six positions total less than 1.5 of a full time equivalency.

As bi-lingual staff vacancies occur, local offices are faced with providing bi-lingual services without that staff member present. Job Service has obtained a listing of authorized interpreters for a number of languages, and distributes this listing to all Job Centers statewide.

Wisconsin's current service delivery to both employers and MSFW consists of in-person contact, in-person follow-up, mailings of information and telephone and email communication.

Given the large distances to some of the remote camps and the length of the season during which workers arrive (March through November), the "how to" best serve the MSFW population remains an issue. Wisconsin continues to develop strategies to address issues of limited staffing and how best to utilize the resources available. The current program design includes:

- Wagner-Peyser funded outreach staff travel statewide to migrant camps and provide employment and resource information in person and via mailings and e-mails to workers and their employers.
  - 1.) Staff plan the outreach visits close to the arrival of workers at the beginning of each season. The season starts in March (nursery stock) and continues through November (holiday wreaths and trees).
  - 2.) The timing of the outreach visits is pre-arranged with the employer to best fit the employers' and workers' schedules. In-person visits at work, living sites and gathering areas are made throughout the season.
  - 3.) Outreach is done in coordination and collaboration with other agencies serving the MSFW population. This collaboration includes, but it is not limited to: a) outreach workers who have previously served the area, b) camp inspectors, and c) United Migrant Opportunity Services (UMOS), and d) WTCS staff. This sharing of resources have provided beneficial information-sharing such as maps to locations, times to visit, brochures of resource materials, resource directories and a collaborated presentations that are provided to workers and employers.
  - 4.) Group presentations have been the most efficient delivery method with upwards of 100+ workers at some of these sessions.

Pre and post-season meetings with outreach workers, the State Monitor Advocate and Job Service Management, are an important component of the MSFW program. These meetings allow all staff involved with implementing the program to prepare for the upcoming season, share promising practices, coordinate coverage and develop strategies to deal with difficult issues. At season close, the same group discusses how the pre-season developed strategies have worked, what to work on during the winter period when there is less MSFW activity in preparation for the next season.

The content of the most recent meeting included:

- 1.) An introductory business card with toll-free phone number and local numbers of statewide and nationwide MSFW services.
- 2.) A map clearly defining areas of service and contact information for the MSFW staff responsible for each area.
- 3.) Resource directory brochure for workers. This tool is on-line and can be customized for each area of service in the state. Currently it is being customized by county of service. The resource contains essential information about resources available to MSFW in the area, toll-free numbers and web resources.
- 4.) Agriculture Employer Guide. This is a brief brochure with information on worker retention, labor market information and business assistance available to the agriculture employers. It also includes resource information for employer, web resources and contact information.

Training opportunities are provided for staff. For example, in the fall of 2008, staff were trained on reporting information in the computerized ASSET system. In 2009 the following trainings are anticipated:

- 1.) Continue with specific training on ASSET
- 2.) Continue laptop training and on-line services training.
- 3.) Comprehensive review and refresher training on providing services, complaint system and networking.

The newly launched JCW will allow MSFW to view job openings, and other pertinent job information before they travel to the state. Technologies such as e-mail, Internet, and other computer strategies will be utilized to meet the needs of a widely dispersed and mobile population of employers and workers.

#### **IX. C. 5. Priority of Service**

##### **IX. C. 5. a. Procedures and Criteria**

All WDBs have local priority of service policies in place related to public assistance and other low income individuals based on the state policy that was revised in response to the Veteran's priority of service mandate. In addition, DET also provides information to the WDBs through the WIA Local Plan Guidelines and approval process.

##### **IX. C. 5. b. Provision of Priority of Service to Veterans**

Wisconsin issued *State Veteran Program Letter* 01-05 on April 13, 2005, that outlines the Veteran first-served requirements for all DOL programs.

This resulted in WDBs revising their local policies. *Veteran Program Policy Letter 01-07* was issued March 19, 2007, for implementation of the Veteran's Priority Performance Goals for all DOL funded programs. Shortly, the DET Office of Veterans Services will be issuing a Veteran Program Policy Letter that will implement the Final Rule issued in Federal Register 78132. In the meantime, all WIA services are using the first-served veterans requirement, and as stated in IX.C.4.g., all WDBs have a local policy.

#### **IX. D. Rapid Response (1- 7)**

##### **IX. D. 1. Rapid Response**

The DW Unit within BWT/DET is the organizational unit responsible for conducting RR activities. The unit has two full time RR Coordinators. Other staff in the section are trained to provide backup to the RR Coordinators as needed.

Activities are coordinated with WDBs and local elected officials through designated staff contacts in each WDA. In events that have more than 50 people affected, the state RR staff are responsible for making initial contact, scheduling the initial meeting with the company and where appropriate, local unions. Local WDB staff are included in initial meetings so that they can present local information on services and how to access them.

A variety of sources are used to identify events. These include, but are not limited, contact with the following sources:

- AFL-CIO Labor Education and Training Center state level and field staff;
- Electronic and print media;
- WARN and State Plant Closing/Mass layoff notices;
- State and local Economic Development Agencies;
- Outplacement consulting firms;
- WDB staff and providers;
- UI Profiling and Reemployment services staff;
- Elected legislative officials;
- State and local level business associations; and
- Local Job Center contacts.

During the initial visit with employers, RR Coordinators emphasize the benefits of early intervention. The goal of every initial visit is to walk away having set up the dates and times for worker orientations. The RR Coordinators explain to the company the benefits of conducting the worker orientations early, on-site and on company time.

RR services are informational. Worker orientations are conducted by state and local service provider staff. Local service provider staff are the primary presenters on services available in their area. They present the information to the workers thereby establishing a local contact at the worker orientation. At the orientations, workers are surveyed to determine the interest and need for specific workshops, training and other activities. Trade Act petitions are filed at the initial meeting or shortly thereafter. TAA benefits are not covered in the initial orientation meeting with the workers. Should a company become TAA certified, a separate TAA/Trade Readjustment Assistance session is conducted for the workers.

State RR staff meet with state economic development staff from Commerce to discuss mutual contacts and services. They exchange data with business development staff on each plant-closing event. On occasions where Commerce is working with a client and it is determined that DW services are needed, Commerce staff refer the client to the DW Unit. Information gathered by the DW Unit through workforce surveys is shared with Commerce staff in an effort to identify the skills of a particular workforce that may be of interest to a new business considering placing a facility in an area where a plant closing or layoff has recently occurred.

RR staff are aware of the services provided by Commerce and local economic development agencies. When conducting an initial RR meeting, state staff always ask the company if they have been in contact with the Commerce to see if something can be done to save the business. If not, and the company is interested, staff refer the company to the Local Economic Development Manager. Representatives of the state Manufacturers and Commerce Association and Commerce sit on the DW Subcommittee of the CWI. These agencies promote RR as a business-friendly activity.

The state RR Coordinators work with outplacement consulting firms to leverage private resources whenever they are involved in any event. Services are planned to be complementary and non-duplicative. The DW Unit coordinates with other agencies including Employee Benefits Security Administration, Veterans' service agencies and the Social Security Administration.

The state uses an Access database to track plant closing notice activity and Trade Act Petition Data. Since RR services are informational, participants are not tracked. All WIA, including NEG, TAA and Job Center services are tracked in the ASSET information system. The link provides information for WARN/dislocations: <http://worknet.wisconsin.gov/worknet/downloads.aspx?menuselection=da&pgm=pcml>

Approximately 80% of the RR funds available are used to provide additional assistance to local areas experiencing increased unemployment because of dislocation events that require funds beyond the formula amount.

## IX. E. Youth

### IX. E. 1. Strategies, Requirements and Coordination

#### **Strategies for providing comprehensive, integrated services to WIA youth.**

Governor Doyle is committed to quality programs for youth through the KidsFirst, *Next Steps* and other initiatives. For the WIA-related elements, DET's Local Plan Guidelines require extensive information on WDB's youth strategies and how they will integrate those services with multiple partners.

#### **Overall Strategies**

Over-arching strategies to meet the vision outlined in I.E. include:

- Provision of additional technical assistance and training to WDBs and youth service providers which would include training on assessment, case management systems, and improving performance;
- Implementation of the Wisconsin Covenant Foundation for financial assistance toward post-secondary certifications and degrees;

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- Coordination with other state agencies including DOC/Division of Juvenile Corrections, DCFS, DPI, and the WTCS regarding the provision of comprehensive youth services;
- Analyses of gaps for improvements as part of the youth goal levels for the common measure negotiations;
- Improvement of linkages to the job market, employers, non-profit and faith-based organizations, social service agencies, and youth service providers; and
- Focus on meeting the demands of business, especially high-growth/high demand industries and occupations.

### **Service Strategies**

- Drafting a new state policy on waiving the competitive procurement process for youth providers if there is justification on a case-by-case basis in rural areas and ensuring an on-going oversight of the WDBs that have a state approved waiver;
- Implementing the Manufacturing Apprenticeship Pilot for improved transition into adult apprenticeship;
- Expanding Youth Apprenticeship opportunities for students in Milwaukee Public Schools as part of a consortium providing outreach to employers to expand worksites, student recruitment, related instruction coordination, mentor training, and stakeholder informational meetings;
- Working with WDBs to ensure that the education and skills training needed by youth to attain education/employment credentials, participate in post-secondary education, or become gainfully employed in a career with advancement opportunities is available to them;
- Piloting the development of a work readiness certificate that includes assisting employers in finding and developing the entry level workforce needed to meet their hiring needs;
- Expanding technical assistance and training in labor market information, career portfolios, health and safety in the workplace, post-secondary options, and motivation in the workplace;
- Strengthening the connections with DPI, WTCS, and UW to increase public awareness of the importance of education;
- Expanding pilots such as Career 101 or other such mechanisms to connect schools with WDBs, linking them to employers with demand occupations and job openings as identified by career clusters;
- Helping youth to understand that securing employment opportunities and increasing one's career potential is directly related to completing education and/or skills training; and attainment of education/employment credentials;
- Providing career development training, which includes labor market information for K-12 school teachers and local WIA youth staff and youth service providers;
- Providing technical assistance and training related to helping youth find gainful employment (full-time or part-time), and the necessary support services needed to help them obtain or maintain employment, such as childcare, transportation, assistance with uniforms or other work attire, eye glasses, linkages to community services and assistance with housing;
- Summer job shadowing;
- Manufacturing academies for high school juniors and seniors; and
- Financial literacy training and credit counseling.

### **Out-of-School Youth**

Serving out-of-school youth is one of the most crucial issues facing Wisconsin. Out-of-school youth have problems connecting to the labor market. The major challenge in serving this population is not in identifying them, but recruiting, retaining and keeping them engaged in the program. Most out-of-school youth programs are not designed to meet the needs of older youth. These programs do not offer age-appropriate or other activities that interest youth. DET and WDBs will focus on strategies to provide for necessary employment as well as addressing need for basic skills, occupational skills, and work readiness skills.

Some WDBs have made significant changes in the design of their local youth program and policies to better address the needs of out-of-school youth. For example, Milwaukee is increasing the percentage of WIA youth program funding for out-of-school youth from 30% to 40%. In the Green Bay area, the in-school youth program was scaled down and now less than 30% of WIA funds are used for in-school youth. The bulk of the WIA youth allocation is directed to out-of-school youth.

### **Strategies to Recruit Out-of-School Youth**

- Marketing youth-focused outreach materials;
- Developing youth-based informational websites; and
- Presentation by Job Center Staff to youth and their families in traditional and non-traditional places, such as convenience stores, laundromats, and youth centers.

### **Strategies to Target Services to Out-of-School Youth**

- Focusing on strategies to retain those out-of-school youth engaged in required education/skills training activities;
- Improving accessibility to Job Centers services for out-of-school youth through
  - Consideration of establishing convenient and extended hours for youth;
  - Conducting out-of-school youth forums and focus groups;
  - Presentation by Job Center staff in places frequented by out-of-school youth; and
  - Providing separate youth oriented areas in the Job Centers to include information regarding youth services and youth-specific materials.

### **Strategies to Retain Out-of-School Youth**

- Recruiting employers to serve as guest speakers at events/activities, providing youth with information about their companies, their industry, expectations, and hiring practices; and
- BWT youth staff will provide TAT for WDB staff and youth service providers on how to better serve out-of-school youth.

### **Youth with Disabilities**

The Wisconsin Statewide Transition Initiative (WSTI) for youth with disabilities workgroup led by DPI, including a staff person from BWT, will work at the grass-roots level to ensure ongoing collaboration and communication regarding services to youth with disabilities as they move from school to the world of work, post-secondary education or back to the community.

WSTI partners include:

- DPI;
- Cooperative Educational Service Agencies (CESA);
- WI Family Assistance Center for Education, Training and Support;
- WTCS;
- UW Madison Center for Education and Work;
- DCF;
- DOC/Division of Juvenile Corrections;
- Wisconsin Statewide Parent-Education Organization; and
- Public school (K-12) representative.
- WI Regional Service Network;
- WI Statewide Parent Educator Initiative;
- WI Assistive Technology Initiative;
- DOC;
- University of Wisconsin System;
- National Alliance for Secondary Education and Transition;
- WI Family Assistance Center for Education, Training and Support;
- Waisman Center (UW-Madison);
- National Secondary Transition Technical Assistance Center;
- Individuals with Disabilities Education Act Partnership; and
- Independent Learning Centers.

#### **In and Out of Foster Care Youth**

Wisconsin's Shared Youth Vision team consists of individuals from the BWT, DPI, DCF, WTCS, Wisconsin Association of Family and Children's Agencies, and Lad Lake, Inc. The team is currently working on a youth resource mapping project. The purpose of the project is to identify federal, state, local agencies and organizations that provide programs, services or have resources to help disconnected youth. The resource guide will be distributed to the WDB youth leads who in turn will disseminate to their respective youth providers, Community Faith Based Organizations and other agencies service foster care youth.

#### **Juvenile Offenders**

The Shared Youth Vision team developed a model to help juvenile offenders transition back into the community, work place, secondary education or post secondary education. Ninety days prior to the juvenile offenders release their agent convenes a transition team to develop a plan for the youth before they are released.

#### **Court Involved Youth**

DET staff participates in an interagency work group created by the DOC focused on court involved youth. The work group includes members from DPI, DWD, DCF, and the WTCS. The purpose of the workgroup is to help provide information, resources, and training to enhance the education of youth while they are incarcerated and when they transition back to their community.

#### **Homeless Youth**

Ongoing communication and collaboration with partners that include the Wisconsin Association for Homeless and Runaway Services, DPI, DCF, Cooperative Educational Service Agencies and Public Schools will ensure youth service providers are aware of available programs and services at Job Centers and refer homeless youth to these

services. The Runaway Service agency is composed of 20 service providers outside of the "system" that addresses the needs of homeless youth. They provide training and connect youth with the WDB youth staff.

**Migrant and Seasonal Farm Worker Youth**

DET and WDB youth staff collaborate with local school districts, local head start programs, local non-profit organizations including faith-based entities and employers that provide services and programs to migrant and seasonal farm worker youth.

**Refugee Youth**

Currently the Bureau of Migrant, Refugee and Labor Services has an initiative called Road to Work. The purpose of Road to Work is to help refugee women and out of school youth (18 – 25 years) obtain English, skills training and jobs. DET collaborates with county and local agencies, voluntary agencies, and refugee services providers to assist in connecting to Job Centers that can provide various services to refugees.

**Enhancing Middle School and High School Education.**

PLTW is a pre-engineering program for middle schools and high schools, designed to interest students in careers in engineering and to begin preparing them to be successful in advanced engineering education. There are 120 High Schools and 34 Middle Schools participating in PLTW. DWD was an active partner in this program with WIA funding.

**IX. E. 2. Job Corps**

Wisconsin has one Job Corps named Blackwell Job Corps Center, which is located in Laona. They provide the following education and training at their center:

- High School Equivalency Diploma (HSED);
- Work- based learning opportunities available by trade;
- Personalized career development plan; and
- Hands-on training in a chosen trade area.

The participants can choose a trade in the following areas:

- Bricklaying;
- Carpentry;
- Business Technologies;
- Electrician;
- Facility Maintenance;
- Health Occupations;
- Painting; and
- Welding.

For example, Blackwell Job Corps staff refers Job Corps participants, after they graduate, to North Central WDA to see if they are eligible to participate in their WIA Youth Program. Many of the WDAs make referrals to Blackwell for those out-of-school youth that participate in their WIA youth program. Schools that have contact with their high school dropouts inform these youth about the Blackwell Job Corps Center where they could receive educational services that would enable them to receive a HSED or a General Education Diploma.

Another Job Corps Center is scheduled to open in Milwaukee in 2010. Coordination between Job Corps and other youth programs, particularly with MAWIB in the Milwaukee area, is proceeding.

**IX. E. 3. Reserve Funds for Statewide Activities to Serve Youth**

**IX. E. 3. a. Utilizing Funds to Promote Coordination**

As addressed in I.E., III.C.4., a number of the Governor's workforce initiatives involve cross-agency collaboration with anticipated common outcomes measures. Collaborative efforts with DPI, WTCS, DOC, and other entities for improved training and education for youth are being developed through the NGA process described in III.C.1. and III.C.4. as well as the regional industry-sector planning.

**IX. E. 3. b. Cross-cutting Models**

PLTW has been a partnership with schools, universities and technical colleges to prepare middle and high school students for good-paying jobs in engineering and science. This quality program focuses on STEM (Science, Technology, Engineering, Mathematics) education and careers and serves as the corner stone to ensure a competent and well-trained technical workforce to address the pipeline needs.

**IX. E. 3. c. New Models for Alternative Education**

Other examples of cross-cutting models and alternative education include:

- The **Dane County Transition School** is an innovative charter school that serves 60 at-risk students, 14 – 21 years of age. It is designed around specific program objectives that re-engage at-risk students into the learning process and help students realize that education is practical and functional to everyday living. BWT's youth program staff person has provided technical assistance and training on career development, case management, assessment tools, and labor market information.
- **Generac Power Systems, Inc. Youth Apprenticeship Program – A Second Chance** designs and manufactures top quality, long life power generation equipment. They are one of the leading companies in this dynamic business. Many years ago the Generac Company realized there was a shortage of young people choosing manufacturing as a career. They also knew that the traditional high school experience was not for everybody. As a result, they partnered with DWD, UW Whitewater, and several local school districts to integrate the Manufacturing Production Technician Youth Apprenticeship Program into their business. As a part of the year-round competency-based program, at-risk students work in various departments throughout the company, as well as on a variety of production lines. This “hands on” experience is combined with interactive classroom on-site time to help the students learn important concepts in engineering, math, science, English, and social studies as well as earn credits toward high school graduation.

The apprentices are paid an hourly wage, expected to report to work like other employees, and have their pay reduced for tardiness, unacceptable work, or any other similar infraction. A certified teacher works with the students in Generac's on-site Training Center and coordinates this twenty-month program with the local high school. With individual instruction and numerous mentors, participants make valuable connections to help them learn and succeed. Students who complete the program are awarded a state Youth Apprenticeship certificate and receive a high school diploma from their local high school. Generac has recruited a number of other businesses in southeast Wisconsin to replicate this program model, resulting in many more at-risk students completing high school and acquiring valuable job skills.

**IX. E. 3. d. Demand-Driven Models**

In addition to IX.E.1., DWD has initiated activities with the following models:

- Skill certification and certification of work readiness, assisting employers in finding and developing the entry level workforce needed to meet their hiring needs;
- MSSC program expanded into high school training in advanced manufacturing skill area; and
- "Academies" have taken career development and the boot-camp concept to new levels. DWD provided a grant to North Central Wisconsin WDB along with technical college partners for a manufacturing academy. High school juniors and seniors attended the four-day program free of charge that included (a) the design and fabrication of a product in a campus manufacturing lab, (b) tours of local manufacturing facilities, and (c) sessions on career exploration and financial information for continuing post-secondary education. Upon completion, the attendees earned one to two credits of technical college coursework.

**IX. E. 4. Program Design**

In addition to the Local Plan information, BWT uses the Monitoring Guide, VIII. H., to make sure the WDBs are meeting the WIA provisions regarding youth program design. The following information is collected from each local board:

1. Describe the outreach and recruitment process for in and out-of-school youth. Describe how it is determined who gets into the program and who does not. Describe the process used to refer youth that do not participate in the program.
2. Describe assessment tools used to evaluate academic levels and career goals.
3. Describe the services provided and identified in the ISS to assist youth who are basic skills deficient. Include who the providers are, the cost, how the youth's process is monitored, and how it is determined the youth has reached an acceptable level.
4. Does the local board specify a minimum basic skills test score which determines if the youth will/or will not become a participant in the WIA youth program? If the youth is at or below this score, where are they referred for services?
5. Describe youth strategies, services, and activities which make your youth program a year-round comprehensive program versus a summer work program only.

6. Describe how the local board will program the 10 program elements available to youth participants.
7. What is the impact of the youth program on the local economy?
8. What is the impact of the youth program on schools?
9. How are you coordinating the WIA Youth Program with other local youth programs and initiatives such as PLTW, Youth Apprenticeship, and Science, Technology, Engineering, and Mathematics fields.

**IX. F. Business Services**

**IX. F. 1. Determination of Employer Needs**

DET requires Business Service Teams as part of the Job Center Standards. These Business/Employer service teams operate at varying levels at each of the Job Centers. Workforce partners are part of the team to collaborate on job development and employer needs activities. Employer feedback has identified that there still exists too many people from the various programs contacting them, and too many silos created by each of the participating partners. Therefore, DET has these focused goals in the next year to improve employer services by the Business Service Teams:

- Each Team has a single employer point of contact;
- Team members will focus on regional/hub and shed its programmatic identity;
- Cross-train Team members to better guide them on what each partner has to offer, and relay that to their employer contact, including tax credits and other employer benefits;
- Clarify relationships between the Call Center Anywhere (job order taking system) and the Business Service Team; and
- Clarify relationships between the Team and the job seeker service delivery system so information is shared and distributed.

The WDBs provide a plethora of services to employers. As part of a best practices scan in 2008, the following are examples of the local area services beyond the traditional and on-going job fairs:

- Taking the lead in organizing industry-specific business clusters with regular "what do you need" meetings;
- Memberships in local area's Society of Human Resources Managers, Chambers of Commerce and economic development entities;
- Developing and presenting Manufacturing Awareness Project for employers that gives potential employees information about the manufacturing industry;
- Providing recruitment, pre-screening, interviewing, background and reference checks;
- Placement and retention assistance of DVR referred employees;
- Marketing and providing assessment and testing services including data entry, industrial skills, math and reading levels;
- Customizing training for fast-turn around specialized training;
- Integrating Business Service responsibilities into WDB sub-grantee agreements; and
- Hosting major events such as Employer of the Year Awards and Retooling the Talent Pool

DWD is developing an updated customer satisfaction survey that will be available electronically through the JCW. The new focus has been on skill needs, matching

requirements, and the expectations of both the physical Job Center system and the electronic tools used to connect jobseekers with employers (this was especially critical in the development of JCW).

Locally, there is ongoing cooperation between WDB staff and Job Service to both strengthen partnerships and improve business relations. This coordination is redefining how and where business services are provided, in addition to the continually shifting list of what services are needed.

**IX. F. 2. Integration of Business Services and Wagner-Peyser**

Wisconsin continues to make improvements in the One-Stop service delivery system. One of the biggest changes was the development of JCW and the statewide call center. JCW now allows resume posting and searches, which provides an entirely new level of service to employers and ensures their connection with Job Center customers – be they physical or virtual. The call center system has eliminated duplication and overlap from the job order process, with only trained, experienced Job Service staff serving as call center customer service agents and processing all JCW job orders statewide.

Through help screens and clear communication, we ensure that all businesses are referred back to local service providers (be they Job Service or other partners) for enhanced service provision above and beyond job order processing. As new partnerships with business and industry are formed, the workforce system will continue to devise additional development strategies that facilitate the adoption of common workforce, educational, and economic goals. By continuing efforts to identify the high-growth job areas within Wisconsin we will be responding effectively to the business and industry needs for a skilled workforce and will be successful in meeting the demands. This is especially critical given the state of the current economy and the needs of jobseekers.

**IX. F. 3. Streamlining Federal Tax Credit Programs**

The Work Opportunity Tax Credit Program (WOTC) benefits both employees and employers. Employer involvement and participation in the WOTC program involve staff working directly with businesses, job applicants, and employment consultants, then processing the submitted documents, and issuing conditional certifications for the employers to claim the applicable target group tax credit. (The target groups include TANF participants, Veterans, ex-felons, high-risk youth, DVR clients, food stamp, supplemental security income and long-term family assistance recipients.) The State's Development Zone Credit also targets DW and residents of a federally-designated enterprise community. In the summer of 2008, there were conversations with the CWI Executive Committee on ways to improve the efficacy of these programs. The following guidance came from those discussions, and DET is determining the feasibility for implementation:

- Continue separate, but similar federal and state tax credit programs;
- Expand the Development Zone Credit to cover all Wisconsin employers;
- Create an automatic Wisconsin Credit for each federal credit granted, and
- Develop a tax credit for employers who provide apprenticeship.

**IX. G. Innovative Service Delivery Strategies/Maximize Resources**

DWD has made a number of shifts in the past year as described in other parts of the plan in order to introduce and/or strengthen service delivery strategies, increase partners around the table, and leverage resources. In summary, those included:

- Creation of *JobCenterofWisconsin.com* to upgrade services for employers and job seekers;
- Revised Job Center Standards
- Re-stationing Job Service and Veterans staff in consolidated regional sites;
- Redirection of funds for more emphasis on assessment and career advising with the intention of implementing across programs common tools; and
- Formalizing regional strategic planning.

The result of the NGA work (III.C.1., V.D.) in the summer of 2009 is anticipated to include major systemic and strategic efforts. In addition, the implementation of a number of the waivers will also result in service delivery improvements. For example, the use of up to 10% of the formula funds for statewide allowable activities, including incumbent worker training, will shift service delivery strategies to focus on state goals including:

- Increased business sustainability by reducing the risk of laying off employees or business closure because workers have not kept current with new skills and technologies;
- Increased market penetration of WDB's local employer base and access to jobs that are vacated by incumbent workers advancing due to their increased skill levels;
- Increased participation in career pathways and life-long learning models;
- Meet industry needs by addressing current labor shortages; and,
- Increased shift to on-the-job and customized training, and other more employer-directed short-term training programs that will ensure appropriate skill-set attainment to match the employer's job needs.

**IX. H. Strategies for Faith-Based and Community Organizations (FBCO)**

**IX. H. 1. Describe the activities to:**

**IX. H. 1. a. Increase Opportunities for Participation**

The value of FBCOs as training providers serves to maximize consumer choice for training seekers using the state's ITA list. For example, there is a broad cross-section of approved private, faith-based post-secondary and health care institutions that offer programs. Among accredited institutions are Cardinal Stritch University, Carthage College, Concordia University, Edgewood College, Marian College, Marquette University, St. Mary's University, St. Norbert College, St. Scholastica University, St. Thomas University, Villanova University, and Viterbo University. These institutions are located within and outside of Wisconsin's borders.

Additionally, FBCOs offering training programs found on the state's ITA list include the Good Samaritan Society of St. Croix Valley, Goodwill Industries, Grace Lutheran Foundation, Interfaith Older Adult Programs, St. Joseph Hospital, St. Joseph Residence, St. Luke Medical Center, St. Michael's Hospital, and the St. Anne Training Center.

**IX. H. 1. b. Expand Access to Clients**

For the WIA Local Plans, DWD specifically requested the WDBs to "describe (a) those activities to be undertaken to increase the opportunities for participation of faith-based and community organizations as committed and active partners in the One-Stop delivery system, and (b) those activities to be undertaken to expand the access of faith-based and communication organizations' clients and customers to the services offered by the One-Stops in the WDA."

Examples at the local level within the WIA infrastructure include:

- Ensuring FBCOs are included in all competitive RFPs and as subcontractors for special grant initiatives;
- Referring a client to FBCOs when appropriate as part of their employment plan;
- Inviting FBCOs to provide itinerate services at the job centers;
- Creating out-stations at local faith centers to serve as computer resource areas;
- Participating on the local job center coordination teams;
- Coordinating services specifically for special needs populations and recent immigrant members of a community; and
- Sharing resources for joint public service announcements and extensive network referrals.

**IX. H. 2. Strengthen State Collaboration**

**IX. H. 3. Leveraging Resources**

Through the JCW marketing campaign across the state, efforts were made to increase FBCO's awareness of the one-stop system opportunities.

An example of strengthening collaboration and leveraging resources, the WDB of South Central Wisconsin connected with DOL's initiative, SHARE Network. This model utilizes faith-based and community-based organizations as access points for workforce development system services. As a result of their initial efforts, DOL has provided on-site training to further expand the understanding of the model, and begin to customize tools and trainings for implementation in that region.

**X. State Administration:**

**X. A. Technology Infrastructure and Management Information System**

DWD provides a wide variety of IT support to Wisconsin Job Centers:

- ASSET: an automated case management system for tracking a customer's services and outcomes;
- JobCenterofWisconsin.com: This website replaced the department's outdated JobNet and JobNet Business systems. Job seekers are able to search for job openings statewide, by county, city, or zip code. It allows employers to post job orders and search for workers using keyword searches. Job seekers can create and save multiple professional-quality resumes. Employers are able to contact job seekers via email generated by the system. The anonymity of the job seeker is maintained until they choose to identify themselves to a potential employer. The system tracks services to employers and job seekers.

- WORKnet: Enables individual customers to access labor market and occupational information, business access to information about the labor market and economy and researchers to access labor market information and historical data;
- wisconsinjobcenter.org: This website is a link to a wide variety of workforce development tools for individual and business customers as well as Job Center staff. This site will be incorporated into JCW;
- Data Warehouse: Provides participation and performance reports for Job Centers;
- Eligible Training Provider List: Allows individual customers and case managers to make informed choices about potential training providers;
- Accessible Workstations: These adaptive computer workstations enable persons with disabilities to access the applications listed above; and
- Dedicated data connectivity lines to comprehensive Job Centers.

**X. B. Reserve Funds for Statewide Activities**

In addition to the required WIA activities, as noted in V.G and VII.D., the state will emphasize formalizing regional cooperation among all local and state workforce-related partners. Per the CWI recommendations, another piece for this activity will be evaluating the impact of the regional industry partnership investments in order to ensure system efficiency. The challenge will be to formalize the identification of key regional and statewide industry sectors, facilitate meaningful employer engagement in the workforce system, and align education and training programs with employer needs to have skilled workers for businesses to prosper. The goals for the NGA Sector Strategy Initiative include better use of existing resources through the expanded alignment of workforce funds, and coordinated regional service delivery across all partners. Preliminary activities identified to meet those goals include:

- Identification of lead industries and key occupations within those industries, the skills and training required for an on-going talent pipeline;
- Identification and coordination of partnership infrastructures where they do not exist but are vital for economic development and workforce implementation needs;
- Agreement of common outcomes designed to meet employers needs; and
- Cross-agency cooperative agreements for collaboration and leveraging resources.

**X. C. Performance Management and Accountability**

**X. C. 1. Performance Accountability System**

ASSET is an internet-accessible participant reporting and data collection system that all case managers and WDBs use to report WIA Title 1 and partner services for both performance measure and WIA Standardized Record Data reporting. ASSET is the official data source for all performance and program management data. The state has directed considerable funds and resources in this system's development to ensure that performance measure calculations are consistent with current Federal reporting requirements as specified in US DOL TEGL 17-05 Common Measures Policy for the Employment and Training Administration's Performance Accountability System and Related Performance Issues.

Staff have developed a number of tools to assist state and local staff in monitoring performance throughout each program year. These tools include:

- Technical Assistance Guides for each group of performance measures for Adult, DW, Older and Younger Youth, and TAA have been developed to help local boards understand and navigate the performance measurement system. These guides explain how each measure works, how data must be reported in ASSET, how and

when supplemental employment data is brought into performance measures, and provide an example of how each measure is computed using a sample set of data.

- A "Performance Measure Map" details the performance measurement system as it relates to ASSET. Each of the 15 participant-related performance measures is broken down into its individual components. The guide describes which components are factors in the numerator and denominator, and describes exactly where in ASSET this data is drawn from.
- A WIA policy update system is used to communicate state interpretation of Federal policies where states are given discretion and flexibility. Any published policy that affects performance includes a section designed specifically to describe how data is to be entered to ensure that performance is reported properly.
- Performance measures are a regular component of our technical assistance and training activities throughout the year. In addition to specific performance measure training conferences held each summer, staff participate in roundtables and provide locally customized training upon request.

Local staff are provided with quarterly performance reports and data that help them to monitor and continuously improve their participant reporting and performance outcomes. In addition to locally customized reports that coincide with the U.S. DOL's quarterly performance reporting formats, DET staff compute program-year-to-date performance outcomes so that local boards can monitor their progress toward meeting their negotiated performance goals.

DET developed a "Performance Achievement Report" that is updated each year following submission of the WIA Annual Report. The report will eventually contain the most recent seven program years of performance outcome data broken down by WDA. The report shows performance outcomes by participant characteristics, targeted populations, and other views. Because the reports are produced based on program year (i.e., July 1 - June 30), instead of "performance measure year" dates (which vary according to the measure), the data provide local boards with another perspective on how program participants fare in their programs. These data are used by local boards to apply for grants and to develop programs designed to address and improve service delivery, program design and participant outcomes.

Despite continuing software development and publishing issues, the Data Validation effort that U.S. DOL launched six years ago has been a useful resource for helping Wisconsin to fine-tune its reporting processes and program policies.

All of these tools and training activities have contributed to the continuous improvement of our performance outcomes over the past several years. The volume of local inquiries about performance measures has declined significantly, because local staff have these resources available to them

For PY07-08 developed performance "prevention" strategies that emphasized quality data and efficient use of ASSET and case manager time and resources to further improve performance outcomes that are sensitive to data entry and reporting errors. This effort began with a Data Quality Summit held in late summer 2007. The conference featured representatives from the U.S. DOL National and Regional Offices and the Social Policy Research Associates. As Phase 2 of the effort, DET performance and program staff conducted onsite technical assistance at each workforce development area.

**X. C. 2. Targeted Groups**

Wisconsin tracks specific targeted applicant groups required by DOL as part of its annual report requirements. DET maintains an internet accessible data warehouse that is available to any state and local staff who have secured access to the site on which the warehouse resides. This warehouse is developed using Business Objects and Web Intelligence software applications. The warehouse has numerous reports that track targeted populations based on services received, participant characteristics, co-enrollment and caseload management. The reports are updated and refreshed on a weekly basis and allow staff to monitor program and participant activities for active as well as exited participants.

**X. C. 3. Additional Outcomes**

For PY 2010, Wisconsin is implementing Common Measures. No additional measures have been established.

**X. C. 4. Common Data System and Reporting Processes**

As stated above, ASSET is Wisconsin's common data collection system. Data is extracted from this system to prepare and submit all WIA quarterly and annual reports. In addition to ASSET, DWD has invested substantial effort and resources into the development of a Job Center Systems Data Warehouse that contains data and reports requested by local boards and other state staff. The warehouse is Internet-accessible and requires security clearance to access the data contained within it. Performance staff also prepare reports and data sets for local boards' use and provide extensive performance measure analysis of the results for each quarterly and annual report.

**X. C. 5. CWI and Continuous Improvement**

Annually, the CWI and Governor produce an Annual Report that outlines performance attainment for each workforce investment area and the state as a whole. This information is used to develop strategies to adjust the workforce development system to meet the demands of the economy.

**X. C. 6. Evaluation and Sanctions**

Evaluation of performance is done through annual monitoring either through desk review or onsite. Typically, the DET provides technical assistance but continued poor performance may lead to sanctions.

The sanction process has two phases:

The first phase occurs when a WDB fails one or more performance measures in any given year. If this occurs, DWD will provide technical assistance. This includes helping the WDB to develop a performance improvement plan with the following components:

- Statement regarding which performance indicators will be improved through implementation of the plan;
- Analysis of performance problem, including a description of problem solving techniques used to determine the most likely causes of the problem and a description of the most likely causes;
- Identification of possible actions to improve performance, and descriptions of the actions the WDB will take to improve; and
- A timetable for implementing the selected solutions.

For phase two, if a WDB fails to meet the negotiated performance levels or customer satisfaction indicators for a program for two consecutive program years, DET must take corrective action. Corrective action may include the development of a reorganization plan, under which the Governor:

- Requires the appointment and certification of a new WDB;
- Prohibits the use of particular service providers or Job Center partners that have been identified as achieving poor levels of performance; or
- Requires other appropriate measures designed to improve local performance.

**X. C. 7. Proposed Performance Level for Each Measure**

The department received a waiver to implement Common Measures. Attachment N shows the PY 2010-2011 common performance State levels DET has negotiated with DOL. DWD will continue to collect data on the 15 WIA Title 1 performance measures for Adults, DW and Youth.

**X. D. Administrative Provisions**

**X. D. 1. Appeal Process**

For this purpose, DWD uses the appeal process identified earlier in VIII. A.3.

**X. D. 2. Non-Discrimination Compliance**

The state ensures compliance with the non-discrimination requirements as described in the equal opportunity MOA Recertification and VIII.H.

**XI. Assurances**

1. The state assures that it will establish, in accordance with section 184 of the WIA, fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the state through the allotments made under sections 127 and 132. (~1 12(b)(1 1)). The state is audited by the Wisconsin Legislative Audit Bureau.
2. The state assures that it will comply with section 184(a)(6), which requires the Governor to, every two years, certify to the Secretary, that -
  - a. the state has implemented the uniform administrative requirements referred to in section 184(a)(3);
  - b. the state has annually monitored local areas to ensure compliance with the uniform administrative requirements as required under section 184(a)(4); and
  - c. the state has taken appropriate action to secure compliance with section 184 (a)(3) pursuant to section 184(a)(5). (~ 184(a)(6).)
3. The state assures that the adult and youth funds received under the WIA will be distributed equitably throughout the state, and that no local areas will suffer significant shifts in funding from year to year during the period covered by this Plan. (~1 12(b)(12)(B).)
4. The state assures that veterans will be afforded employment and training activities authorized in section 134 of the WIA, and the activities authorized in chapters 41 and 42 of Title 38 US code. The state assures that it will comply with the veterans priority established in the *Jobs for Veterans Act*. (38 USC4215) and Employment and Training Administration Guidance Letter No. 5-03, dated September 16, 2003.
5. The state assures that the Governor shall, once every two years, certify one local board for each local area in the state. (~1 17(c)(2).)
6. The state assures that it will comply with the confidentiality requirements of section 136(f)(3).
7. The state assures that no funds received under the WIA will be used to assist, promote, or deter union organizing. (~ 181 (b)(7).)

## WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010

8. The state assures that it will comply with the nondiscrimination provisions of section 188, including an assurance that a MOA has been developed and implemented (~ 188.)
9. The state assures that it will collect and maintain data necessary to show compliance with the nondiscrimination provisions of section 188. (~185.)
10. The state assures that it will comply with the grant procedures prescribed by the Secretary (pursuant to the authority at *section 189(c)* of the Act) which are necessary to enter into grant agreements for the allocation and payment of funds under the Act. The procedures and agreements will be provided to the state by the ETA Office of Grants and Contract Management and will specify the required terms and conditions and assurances and certifications, including, but not limited to, the following:
  - General Administrative Requirements:
    - 29 CFR part 97 --Uniform Administrative Requirements for state and Local Governments (as amended by the Act)
    - 29 CFR part 96 (as amended by OMB Circular A-133) --Single Audit Act
    - OMB Circular A-87 --Cost Principles (as amended by the Act)
  - Assurances and Certifications:
    - SF 424 B --Assurances for Non-construction Programs
    - 29 CFR part 37 --Nondiscrimination and Equal Opportunity Assurance (and regulation) 29 CFR § 37.20
    - CFR part 93 --Certification Regarding Lobbying (and regulation)
    - 29 CFR part 98 --Drug Free Workplace and Debarment and Suspension
    - Certifications (and regulation)
  - Special Clauses/Provisions:

Other special assurances or provisions as may be required under Federal law or policy, including specific appropriations legislation, the WIA, or subsequent Executive or Congressional mandates.
11. The state certifies that the Wagner-Peyser Act Plan, which is part of this document, has been certified by the State Employment Security Administrator.
12. The state certifies that veterans' services provided with Wagner-Peyser Act funds will be in compliance with 38 U.S.C. Chapter 41 and 20 CFR part 1001.
13. The state certifies that Wagner-Peyser Act-funded labor exchange activities will be provided by merit-based public employees in accordance with DOL regulations.
14. The state assures that it will comply with the MSFW significant office requirements in accordance with 20 CFR part 653.
15. The state certifies it has developed this Plan in consultation with local elected officials, local workforce boards, the business community, labor organizations and other partners.
16. As a condition to the award of financial assistance from the DOL under Title I of WIA, the grant applicant assures that it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws:
  - Section 188 of the WIA of 1998, which prohibits discrimination against all individuals in the US on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the US or participation in any WIA Title I;
  - Financially assisted program or activity;
  - Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the bases of race, color and national origin;
  - Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
  - The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; andTitle IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs. The grant applicant also assures that it will comply with 29

## WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010

CFR part 37 and all other regulations implementing the laws listed above. This assurance applies to the grant applicant's operation of the WIA Title I-financially assisted program or activity, and to all agreements the grant applicant makes to carry out the WIA Title I-financially assisted program or activity.

The grant applicant understands that the US has the right to seek judicial enforcement of this assurance.

17. The state assures that funds will be spent in accordance with the WIA and the Wagner-Peyser Act and their regulations, written DOL Guidance implementing these laws, and all other applicable federal and state laws and regulations.

Acronyms

**ASSET** Automated System Support for Employment and Training

**BRG** Business Relations Group

**BWT** Bureau of Workforce Training

**CFR** Code of Federal Regulations

**CLEO** Chief Local Elected Official

**Commerce** – Department of Commerce

**CRC** Civil Rights Compliance

**CWI** Council on Workforce Investment

**DCF** Department of Children and Families

**DET** Division of Employment and Training

**DHS** Department of Health Services

**DOC** Department of Corrections

**DOL** Department of Labor

**DPI** Department of Public Instruction

**DVR** Division of Vocational Rehabilitation

**DWD** Department of Workforce Development

**DW** Dislocated Worker

**ETA** US Employment and Training Administration

**ETP List** List of Eligible Training Programs and Providers

**FBCO** Faith-based and Community Organizations

**GROW** Growing Regional Opportunities in Wisconsin

**HSED** High School Equivalency Diploma

**IT** Information Technology

**ITA** Individual Training Accounts

**IVR** Interactive Voice Response

**JCW** Job Center of Wisconsin

**LEP** Limited English Proficiency

**LMI** Labor Market Information

**LPL** Local Program Liaison

**LVER** Local Veterans' Employer Representative

**MAWIB** Milwaukee Area Workforce Investment Board

**MCO** Managed Care Organization

**WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

**MOA Methods of Administration**

**MOU Memorandum of Understanding**

**MSFW Migrant and Seasonal Farm Workers**

**MSSC Manufacturing Skills Standards Certification**

**NEG National Emergency Grant**

**NGA National Governor's Association**

**OEA Office of Economic Analysis**

**OSO One-Stop Operator**

**PLTW Project Lead the Way**

**PY Program Year**

**RFP Request for Proposal**

**RISE Regional Industry Skills Education**

**RR Rapid Response**

**TAA Trade Adjustment Assistance**

**TANF Temporary Assistance for Needy Families**

**TAT Technical Assistance and Training**

**TEGL Training and Employment Guidance Letter**

**UI Unemployment Insurance**

**UMOS United Migrant Opportunity Services**

**US United States**

**IVR Voice Response**

**W-2 Wisconsin Works (Wisconsin's TANF Program)**

**WAJTE Wisconsin Association of Job Training Executives (WDB Directors)**

**WDA Workforce Development Area**

**WDB Workforce Development Board (local)**

**WIA Workforce Investment Act**

**WID Workforce Information Database**

**WIRED Workforce Innovations in Regional Economic Development**

**WOTC Work Opportunity Tax Credit Program**

**WRTP Wisconsin Regional Training Partnership**

**WSTI Wisconsin Statewide Transition Initiative**

**WTCS Wisconsin Technical College System**

**WWPS Wisconsin Worker Profiling System**

## **Attachments**

Attachment A	ETA Regional Administrator
Attachment B	Program Administration Designees and Plan Signature
Attachment C	Cabinet/State Agency Organization chart
Attachment D	Governor's Council on Workforce Investment Act Members
Attachment E	<i>GROW</i> Map
Attachment F	State Waivers
Attachment G	DET Organization Chart
Attachment H	Comprehensive Job Center Map
Attachment I	Grievance Procedure
Attachment J	WDA Map
Attachment K	Monitoring Guides
Attachment L	Comprehensive Job Center Standards
Attachment M	Limited English Proficiency Agreement
Attachment N	Negotiated Common Measure Performance Goals for PY 2010-11
Attachment O	Public Review and Comment
Attachment P	Allocation Guide
Attachment Q	State Plan Addendum - American Recovery and Reinvestment Act

**Attachment A**

**ETA Regional Administrator**

REGION 5 - CHICAGO/KANSAS CITY

Byron Zuidema

Regional Administrator

U.S. Department of Labor/ETA

230 S. Dearborn Street, Rm. 628

Chicago, Illinois 60604

(312) 596-5400

FAX: 312-596-5401

[Zuidema.byron@dol.gov](mailto:Zuidema.byron@dol.gov)

Attachment B

Program Administration Designees and Plan Signature

**Name of WIA Title I Grant Recipient Agency:** Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

**Name of WIA Title I Signatory Official:** Roberta Gassman, Secretary, Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail Address: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

**Name of WIA Title I Liaison:** Ron Danowski, Division Administrator, Division of Employment and Training  
Address: 201 East Washington Avenue, G108, Madison, WI 53702  
Telephone Number: 608-266-3485  
Facsimile Number: 608-261-8506  
E-mail Address: [ron.danowski@dwd.state.wi.us](mailto:ron.danowski@dwd.state.wi.us)

**Name of Wagner-Peyser Act Grant Recipient/State Employment Security Agency:**  
Roberta Gassman, Secretary, Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail Address: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

**Name and title of State Employment Security Administrator (Signatory Official):**  
Roberta Gassman, Secretary, Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail Address: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

As the Governor, I certify that for the State of Wisconsin, the agencies and officials designated above have been duly designated to represent the State/Commonwealth in the capacities indicated for the Workforce Investment Act, Title I, and Wagner-Peyser Act grant programs. Subsequent changes in the designation of officials will be provided to the U.S. Department of Labor as such changes occur.

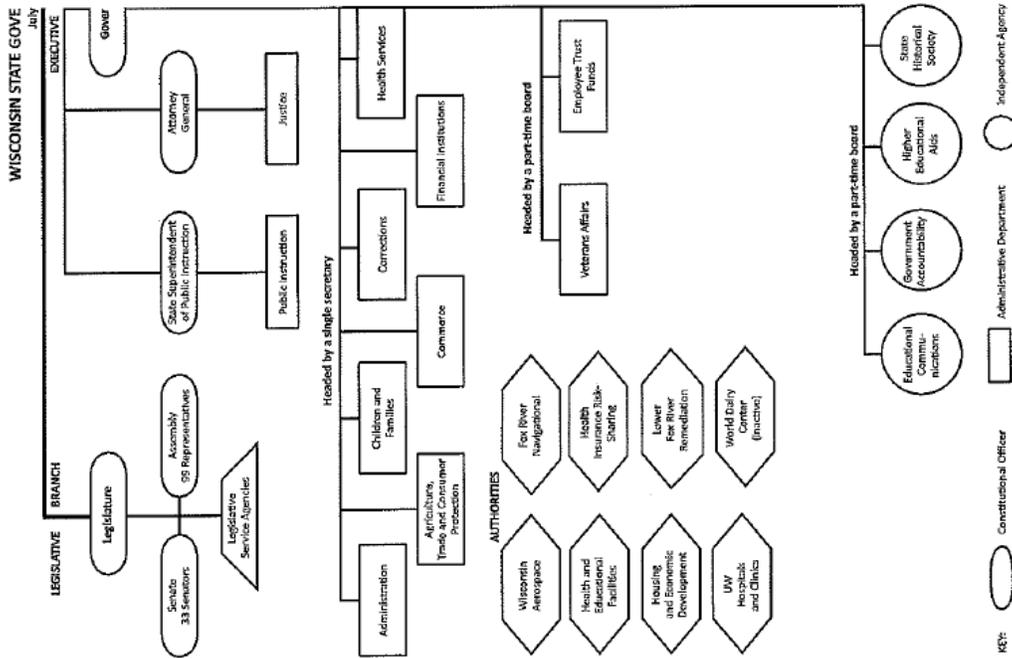
I further certify that we will operate our Workforce Investment Act and Wagner-Peyser Act programs in accordance with this Plan and the assurances herein.

Typed Name of Governor \_\_\_\_\_

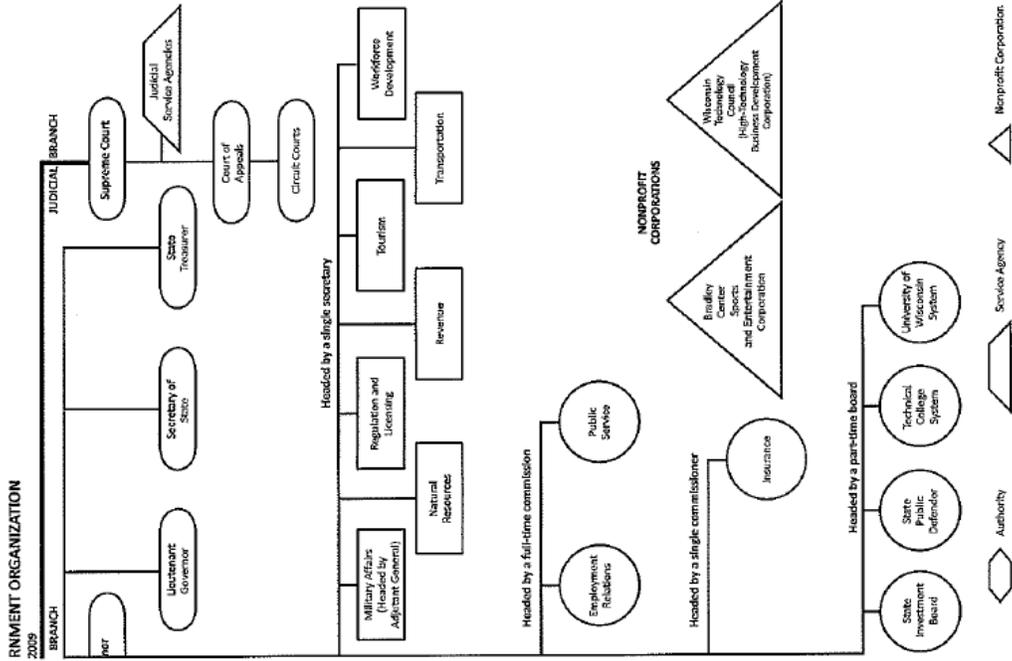
Signature of Governor \_\_\_\_\_ Date \_\_\_\_\_

Cabinet/State Agency Organization Chart

10 WISCONSIN BLUE BOOK, 2009 – 2010



11 FRAMEWORK OF WISCONSIN GOVERNMENT



Units of state government not shown on the chart are listed on following page.

## **Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010**

### **Attachment D**

#### **Members of the Governor's Council on Workforce Investment**

Tim Sullivan, CEO, Bucyrus International, Inc.: South Milwaukee

Joel Rogers, Director Center on Wisconsin Strategy: Madison

Daniel D. Andrist, Sales Consultant, Dorsch Ford KIA: Green Bay

Lyle A. Balistreri, President Milwaukee Building and Construction Trades Council: Milwaukee

Colleen Bates, Eau Claire County Supervisor: Eau Claire

Reggie Bicha, Secretary Department of Children and Families

Robert Borremans, Executive Director SW WI Workforce Development Board: Edgerton

Thomas Brien, Employee, General Motors: Janesville

Sharon Canter, Milwaukee Women, inc: Milwaukee

Elizabeth "Libby" Burmaster, State Superintendent of Public Instruction

Thomas L. Burse, President Buveck Consultants LLC: Milwaukee

William Chaudoir, Executive Director Door County Economic Development Corp: Sturgeon Bay

Daniel Clancy, President Wisconsin Technical College System

Senator Spencer Coggs (D), Wisconsin State Senate, 6th District

Jewel Currie, Director of Field Support, WE Energies: Milwaukee

Kathleen Drengher, Director Human Resources North America, Greenheck Fan Corporation: Schofield

Richard Leinenkugel, Secretary Department of Commerce

Barb Fleisner, Executive Director, Centergy, Inc.: Wausau

Rick Raemisch, Secretary Department of Corrections

Roberta Gassman, Secretary Department of Workforce Development

Jim Haney, President, Wisconsin Manufacturers and Commerce: Madison

Susan E. Hatch, President, Hatch Staffing Services: Milwaukee

John Heyer, President and Owner, Kettle Moraine Coatings, Inc.: Jackson

James P. Hill, Executive Director, La Crosse Area Development Corporation: La Crosse

## **Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010**

Ellen Holt, Director of Employee Relations and Recruitment, Gundersen Lutheran: LaCrosse

Tina Koehn, Vice President of Administration, UMOS Inc.: Milwaukee

Gayle Kugler, Director, WI Small Business Development Centers, Wisconsin Entrepreneurs' Network: Madison

Senator Joseph Leibham (R), Wisconsin State Senate, 9th District

Don Madelung, President, Herzing College: Madison

Debra Malewicki, UW-Extension: Madison

Phil Neuenfeldt, Secretary-Treasurer, Wisconsin State AFL-CIO: Milwaukee

Kent Olson, President/Owner, Olson Tire & Auto Service, Inc.: Wausau

Dr. Lee Rasch, President, Western Technical College: La Crosse

Mark Reihl, Executive Director, Wisconsin State Council of Carpenters: Madison

Donald L. Rouse, WOW WDB Member: Menomonee Falls

Christopher A. Ruud, Executive Vice President, Ruud Lighting: Racine

Henry Sanders, Jr., Capacity-360, MAGNET: Madison

John A. Scocos, Secretary, Department of Veterans Affairs

Julia Taylor, President, Greater Milwaukee Committee: Milwaukee

Karen Timberlake, Secretary, Department of Health Services

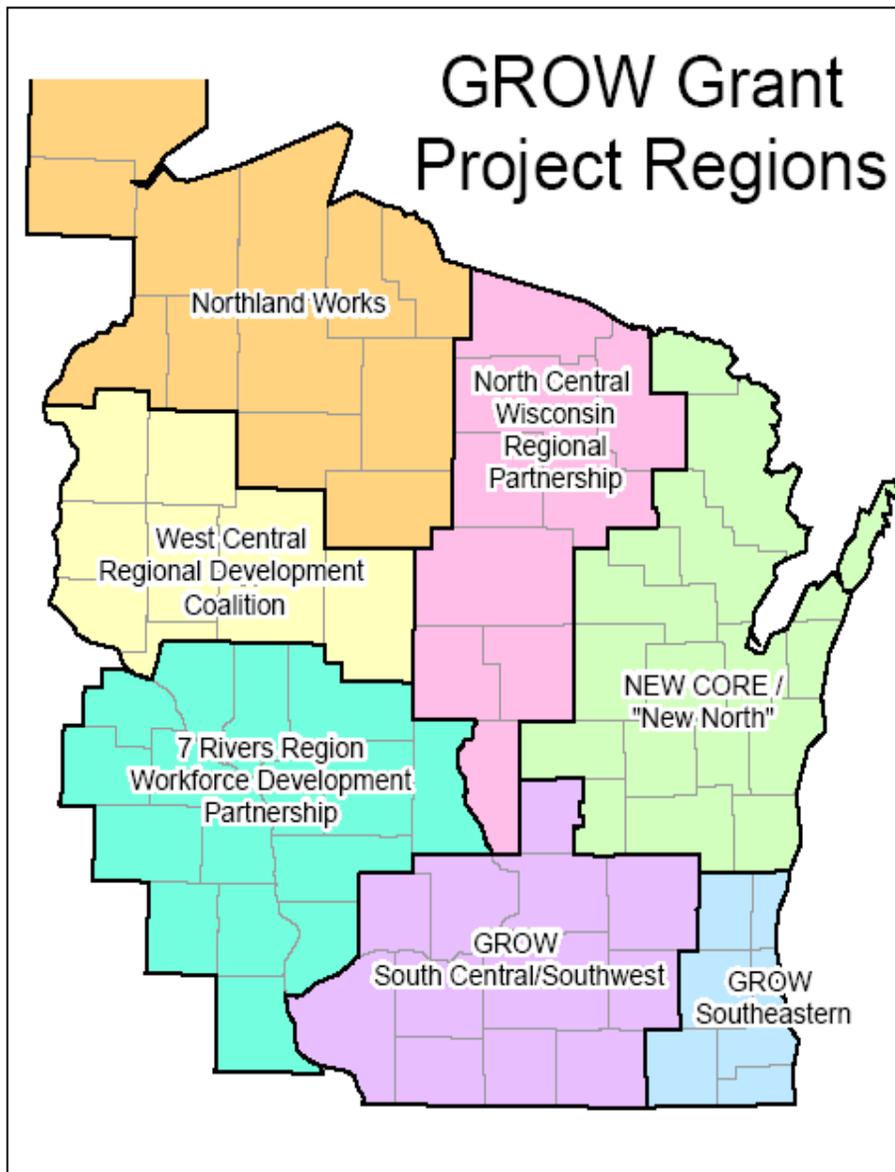
Dean Welch, Vice President of Operations, IT Convergence, Madison

Joan Wilk, Professor Emeritus, College of Nursing: Milwaukee

Representative Josh Zepnick (D), Wisconsin State Assembly, 9<sup>th</sup> District

Attachment E

GROW Map



Wisconsin Department of Workforce Development, Bureau of Workforce Information, April 2006  
File: S:\DWS\BWI\ArcGIS\Heather\GROW.mxd

## Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010

### Attachment F

DOL issued a response to the State's waiver plans on November 13, 2009, that included approvals, disapprovals and explicit implementation guidance. Based on that issuance, the waivers approved for program year 2009-2010 with conditions are:

- Common performance measures, WIA Section 136(b)
- Extending the period of initial eligibility of training providers, 20 CFR § 663.530
- Transfer authority up to 50% between the Adult and Dislocated Worker funding streams allocated to a local area, WIA Section 133(b)(4)
- The use of up to 10% of local Adult funds and up to 10% of local Dislocated Worker funds for incumbent worker training only as part of a lay-off aversion strategy for low-income adults, along with other conditions such as training restricted to skill attainment activities, WIA Section 134
- Partial waiver of the competitive procurement process for youth providers only for specific elements along with other prescriptive guidance, WIA Section 123
- Ability to increase the employer reimbursement for on-the-job training with a specified sliding scale based on company size along with other prescriptive guidance, WIA Section 101(31)(B)
- Ability to reduce the 50% employer match for customized training with a specified sliding scale based on company size along with other prescriptive guidance, WIA Section 101(8)(C)

The DOL letter of August 13, 2009, approved with conditions for the following waiver:

- Youth performance measures for out-of-school youth ages 18-24 who are in work experiences outside the summer months through March 31, 2010, served with the ARRA funds, WIA Sections 136(b);129(c)(2)(I);129(c)(1)(A);129(c)(1)(B)

The State has been able to respond to the Workforce Development Board's waiver requests since the November 13, 2009, issuance, and forwarded letters with implementation instructions to the local areas. In order to reflect DOL's conditions and training service program changes, a revised state waiver policy, and new state policies for on-the-job training and customized training were issued.

# Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010

## Issued Revised State Policy for Waiver Implementation May 10, 2010

*To:* WDB Directors  
Job Service Managers

*From:* Ron Danowski, Administrator  
Division of Employment and Training

*Subject:* **State Policy Update 10-08 on Workforce Investment Act Title I Waivers**

### **Introduction**

The Division of Employment and Training (DET) had previously issued two waiver policies based on U.S. Department of Labor (DOL) waiver issuances. This updated policy is based on DOL's November 13, 2009 issuance on the State's waiver requests for program year 2009-10. It makes clear the statewide waiver implementation of five of the approved waivers, and lists the three waivers that still require WDB waiver plans for DET approval due to the prescriptive nature of DOL's waiver/conditional approvals. The waiver plan elements and process steps remain the same as in the previous policies. With full implementation of waivers for this program year, the State will be required to address DOL's performance outcome's questions in the Workforce Investment Act (WIA) Annual Report. Therefore, explicit performance and reporting expectations have been added to this policy.

### **Purposes**

- I. Provides the November 13, 2009 U.S. Department of Labor's responses to the State's WIA Title I Waiver Plans  
[http://dwd.wisconsin.gov/dwdwia/PDF/state-plan-py2009%20\\_gov\\_letter111309.pdf](http://dwd.wisconsin.gov/dwdwia/PDF/state-plan-py2009%20_gov_letter111309.pdf)
- II. Identifies the State waiver approvals for statewide implementation and those that will require WDB waiver plans
- III. Rescinds policy updates 08-02 and 09-02
- IV. Reiterates the required waiver plan elements and processes from earlier policies, and adds further information on performance and reporting expectations

### **Background**

WIA provides continuing authority for DOL to grant waivers to states in implementing reforms in the workforce development system. The waiver authority also provides an important opportunity for the state and Workforce Development Boards (WDBs) to create a more nimble workforce infrastructure and expand innovative services to meet the needs of business and WIA participants.

### **Legislative/Regulatory References**

- WIA of 1998, 189(i)(4) PL 105-220
- 20 CFR § 661.400- 661.420
- November 13, 2009 U.S. Department of Labor Issuance

## Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010

### Waiver Update

DOL issued a response to the State's waiver plans on November 13, 2009, that included approvals, disapprovals and explicit implementation guidance.

Based on that issuance, these are the waivers approved for statewide implementation for program year 2009-2010 that will not require individual WDB waiver plans:

- Common performance measures, WIA Section 136(b)
- Extending the period of initial eligibility of training providers, 20 CFR § 663.530
- This is available for all WDBs if they want to have the ability to increase the employer reimbursement for on-the-job training with a specified sliding scale based on company size along with other prescriptive guidance, WIA Section 101(31)(B)
- This is available for all WDBs if they want to have the ability to reduce the 50% employer match for customized training with a specified sliding scale based on company size along with other prescriptive guidance, WIA Section 101(8)(C)

Based on the November 13, 2009, DOL letter, these are the waivers approved for program year 2009-2010 that will require individual WDB waiver plans and approval by DET prior to implementation:

- Transfer authority up to 50% between the Adult and Dislocated Worker funding streams allocated to a local area, WIA Section 133(b)(4)
- The use of up to 10% of local Adult funds and up to 10% of local Dislocated Worker funds for incumbent worker training only as part of a lay-off aversion strategy serving only low-income/economically disadvantaged adults, along with other conditions such as training restricted to skill attainment activities, WIA Section 134
- Partial waiver of the competitive procurement process for youth providers only for specific elements along with other prescriptive guidance, WIA Section 123

The DOL letter of August 13, 2009, approved with conditions for the following waiver that has been implemented statewide for program year 2009-2010, and does not require individual WDB waiver plans:

- Youth performance measures for out-of-school youth ages 18-24 who are in work experiences outside the summer months through March 31, 2010, served with the American Recovery and Reinvestment Act funds, WIA Sections 136(b);129(c)(2)(I);129(c)(1)(A);129(c)(1)(B)

### Summary of State Policy

In order to waive an allowable WIA provision, the State must submit a Waiver Plan as part of the required WIA State Plans to DOL for approval, disapproval or modification. WDB waiver plans may be submitted to the Department of Workforce Development - DET at any time. Once DOL responds to a State waiver issue, the State is then able to approve, disapprove, or modify a WDB's waiver plan. If the WDB is authorized to implement a waiver for a given program year, the WDB must submit the waiver plan request annually if the WDB wants to extend the waiver. If a WDB requests a waiver that DOL has not authorized the State to implement, then DET determines if such a waiver would be beneficial to improve service delivery and, if so, submits a Waiver Plan to DOL.

## Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010

The following outline details what is included in this policy:

- Required Waiver Plan elements on each WIA provision
- Process steps when the
  - a. WDB submits a Waiver Plan on an issue that the State has a DOL waiver approval, and
  - b. WDB submits a Waiver Plan on an issue that the State does not have a DOL waiver approval
- Performance and Reporting Expectations

### Required Waiver Plan Elements

Consistent with the intent to encourage local and regional responsiveness and innovative service delivery through waiver applications, the State has not added additional parameters to the DOL conditions for WDB waiver requests related to the DOL-approved issues. However, the State may apply conditions to WDB waivers as part of the DET approval process.

The following information must be substantively addressed in the waiver plan in a concise manner:

- Identify the statutory or regulatory requirements that are requested to be waived and the goals that the WDB(s) or state, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the strategic plan goals;
- Describe the actions that the local area(s) or state, as appropriate, has undertaken to remove state or local statutory or regulatory barriers;
- Describe the goals of the waiver and the expected programmatic outcomes if the waiver request is granted. Specify how the success and/or progress on outcomes will be measured or determined, including how the baseline will be/has been established and what data sources will be used;
- Describe the individuals affected by the waiver;
- Describe the process that will be used to monitor the progress in implementing such a waiver; and
- Describe the process the WDB(s) used to post public review and comment notices that ensure meaningful public comment. Include all comments received on the requested waiver(s), and modify the waiver plan as appropriate in response to the public input.

Where documentation (e.g., statistical information, reports, and focus groups) is available, reference it to correspond with statements made in the waiver plan.

### Process Steps Outlined Depending on the Waiver Issue Status

As noted in the Summary first paragraph on the previous page, the State must first acquire a waiver approval from DOL before DET can entertain individual WDB waiver requests. WDBs may request a waiver that either has been approved by DOL, or, that the State would need to attain DOL approval. The following outlines the process steps when the

- WDB submits a Waiver Plan on an issue that the State has a DOL waiver approval
- WDB submits a Waiver Plan on an issue that the State does not have a DOL waiver approval

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### WDB submits a Waiver Plan on an issue that the State has a DOL waiver approval

1. WDBs may submit waiver requests to DET at any time during the program year. WDBs are also provided an opportunity to request waivers via the local plan process. WDBs may explore waiver requests informally with DET prior to a formal submittal of a waiver plan. If a WDB intends to develop a waiver plan, they must notify DET and all other WDB Executive Directors of their intentions for purposes of possible statewide coordination and inclusion of other local areas in the plan.
2. WDBs will submit to DET their waiver plan request(s) with detailed explanations to meet the WIA required elements.
3. Describe the process the WDB(s) used to post public review and comment notices that ensure meaningful public comment. Include all comments received on the requested waiver(s), and modify the waiver plan as appropriate in response to the public input.
4. DET will review the waiver request, and respond to the WDB within 30 days with an approval, disapproval, modification, or pending status per DOL. The state may apply conditions to an approval, and, WDBs may need to modify their local plans.

### WDB submits a Waiver Plan on an issue that the State does not have a DOL waiver approval

1. WDBs may submit waiver requests to DET at any time during the program year. WDBs are also provided an opportunity to request waivers via the local plan process. WDBs may explore waiver requests informally with DET prior to a formal submittal of a waiver plan.
2. WDBs will submit to DET their waiver plan request(s) with detailed explanations to meet the WIA required elements.
3. Within 30 days after the review and comment period, DET will either:
  - a. submit the waiver plan from the Governor to DOL;
  - b. request WDB modification of the waiver plan; or
  - c. not transmit the waiver plan to DOL, and provide a letter of explanation to the WDB. DET may convey the issue of concern to DOL for future consideration.
4. Upon receipt of the state's waiver plan, DOL has 90 days for review and notification to the state on approval, disapproval or modification.
5. Modifications to the local or state plan(s) may be required if DOL approves the waiver plan request. DET will notify the WDB(s) of the DOL decision as well as any required modifications.

### **Performance and Reporting Expectations**

All participants served through the approved WDB waiver activities must be WIA eligible participants and meet any additional conditions specific to each waiver activity in the November 13, 2009 DOL letter.

The WDB is required to report performance outcomes for any individual served under each waiver in the Workforce Investment Act Standardized Record Data system. Therefore, all participants must be recorded in Automated System Support for Employment and Training (ASSET). The

## **Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010**

customized training and OJT service can be found in the Manage Services Menu. For adults and dislocated workers, the service is a Training service. For youth, the service is on-the-job training.

A new code will be added for the incumbent worker training waiver that should be used only if it is part of a lay-off aversion and restricted to skill attainment activities. Also, an edit will be added in ASSET to prevent associating customized training and on-the-job training services with Individual Training Account services.

In addition to the WDB annual performance data reporting, the State must address the impact these waivers had on the State's performance in the WIA Annual Report. WDBs will be asked to explain how the waiver(s) has changed the activities of the local areas, and how activities carried out under the waiver(s) have directly or indirectly affected local area performance outcomes.

Specific to the waivers on Incumbent Worker Training for lay-off aversion, On-the-Job Training, and Customized Training, the WDBs will need to provide a narrative annually to:

- Identify what sector partnerships were involved in training activities as part of the Industry Sector Partnership Initiative as well as the employer size;
- Discuss whether the sliding scales were effective for increased employer participation (for OJT and Customized Training if waivers were used), and if the training helped the employer maintain a competitive advantage;
- What/how were the factors that contributed to the success of these programs; and
- Identify how many participants were hired as a result of these waiver trainings.

**Action Required:** The policy is effective with this issuance.

**Submittal Information:** If a WDB waiver plan(s) is not included in the local plan, forward your waiver request(s) to your Local Program Liaison.

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### **Issued State Policy on Customized Training May 10, 2010**

**To:** Workforce Development Board Directors  
Job Service Directors

**From:** Ron Danowski, Administrator  
Division of Employment and Training

**Subject:** State Policy 10-06 on Workforce Investment Act Customized Training

**Purpose** To provide the State policy and procedures for statewide implementation of WIA-funded customized training with the State waiver

### **Legislative/Regulatory References**

WIA 1998 Public Law 105-220, section 101(8)  
WIA 1998 Federal Rules and Regulations, sections 663.715, 663.720 and 663.730  
November 13, 2009, Department of Labor Letter on Wisconsin's Waiver Requests  
WIA Policy Update 09-05: Pre-Award Criteria – Business Relocation/Expansion (120 Day Rule)

### **Background**

Customized training is designed to meet the specific training needs of an employer or group of employers through a training curriculum that is “customized” to a WIA participant’s skill needs. Under the terms of a customized training contract, the employer must commit to employ, or continue to employ, the workers upon successful completion of training. The U.S. Department of Labor (DOL) has approved a sliding scale for the statutory employer match based on the State's waiver request. [The WIA provision that is waived is the employer 50% match of the cost of the participant’s training]. Customized training may be developed for an employer who is hiring new employees as well as those currently employed by the employer. This form of training is an exception to the requirement under WIA to establish an Individual Training Account for eligible individuals to finance training services.

### **Policy**

The following guidelines are designed to assist staff in developing a customized training experience:

#### **A. Selection of Participants for Customized Training**

All participants, including those who may already be employed by the employer, must meet all WIA eligibility requirements, and receive both a core and an intensive service prior to the start of the customized training.

Customized training can be offered to incumbent workers under the following conditions:

1. The employed individual is not earning a self-sufficient wage as determined by the local Board; and
2. The training relates to the introduction of new technologies, new products or service procedures, upgrading to new jobs that require new skills, workplace literacy, or other purposes identified by the local Board.

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### B. Selection of Employers for Customized Training

Potentially eligible employers able to participate in customized training contracts include: private-for-profit businesses, private non-profit organizations, and public sector employers.

WDBs should ensure that customized training contracts are not written with employers who have failed to provide agreed upon employment to previous participants completing required training. WDBs may take into consideration an employer's past history with On-the-Job Training contracts, finances, layoffs, relocations, labor disputes, as well as the occupational and industry outlook, as a basis for assessing an employer's viability for customized training contracts.

### C. Occupational Eligibility

Customized training is allowable for occupations which are consistent with the participant's capabilities, are in demand occupations which will lead to employment opportunities enabling the participant to become economically self-sufficient and which will contribute to the occupational development and upward mobility of the participant on a career pathway.

Occupations selected for customized training shall meet, at the time of completion or per company policy, the following:

1. Full time permanent positions (minimum of 32 hours per week);
2. All participants shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. This will include unemployment compensation where the employer is normally required to provide such coverage to its employees; and
3. The position provides the participant benefits per company policy which have a monetary value (i.e., insurance, paid leave, profit sharing) other than those required by law.

Occupations under which individuals may not participate in customized training include, but are not limited, to the following:

1. Occupations depending on commission as the primary income source.
2. Professional occupations for which the trainee already possesses a license (e.g., real estate agent, insurance agent, etc.).
3. Occupations dependent on tips or gratuities as the primary income source.
4. Occupations which provide for only temporary or intermittent employment.

### D. Pre-Award Review

Prior to the development of a customized training contract, a pre-award review must be conducted to ensure that a business, or part of a business has not relocated from another location in the U.S., if the relocation results in any employee losing his or her job at the original location (see WIA Policy Update 09-05 for further information).

### E. Customized Training Contract

Customized training contracts must specify:

1. Name and address of requesting organization, business, or agency
2. Contact official, title, and telephone number
3. Cost of the proposed training

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- Total cost of the training
  - Total WIA funds requested
  - Total employer contribution (described in detail)
4. Description of proposed training
    - Need for training, based upon the individual skill sets of trainees
    - Occupational demand for trained individuals
    - Type of training to be provided
    - Length of proposed training
    - Location of training site
    - Target group for training
    - Number of individuals to receive training
  5. Training Plan
    - Objectives of the training
    - Specific skills to be learned
    - Method of instruction
    - Measurement of objectives and skill attainment of trainees
  6. Qualifications of training staff
  7. Employer involvement and commitment
    - Curriculum design meeting needs of employer
    - Commitment of the employer to employ participants who successfully complete the training
  8. Budget
    - Narrative explanation of how the funds will be utilized
    - An itemized budget
  9. Special health or safety equipment or precautions required (including those costs associated with accommodations, e.g., new software for such things as speech recognition, modified workstations, and workplace supports such as job coaching), if any.
  10. Special tools or uniforms required, if any, and whether or not the employer will supply them.
  11. Modification conditions and requirements.
  12. Contract termination conditions.

Customized training contracts are to contain appropriate assurances and certifications including:

1. Compensation for the participant at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills. Such rates may not be less than the higher of the federal or State minimum wage.
2. Provision of benefits and working conditions at the same level and extent as other employees of similar longevity and doing the same type of work. This will include unemployment compensation coverage where the employer is normally required to provide such coverage to employees. The employer must also secure worker's compensation or other insurance coverage for work-related injury of trainees.
3. Maintenance, retention, and access to records by the WDB, State, and Department of Labor personnel to support the training activity and associated reimbursements, i.e., time and attendance records, payroll records, invoice and reimbursement documents, and other information necessary to respond to monitoring reviews or audits (documentation of extraordinary costs is not required).
4. Prohibition on the use or proposed use of WIA funds as an inducement to a business or part of a business to relocate if the relocation results in any employee losing his/her job at the original location.
5. Prohibition on the use or proposed use of WIA training funds on any business or part of a business that has relocated from any location in the U.S., until the company has operated at the new location for 120 days, if the relocation resulted in any employee losing his/her job at the previous location.

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6. No customized training contract shall impair: (a) existing contracts for services; or (b) existing collective bargaining agreements, unless the employer and labor organization concur in writing with respect to any elements of the proposed activities which affect such agreement.
7. Assurance that adequate supervision will be provided at all time while the trainee is participating in the customized training.
8. Health and safety standards under Federal and State law equally applicable to customized training participants.
9. The employer must comply with civil rights law and regulations, including non-discrimination.
10. Prohibition on the use of WIA funds to directly or indirectly assist, promote, or deter union organizing or engaging in political activities (including lobbying) during training hours.
11. No officer, employee or other agent of the employer shall recommend hiring, decide hiring, establish salary/wage rate, or provide preferential supervisory treatment with respect to a trainee who is a member of the officer's, employee's or agent's immediate family.
13. Prohibition from being employed in the construction, operation or maintenance of any facility that is used for religious instruction or worship.
14. Prohibition on the use of funds for construction except for provision of reasonable accessibility and accommodation.

### F. Determining Length of Training

Customized training must be limited to the period of time required for the participants to become proficient in the occupation for which the training is being provided. The amount of training hours needs to take into account the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, the participant's individual employability plan and job accommodations that may be required. The contracted training hours cannot include those types of training normally provided by the employer for new employees such as orientation to the job/business, safety procedures, etc. Training guides, such as provided in ONET, the SVP and others, can be used to help determine the length of training.

### G. Developing the Training Plan

The customized training contract must include a training plan. The training plan, including skills to be learned and the time necessary to learn each skill must be sufficiently specific to permit verification that training was provided in accordance with the contract. The following guidelines apply to the development of a training plan:

1. Activities (the work statement) must be described clearly to show that the employer is obligated to conduct training.
2. Skills to be learned (measurable) should be separately listed with training times estimated for each.
3. Training times must be reasonable.
4. Training times must be geared to both the complexity of the job and the abilities of the trainee.
5. The training outline must identify the job title of the person(s) responsible for the training.
6. The training outline must include measurement and evaluation procedures.
7. The trainee, supervisor, and/or trainer should be knowledgeable about its contents.

### H. Employer Match Requirement

This sliding scale waives the WIA provision that requires the employer to pay for not less than 50 percent of the cost of the training. DOL approved the State's waiver request, and authorized the following employer contribution through a sliding scale based on the size of the business:

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- No less than 10% match for employers with 50 or fewer employees
- No less than 25% match for employers with 51-250 employees
- For employers with more than 250 employees, the current statutory requirement (50 percent contribution) continues to apply

The employee count is to include full-time and part-time workers, and workers placed through a private placement agency. This count is based upon the employer's total number of employees, not the number of employees to be trained. The count is to be on a company-wide basis for all locations within the State of Wisconsin; and the involved adjoining state when customized training is being offered to Wisconsin residents who work for employers in an adjoining state.

The employer may contribute in-kind costs to replace their cash contribution if the in-kind costs are above and beyond what the employer normally spends on training and operations. These costs must be specifically related to the customized training. Examples are:

1. Training rooms – If the employer had to rent a “special” room in which to specifically conduct the customized training versus one that is routinely available and requires no additional payment by the employer. That “special” room could count as in-kind costs because it is an extraordinary expense to the employer and is directly associated to the customized training.
2. Training materials – If these materials are developed specifically for the customized training and are not in the employer's possession for use after the training occurs, they may count as an in-kind contribution by the employer.
3. Training equipment – If additional equipment is purchased for the customized training, it cannot count as in-kind since the equipment would be a part of the employer's assets/inventory.

These in-kind contributions should be documented in the files just as cash contributions are for future audit purposes.

When determining the funding source for customized training, the WDB must use the appropriate program funds for the appropriate WIA-eligible population. The WDB may provide customized training to low-income and eligible employed adults with WIA Adult funds, and may provide customized training to dislocated workers with WIA Dislocated Worker funds. Customized training provided with statewide funds must serve WIA eligible individuals.

### Monitoring

The WDB must have policies and procedures in place to ensure that:

1. The training plan has measurable indicators of performance.
2. Evaluation of those indicators will occur to determine if skills identified in the training plan have been acquired.
3. Onsite visit(s) and other monitoring are conducted during the course of the training to determine compliance with WIA requirements, progress toward completion of the training plan and to resolve issues for the employer and/or participants.

### Performance

In addition to the WDB annual performance data reporting, the State must address the impact the customized training waiver had on the State's performance in the WIA Annual Report. WDBs will be asked to explain how the sliding scale for customized training contracts has changed the activities of the local area, and how activities carried out under the waiver have directly or indirectly affected the local area performance outcomes.

## **Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010**

Specific to the customized training waiver, the WDB will need to provide an annual narrative to:

1. Identify what sector partnerships were involved in training activities as part of the Industry Sector Partnership Initiative as well as the employer size;
2. Discuss whether the sliding scale was effective for increased employer participation, and if the training helped the employer maintain a competitive advantage;
3. Describe the factors that contributed to the success of these programs; and
4. Identify how many participants were hired as a result of the sliding scale waiver training.

### **Automated System Support for Employment and Training (ASSET) Reporting**

The WDB is required to report performance outcomes in the Workforce Investment Act Standardized Record Data System for all individuals served under the customized training waiver, and the State must report annually to DOL on this waiver. Therefore, all participants must be recorded in ASSET. The customized training service can be found in the Manage Services Menu. For adults and dislocated workers, the service is a Training Service. Also, an edit will be added in ASSET to prevent associating a customized training service with Individual Training Account services.

### **Action Required**

The WDB must:

1. Adjust their local policy to allow for the increased flexibility of the State waiver, and be consistent with the other elements of this policy;
2. Train or communicate to staff and contractors on the new sliding scale, and explain how they intend to implement it locally;
3. Establish or refine systems to evaluate the effect of the State waiver;
4. Revise any marketing to employers; and
5. Submit results of the new service strategy with the State waiver no later than August 15, 2010.

### **Questions and/or Technical Assistance and Training**

If you need additional information regarding this policy, please contact the Local Program Liaison assigned to your area.

## **Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010**

### **Issued State Policy for On-the-Job Training May 10, 2010**

To: Workforce Development Board Directors  
Job Service Directors

From: Ron Danowski, Administrator  
Division of Employment and Training

**Subject: State Policy 10-07 on WIA On-the-Job Training**

**Purpose** To provide the State policy and procedures for statewide implementation of WIA-funded On-the-Job Training (OJT) with the State waiver

#### **Legislative/Regulatory References**

WIA 1998 Public Law 105-220, section 101(31)

WIA 1998 Federal Rules and Regulations, sections 663.700 - 663.730 and 667.268

Workforce Programs Guide, Part 1, II. I. and Part 2, II.K

November 13, 2009, Department of Labor Letter on Wisconsin's Waiver Requests

WIA Policy Update 09-05: Pre-Award Criteria – Business Relocation/Expansion (120 Day Rule)

#### **Background**

On-the-Job Training can be an effective tool in assisting participants who, after receiving core and intensive services, have been unsuccessful in obtaining or retaining employment that allows for self-sufficiency. This form of training is an exception to the requirement under WIA to establish an Individual Training Account for eligible individuals to finance training services.

OJT is defined as paid training by an employer that is provided to a participant while engaged in productive work. An OJT:

- Provides knowledge or skills essential to the full and adequate performance of the job;
- Provides reimbursement to the employer of up to fifty percent of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training; and
- Is limited in duration appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant.

Payments made to employers are considered to be reimbursements for costs of training, including lower productivity, which are over and above normal training that would be provided to non-WIA eligible new hires. Extraordinary costs are defined as the difference between the costs of training and the productivity associated with employing WIA participants to costs associated with others similarly employed. Employers are not required to document such extraordinary costs.

The following guidelines are designed to assist staff in developing an OJT position. These guidelines will also assist in meeting the federal regulations which require that, to be allowable, costs incurred in the OJT contracting process must be necessary and reasonable.

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### On-the-Job Training

#### A. Identification of On-the-Job Training Need

An OJT contract is appropriate when the participant lacks the skills necessary to obtain or retain employment with that specific employer. The need for any OJT should also be identified in the individual employment plan wherein the participant's interests, abilities, and needs are identified.

#### B. Selection of Participants for OJT

At a minimum, an individual must receive at least one intensive service, such as development of an individual employment plan with a case manager or individual counseling and career planning, before the individual may receive training services. The individual must also have been unsuccessful in obtaining or retaining employment that allows for self-sufficiency. In addition, the case file must contain a determination of need for training services as identified in the individual employment plan, comprehensive assessment, or through any other intensive service received.

In most cases, on-the-job training is not an appropriate activity for youth participants under age 18. However, per WIA 664.460 (d), WDBs may choose to use this service strategy for eligible youth when it is appropriate based on the needs identified by the objective assessment of an individual youth participant.

An individual referred to the program by an employer (reverse referral) may be considered for OJT with the employer if the following conditions are met:

1. The individual has not already been offered the job;
2. The individual lacks the skills necessary for the job;
3. Because of the lack of skills, the employer will only hire the individual under an OJT contract;
4. The job is open to any qualified applicant; and
5. The individual has met eligibility requirements for intensive services and has received an assessment, and for whom an individual employment plan has been developed.

OJT contracts may be written for eligible employed workers when:

1. The employed individual is not earning a self-sufficient wage as determined by the local Workforce Development Board (WDB); and
2. The OJT relates to the introduction of new technologies, new products or service procedures, upgrading to new jobs that require new skills, workplace literacy, or other purposes identified by the WDB.

Individuals who have completed formal training via an Individual Training Account (ITA), but are at risk of not achieving employment within 90 days of training completion, may be considered for OJT if it creates an opportunity for a positive outcome.

#### C. Selection of Employers for OJT

Potentially eligible employers able to participate in OJT contracting include: private-for-profit businesses, private non-profit organizations, and public sector employers. Employment and employee leasing agencies may be eligible for OJT contracts if all other requirements are met and they provide permanent on-going employment (not probationary, temporary, or intermittent) in a specific occupation and they place employees at the worksite of another employer to perform work for such employer.

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An employer will not be eligible to receive WIA OJT training reimbursements if:

1. The employer has a history of failing to provide OJT participants with continued long-term employment with wages, benefits, and working conditions that are equal to those provided to other employees who have worked a similar length of time and who are doing the same type of work.
2. There is not a reasonable expectation of continuing employment in the occupation being trained for.
3. The employer is not in compliance with applicable assurances and certifications.

In addition:

1. WIA OJT is not an entitlement program for employers. The decision to enter into an OJT contract with an employer is at the discretion of the service provider.
2. Reimbursements for OJT are not intended to be wage subsidies to employers for normal hiring and training of employees; rather they are intended for extraordinary costs of training WIA participants. Some of these costs include more intense supervision, above average material wastage, abnormal wear on tools, down time, and a lower rate of production.
3. Payments made are reimbursement for regular "straight" time; for actual hours worked with no overtime premium, holiday pay, vacation, sick days, time spent on jury duty, or fringe benefits included.
4. OJT payments to employers may include scheduled pay raises or regular pay increases, comparable to similarly situated non-OJT employees.
5. DET recommends that participants under WIA OJT contracts comprise no more than 25% of the employer's employees. However, the WDB may make exceptions for a higher percentage on a case-by-case basis either for a particular employer or industry sector. A high percentage of OJTs at a single employer calls into question whether the funds are being used for business development/ subsidy without which the business would not exist/be sustainable. One requirement of OJT is to assess the participant's skills against the requirements of the job. If all/most of the trainees are OJT, it would be difficult to assess. In addition, the quality of training and supervision for a large number of OJT positions would be questionable.

### D. Occupational Eligibility

OJT is allowable for occupations which are consistent with the participant's capabilities, are in demand occupations which will lead to employment opportunities enabling the participant to become economically self-sufficient and which will contribute to the occupational development and upward mobility of the participant on a career pathway. Consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan.

Occupations selected for OJT shall meet, at the time of completion or per company policy, the following:

1. Full time permanent positions (minimum of 32 hours per week);
2. All participants shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. This will include unemployment compensation where the employer is normally required to provide such coverage to its employees; and
3. The position provides the participant benefits per company policy which have a monetary value (i.e., insurance, paid leave, profit sharing) other than those required by law.

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Occupations under which individuals may not be placed under an OJT contract include, but are not limited to the following:

1. Occupations depending on commission as the primary income source.
2. Professional occupations for which the trainee already possesses a license (e.g., real estate agent, insurance agent, bartender, etc).
3. Occupations dependent on tips or gratuities as the primary income source.
4. Occupations which provide for only temporary or intermittent employment.
5. A low-skilled occupation that would generally require little or no training (i.e., less than six weeks), which is considered to be the normal training period for any new employee.

Generally, consideration of high turnover jobs should be avoided. In certain situations, where the returns on investment, potential earnings, or needs of the specific customer warrant it, such opportunities may be acceptable.

### E. OJT Pre-Award Review

Prior to the placement of an OJT participant, a pre-award review must be conducted to ensure that a business, or part of a business, has not relocated from another location in the U.S., if the relocation results in any employee losing his or her job at the original location (see WIA Policy Update 09-05 for further information).

Prior to committing funds for OJTs, staff are encouraged to utilize an "OJT Checklist" to evaluate potential OJT employers (i.e., business size, length of time in business, type of business, percentage of workforce to be OJTs, previous OJT participation, adequacy of personnel and accounting systems, etc). This can assist in determining if the OJT experience will be of good quality, the employer is able to provide the training, and trainees will be retained into permanent employment that offers good pay and benefits, with opportunities for career advancement (see Attachment A for an example).

### F. Content of the OJT Contract

OJT contracts must specify:

1. occupation for which training is to be provided;
2. name of the participant to be trained;
3. immediate supervisor's name;
4. wage rate;
5. method and maximum amount of reimbursement;
6. beginning and ending dates of the contract;
7. job description and a training plan including training hours by skill areas or tasks;
8. special health or safety equipment or precautions required, if any;
9. special tools or uniforms required, if any, and whether or not the employer will supply them;
10. Any costs associated with reasonable accommodations for individuals with disabilities;
11. Modification conditions and requirements; and
12. Contract termination conditions.

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OJT contracts are to contain appropriate assurances and certifications including:

1. Compensation for the participant at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills. Such rates may not be less than the higher of the federal or State minimum wage.
2. Provision of benefits and working conditions at the same level and extent as other employees of similar longevity and doing the same type of work. This will include unemployment compensation coverage where the employer is normally required to provide such coverage to employees. The employer must also secure worker's compensation or other insurance coverage for work-related injury of trainees.
3. Maintenance, retention, and access to records by the WDB, State, and Department of Labor personnel to support the training activity and associated reimbursements, i.e., time and attendance records, payroll records, invoice and reimbursement documents, and other information necessary to respond to monitoring reviews or audits (documentation of extraordinary costs are not required).
4. Prohibition on the use or proposed use of WIA funds as an inducement to a business or part of a business to relocate if the relocation results in any employee losing his/her job at the original location.
5. Prohibition on the use or proposed use of WIA training funds on any business or part of a business that has relocated from any location in the U.S., until the company has operated at the new location for 120 days, if the relocation resulted in any employee losing his/her job at the previous location.
6. No currently employed worker shall be displaced by the OJT participant including a partial displacement such as a reduction in the hours of non-overtime work, wages, or employment benefits. The employer also agrees that no OJT participant shall be placed into a position that is currently vacated by an employee who is on layoff, involved in a work stoppage or on strike, or is open due to a hiring freeze, or into a position in which the employer has terminated the employment of any regular employee or otherwise reduced its workforce with the intention of filling the vacancy so created by hiring the eligible worker. The employer further agrees that this contract does not infringe in any way upon the promotional opportunities of current employees.
7. No OJT contract shall impair: (a) existing contracts for services; or (b) existing collective bargaining agreements, unless the employer and labor organization concur in writing with respect to any elements of the proposed activities which affect such agreement.
8. Assurance that adequate supervision will be provided at all time while the trainee is on the job site.
9. Health and safety standards under Federal and State law are equally applicable to OJT participants.
10. The employer must comply with civil rights law and regulations, including non-discrimination.
11. Prohibition on the use of WIA funds to directly or indirectly assist, promote or deter union organizing or engage in political activities (including lobbying) during work hours.
12. No officer, employee or other agent of the employer shall recommend hiring, decide hiring, establish salary/wage rate, or provide preferential supervisory treatment with respect to a trainee who is a member of the officer's, employee's or agent's immediate family.
13. Prohibition on being employed in the construction, operation or maintenance of any facility that is used for religious instruction or worship.
14. Prohibition on the use of funds for construction except for provision of reasonable accessibility and accommodation.

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### G. Determining Length of OJT Contract

An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. The amount of training hours needs to take into account the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, the participant's individual employability plan, job accommodations that may be required, and discussions with the employer. The contracted training hours cannot include those types of training normally provided by the employer for new employees such as orientation to the job/business, safety procedures, etc. In addition, consideration must be given to recognized reference materials such as ONET (see Attachment B for further details).

Generally, OJT contracts should not be done for less than six weeks or more than six months. Jobs that need less than six weeks training usually require no appreciable levels of training beyond periods of orientation that an employer would be expected to cover as part of their normal costs of doing business. Jobs that require more than six months of training to prepare a person for successful entry level employment usually are too costly to be suitable.

### H. Developing the Training Plan

The OJT contract must include a copy of the job description and training plan. The job description and training plan, including skills to be learned on the job and the time necessary to learn each skill, must be sufficiently specific to verify that training was provided in accordance with the contract. The following guidelines apply:

1. Activities (the work statement) must be described clearly to show that the employer is obligated to conduct training.
2. Skills to be learned (measurable) should be separately listed with estimated training times for each.
3. Training times must be reasonable.
4. Training times must be geared to both the complexity of the job and the abilities of the trainee (see Attachment A for guidance in determining the length of training).
5. Consideration must be given to recognized reference materials, such as ONET.
6. The training outline must identify the job title of the person(s) responsible for the training.
7. The training outline must include measurement and evaluation procedures.
8. The trainee, supervisor, and/or trainer should be knowledgeable about the training plan.
9. Consideration of reasonable accommodation(s), such as providing materials in an alternative format.
10. Identification of supportive services necessary for the individual to succeed.
11. The training site is accessible for individuals with disabilities and/or other special needs.

### I. Employer Reimbursement

This sliding scale waives the WIA provision that allows reimbursement to employers of up to 50 percent of the wage rate of an OJT participant for the extraordinary costs of providing the training and additional supervision related to the OJT. DOL approved the State's waiver request, and authorized the following reimbursement rate to employers through a sliding scale based on the size of the business:

1. Up to 90% for employers with 50 or fewer employees
2. Up to 75% for employers with 51-250 employees
3. The current statutory requirement of up to 50 percent for employers with over 250 employees

The employee count is to include full-time and part-time workers, and workers placed through a private placement agency. This count is based upon the employer's total number of employees, not the number of

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employees to be trained. The count is to be on a company-wide basis for all locations within the State of Wisconsin; and the involved adjoining state when OJT is being offered to Wisconsin residents who work for employers in an adjoining state.

The appropriate program funds must be used for the appropriate WIA-eligible population: OJT may be provided to low-income adults with WIA Adult funds, and to dislocated workers with WIA dislocated worker funds. OJT provided with statewide funds must serve WIA eligible individuals.

### **Monitoring**

The WDB must have policies and procedures in place to ensure that:

- The training plan has measurable indicators of performance.
- Evaluation of those indicators will occur to determine if skills identified in the training plan have been acquired.
- Onsite visit(s) and other monitoring are conducted during the course of the OJT to determine compliance with WIA requirements, including section 188, progress toward completion of the training plan and to resolve issues for the employer and/or participant.

Monitoring should also ensure that the participant is receiving the training contracted for at the wages in the OJT contract, and that the participant is not required to engage in activities prohibited by WIA. Employer records should also be reviewed to assure that the participant is receiving proper wages and that the employer is withholding taxes and paying workers compensation (or equivalent) insurance.

### **Performance**

In addition to the WDB performance reporting, the State must address the impact the on-the-job training waiver had on the State's performance in the WIA Annual Report. WDBs will be asked to explain how the sliding scale for OJT contracts has changed the activities of the local area, and how activities carried out under the waiver have directly or indirectly affected the local area performance outcomes.

Specific to the On-the-Job Training waiver, the WDB will need to provide an annual narrative to:

- Identify what sector partnerships were involved in training activities as part of the Industry Sector Partnership Initiative as well as the employer size;
- Discuss whether the sliding scale was effective for increased employer participation, and if the training helped the employer maintain a competitive advantage;
- Describe the factors that contributed to the success of these programs; and
- Identify how many participants were hired as a result of the sliding scale waiver training.

### **Automated System Support for Employment and Training (ASSET) Reporting**

The State is required to report performance outcomes in the Workforce Investment Act Standardized Record Data System for all individuals served under the OJT waiver. Therefore, all participants must be recorded in ASSET. The OJT service can be found in the Manage Services Menu. For Adults and Dislocated Workers, the service is a Training Service. For Youth, the service is on-the-job training. Also, an edit will be added in ASSET to prevent associating an On-the-Job Training service with Individual Training Account services.

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### **Action Required**

The WDB must:

- Adjust their local policy to allow for the increased flexibility of the State waiver, and be consistent with the other elements of this policy;
- Train or communicate to staff and contractors on the new sliding scale, and explain how they intend to implement it locally;
- Establish or refine systems to evaluate the effect of the State waiver;
- Revise any marketing to employers; and
- Submit results of the new service strategy no later than August 15, 2010.

### **Questions and/or Technical Assistance and Training**

If you need additional information regarding this policy, please contact the Local Program Liaison assigned to your area.

**SAMPLE**  
*On-the-Job Training Checklist*

**Information Items**

1. Business Name, Address and Contact Information

Name:

Address:

Contact Name:

2. How long has the employer been in business in this area?  
Is the business being sold or merging with another company?       Yes     No

3. What is the chief product or service?  
What is the NAICS Code?

4. How many full-time employees?  
How many new hires are anticipated in the next two (2) years?  
What job titles/job descriptions will need to be filled? (attach job descriptions if available)

5. Does the employer use a staffing agency?       Yes     No  
If so, which one?  
Describe the relationship.

6. Are jobs expected to last a year or more in the normal course of business?     Yes     No

7. What skills will current workers and new hires need to acquire to be fully productive?

8. Does the employer have sufficient equipment, materials and supervisory time and expertise to provide necessary training?       Yes     No

9. What are the turnover patterns and causes and could we do anything to help lower turnover?

10. What licenses or entry qualifications do the workers need?

11. How many hours per week are trainees expected to work?  
What are the expected shift times and days?

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12. Are any jobs based upon commissions, tips, piece work or incentives?  Yes  No  
Is there a base wage that commissions, tips, piece work or incentive pay is added to?  
 Yes  No  
If yes to either of the above, what entry earnings may be expected for each job?

13. Which fringe benefits are provided to regular employees?

When are these benefits made available?

### **Assurances and Compliance Items**

14. Does the employer have a payroll system which records all pay checks and amounts?  Yes  No  
Can we verify wage payments quickly onsite?  Yes  No  
If no to either, how will wages be verified for OJT payment?
15. What is the Workers' Compensation carrier (or an equivalent system)?  
Will OJT trainees be covered?  Yes  No
16. Are any of the jobs considered for an OJT "independent contractors" or not employed by the firm during the entire training period?  Yes  No
17. Are any of these jobs covered by a collective bargaining agreement?  Yes  No  
If so, obtain and attach a "concurrence letter" from the union(s).
18. Are any employees currently on layoff?  Yes  No
19. Are there any outstanding wage and hour, health and safety, or discrimination complaints or adverse decisions?  Yes  No
20. What percentage of previous trainees, over the last two (2) years, have completed training and been retained by the firm? Number of OJTs \_\_\_\_\_; Number of employees retained \_\_\_\_\_; and \_\_\_\_\_% retained. If the retention percentage is below 75%, what improvements are planned?

**On-the-Job Training State Policy  
GUIDANCE ON USING SPECIFIC VOCATIONAL PREPARATION (SVP)  
SYSTEM TO DETERMINE LENGTH OF TRAINING**

The amount of time needed for On-the-Job Training (OJT) depends on several factors regarding each trainee: (1) prior work experience and education; (2) skills, knowledge and abilities; and (3) any barriers that would affect the length of the training time. The training time cannot include those types of training normally provided by the employer for new employees such as orientation to the job/business, safety procedures, etc. The length of the training is then determined by assessing and documenting the above factors for each trainee and by determining the usual time that is needed to train for the occupation or job. The trainee assessment is completed through the individual employment plan process and the length of job training is determined by the Specific Vocational Preparation (SVP) system after an analysis of the tasks involved in the OJT job. The SVP is the amount of lapsed time required by a typical worker to learn the techniques, acquire the information, and develop the facility needed for average performance in a specific job-worker situation.

The job title should be specified by the employer. The case manager then enters this into the O\*Net system (<http://online.onetcenter.org>) to determine the SVP of the job. Entering the job title in the search box may bring up an array of job titles from which to choose the most applicable. The job tasks can then be determined by reviewing the employer's job description and/or the job tasks listed on the O\*Net summary report for that occupation. Along with the employer, the case manager should pick out the 5 to 7 most important job tasks for which the trainee needs to be trained, and identify any reasonable accommodation(s) as appropriate for the individual. The trainee's assessment is then used to determine the skill level of each task and the length of the training plan.

**Example:**

The employer job title is bookkeeper but the job duties involve mostly payroll and timekeeping. Enter "bookkeeper" in the O\*Net search box and then pick Payroll & Timekeeping Clerk from the job titles and go to the Payroll & Timekeeping Clerk summary report. This page shows the O\*Net Code, 43-3051.00, which could be entered on the Training Plan form. The Job Zone section (lower on the same page) shows the SVP code for this occupation is 6.0 to 7.0.

The SVP hours can then be determined from the chart below. Since the SVP for a Payroll & Timekeeping Clerk is above the maximum allowed ("5" which translates to 26 weeks), the training plan period for this position is limited to 26 weeks. For a thorough discussion of the SVP system see <http://online.onetcenter.org/help/online/svp>

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### Maximum Hours:

The maximum hours for training according to the SVP Code are:

<b>SVP</b>	<b>Maximum Hours</b>	<b>Minimum Weeks</b>
1	0	0
2	240	6
3	520	13
4	800	20
5+	1,040	26

Note: The training hours noted on the scale above give the maximum allowable hours for a given SVP. The training time may be determined on the basis of the variables of the job, the actual demands of the job stated in the job description and the training plan, and the previous education, training, skills, and/or experience of the trainee. The training hours may also be adjusted for reasonable accommodation for persons with disabilities or other individual needs which may affect the number of hours the trainee needs to acquire the skill(s). The SVPs above represent the average amount of time required to learn the techniques, acquire information, and develop the facility needed for average performance in a specific job-customer situation. Training hours should generally not exceed the SVP hours unless special needs are documented; however, in no case may they exceed 1040 hours.

The training time and reimbursement rate must be negotiated with each employer on an individual basis, depending upon the employer needs and the training requirements of the trainee. In all cases, the case notes/case file for the participant should indicate the basis for determining the number of hours of training included in the OJT contract.

## Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010

### On-the-Job Training State Policy GUIDANCE ON USING SPECIFIC VOCATIONAL PREPARATION (SVP) SYSTEM TO DETERMINE LENGTH OF TRAINING

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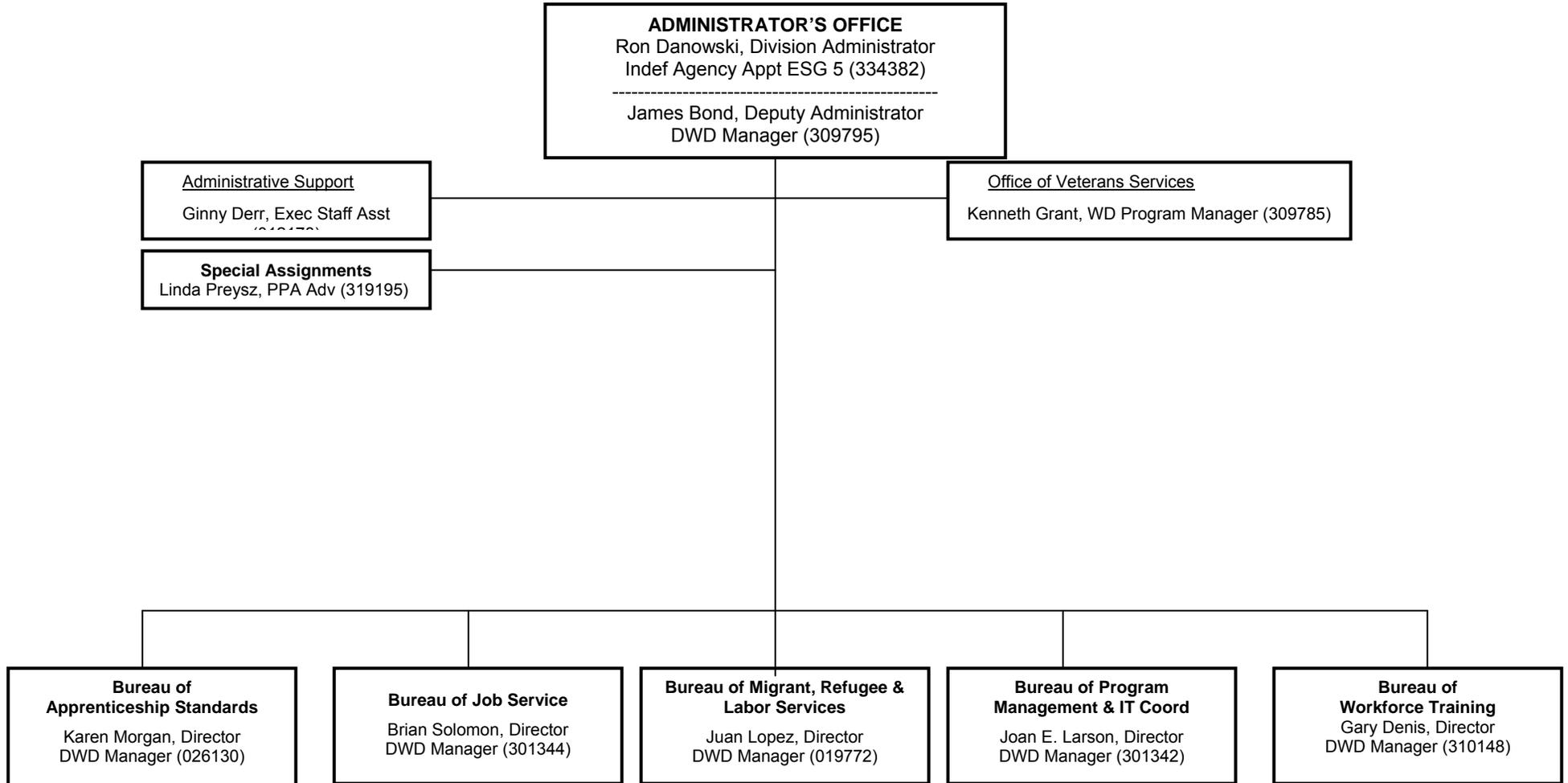
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The training time and reimbursement rate must be negotiated with each employer on an individual basis, depending upon the employer needs and the training requirements of the trainee. In all cases, the case notes/case file for the participant should indicate the basis for determining the number of hours of training included in the OJT contract.

Attachment G

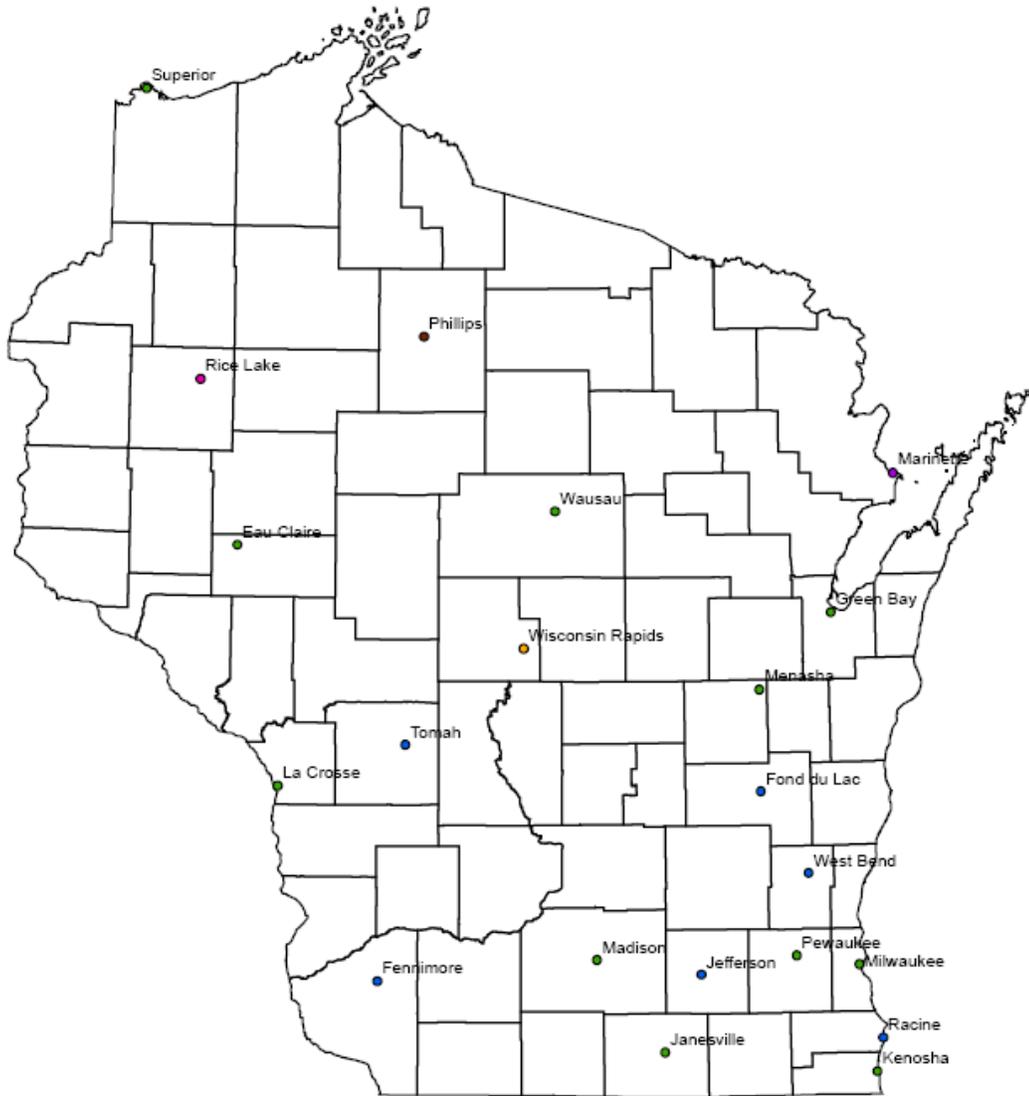
DET Organization Chart

**DIVISION OF EMPLOYMENT AND TRAINING**



**Attachment H**  
**Comprehensive Job Center Map**

# 22 Wisconsin Job Centers



Wisconsin Department of Workforce Development, Labor Market Information  
File: S:\DET\BWT\LMIArcGIS\Heather\requests\JobService\job centers 2008 buffers.mxd

1/29/2009

## Attachment I

### Complaints/Grievances and Appeals

#### **S. COMPLAINTS/GRIEVANCES AND APPEALS.**

These are the procedures DWS grantees/contractors, employees, applicants for or participants in DWD-funded programs, and other parties affected by the operations of DWD-funded programs shall use to resolve complaints/grievances and appeals regarding alleged violations of DWD grants, its related regulations, applicable Wisconsin statutes, other applicable federal or state requirements, the provisions of this document or the terms of a DWD grant agreement or contract.

**1. General Requirements** for processing complaints/grievances and appeals.

**a. Program and Grant Responsibilities.** DWD grantees shall establish and maintain complaint/grievance and appeal procedures that conform to DWD Grant and other applicable federal and state requirements. To be valid, systems for resolving DWD Grantee complaints/grievances must provide for due process.

(1) The elements of due process:

- (a) Notice to the parties of the specific charges and the responses of those involved;
- (b) Reasonable timing;
- (c) An impartial decision-maker;
- (d) The right of the parties to representation;
- (e) The right of each party to present evidence both in writing and through witnesses;
- (f) The right of each party to question others who present evidence; and
- (g) A decision made strictly on the recorded evidence.

(2) The grantees must:

- (a) Describe their complaint/grievance and appeal procedures in their DWD grant agreements.
- (b) Assure that their subgrantees are informed of and maintain procedures consistent with the requirements of this section.
- (c) Require that every employer who hires participants under DWD-funded programs shall maintain complaint/grievance and appeal procedures, which include the employer's terms and conditions of employment as described in WIA Title I Section 122 (h)(1) and applicable collective bargaining agreements.
- (d) Follow their own written procedures in resolving WIA Title I complaints/grievances at the local level.
- (e) Post complaint/grievance and appeal procedures in a prominent place(s) and ensure that DWD grant participants are made aware of their rights regarding complaints/grievances, appeals, and hearings.
- (f) Retain all records about complaints/grievances and appeals for a period of three years or beyond three years if the complaints/grievances and appeals are not resolved or are under audit, investigation, or litigation.

**b. Final Authority on Decisions.** The DWS administrator, on behalf of the Governor, has the final decision-making authority on complaints/grievances arising from the administration, implementation and operation under DWD grants.

**c. Forms for Filing Complaints/Grievances.** The DWS Complaint Information Form must be used for all formal complaints/grievances filed with DWS. Local agencies may modify the form for their own use as long as they comply with basic complaint/grievance filing requirements.

**d. Technical Assistance.** DWS shall provide technical assistance to grantees or other parties needing information on complaint/grievance procedures and related issues.

**e. One-Stop Complaint Procedures.** DWS in conjunction with its grantees and other federal financial assistance partners has instituted a Job Center Complaint Coordination System (JCCCS) in all Wisconsin Job Centers. Each Job Center has a Complaint Coordinator. The

Coordinators refer complaints, regardless of program fund source, to the appropriate entity within or outside of the Job Center.

**2. Complaint/Grievance Preparation.**

**a. Written and Within One Year.** The complainant shall file a written complaint/grievance within one year after the alleged violation took place.

**b. Addressed to Respondent.** Complaints/grievances should be addressed to the appropriate respondent agency.

**c. Accurate and Complete.** A complaint/grievance must be sufficiently accurate and complete to be evaluated on its own. It is suggested that formal complaints/grievances be notarized.

**d. Establishment of Filing Date.** The filing date of a complaint/grievance is established when a complainant submits a written complaint/grievance that provides:

(1) The full name, telephone number (if any), and address of the person(s) or organization(s) making the complaint/grievance;

(2) The full name and address of the respondent against whom the complaint/grievance is made;

(3) A clear and concise statement of the facts, including pertinent dates constituting the alleged violation;

(4) The provisions of the DWD grant, the regulations, or other applicable agreements believed to have been violated;

(5) A statement disclosing whether the complaint/grievance has been cross-filed with any other jurisdiction and whether these other proceedings have commenced or been concluded, including dates, authorities, and other pertinent information.

**e. Response by recipient grantee.** The grantee shall acknowledge receipt of a complaint/grievance in writing within five (5) working days. Where possible the file date should be included in the response.

**3. Requirements for Complaints/Grievances Alleging Discrimination.**

**a.** Section 188 of Title I of WIA prohibits discrimination on the basis of age, disability, sex, or on the basis of race, color, or national origin, political affiliation or belief, status as a program participant, or against beneficiaries on the basis of citizenship/status as a lawfully admitted immigrant authorized to work in the United States. Complaints/grievances alleging a violation of WIA Title I s.188 and 29 CFR, Part 37.70 – 37.114, regarding discrimination will be processed as follows:

(1) The complaint may be filed either with the United States Department of Labor (DOL) Director of the Civil Rights Center (Director/Civil Rights Compliance (CRC) – the cognizant federal agency for discrimination complaints) or DWS. (2) The Director/CRC, for good cause shown, may extend the filing time deadline. This time period for filing is for the administrative convenience of the Directorate and does not create a defense for the respondent.

(3) Any person who elects to file a complaint with DWS shall allow DWS 90 calendar days to process the complaint.

(4) DWS has adopted procedures which allow any party to a discrimination complainant to request Alternative Dispute Resolution (ADR) or mediation of their complaint. ADR allows disputes to be resolved in a less adversarial manner and is totally voluntary. The complainant may file a complaint with the Director/CRC within 30 days should ADR fail to provide a satisfactory resolution of the complaint. The Equal Rights Division of DWD will provide ADR or mediation for parties requesting this method of resolving discrimination complaints.

(5) If, by the end of 90 calendar days, DWD has not completed processing the complaint, has failed to notify the complainant of the resolution, or has offered a resolution not satisfactory to the complainant, including ADR, the complainant may, after the 90 calendar days have passed, file a complaint with the Director/CRC by completing and submitting CRC's Complaint Information and Privacy Act Consent Forms. The complaint must be filed no later than 30

calendar days after DWD has issued a final decision or 90 days have passed. In any event, the complaint must be filed with CRC no more than 120 days after the complaint was initially filed.

(6) The Director/CRC shall, at the conclusion of the investigation, advise the complainant and respondent whether there is reasonable cause to believe that a violation of the nondiscrimination and equal opportunity provisions of a DWD Grant or 29 CFR, Part 37, has occurred.

(7) A complainant has 180 days to file a discrimination complaint.

**b. Discrimination Based on State Fair Employment Statutes.** Complaints/grievances alleging a violation of the State of Wisconsin's Fair Employment Statute, 111.31-111.395, Stats., regarding discrimination must be filed with the DWD-Equal Rights Division (ERD) within 300 days after the alleged discrimination took place. Complaints/grievances filed with the DOL-CRC may be cross-filed with the state DWD-ERD. The Fair Employment Statute extends protection to classes not covered under federal law, such as arrest/conviction record, marital status, sexual orientation, military reserve status, and use of lawful products. Complaints/grievances appealed to the Equal Rights Division must be filed using the ERD Discrimination Complaint Form. A link to this form follows: <http://www.dwd.state.wi.us/er/pdfs/ERD-4206a-F.pdf>

#### **4. Requirements for Complaints/Grievances Alleging Noncriminal Violations other than Discrimination.**

**a. Grantee as Respondent.** When a DWD grantee is a respondent to complaints/grievances about the administration, implementation, and operation of its DWD-funded employment and training programs, the following procedures must be used:

(1) The complainant shall file a written complaint/grievance within one year after the alleged violation took place.

(2) The grantee shall review the complaint/grievance to determine if it was filed within the one-year time limit and if it falls within the jurisdiction of the DWD Grantee and WAA. If the criteria are not met, the grantee shall provide the complainant with written notice of the rejection of the complaint/grievance and the reasons for that rejection. If the criteria are met, the grantee shall provide the complainant with written notice of the acceptance. The filing date shall be included in the notice.

(3) After accepting the complaint/grievance, the grantee shall:

(a) Conduct a hearing within 30 calendar days of the filing date; and

(b) Issue a decision to the complainant within 60 calendar days of the filing date.

(4) Format for a written decision.

(a) Summary Statement that identifies issue(s) being contested and which caused the hearing to be called. Include citation of law(s), rule(s), regulation(s), policy(ies), and agreements alleged to have been violated.

(b) Findings of Facts, which enumerates items the hearing examiner accepts as facts based upon demonstration of support (documentation) from complainant's and respondent's presentation of facts and opinions.

(c) Conclusion is a brief summary of the facts, which affirm or deny assertions made by parties at the hearing.

(d) Decision should be based on the conclusion(s) and provide a remedy for final resolution.

(e) Appeal rights must be included in the written decision. This statement of appeal rights shall include how, where, and how much time the aggrieved party has to appeal the decision.

(5) After receiving an adverse decision or no decision on a complaint/grievance within 60 calendar days, the complainant may file an appeal requesting a state level independent review. This appeal must be filed with DWD within the following time limitations:

(a) The complainant must file the appeal within 10 calendar days after the complainant received the decision; or

(b) If the complainant did not receive a decision, the complainant must file the appeal within 15 calendar days after the decision was due.

(6) After accepting a complaint/grievance that has been appealed from the grantee level requesting a state level review, the DWS administrator, on behalf of the Governor, shall review the case and issue a final decision within 30 calendar days after the appeal was filed.

(7) Appeal. A complaint alleging that DWD, on behalf of the Governor, has not issued a decision within 60 days after a complaint is filed or the party to such decision receives an adverse decision may appeal these issues to the Secretary of Labor. The Secretary shall make a final determination no later than 120 days after receiving such an appeal.

**b. DWD as Respondent.** When DWD is a respondent to complaints/grievances about the administration, implementation, and operation of its DWD-funded employment and training programs, the following procedures shall be used.

(1) The complainant must file a written complaint/grievance within one year after the alleged violation took place. For a complaint or grievance involving audit resolution, an appeal must be filed between 15 and 30 days after the issuance of the determination letter, as detailed in the letter.

(2) DWD must review the complaint/grievance to determine if it was filed within the one-year time limit and if it falls within DWD's jurisdiction. If the criteria are not met, DWD shall provide the complainant with written notice of the rejection of the complaint/grievance and the reasons for that rejection. If the criteria are met, DWD shall provide the complainant with written notice of the acceptance of the complaint/grievance.

(3) After accepting the complaint/grievance, DWD shall:

(a) Appoint a hearing examiner;

(b) Conduct a hearing within 30 calendar days of the filing date; and

(c) Issue a decision to the complainant within 60 calendar days of the filing date.

(4) After receiving an adverse decision or no decision on a complaint/grievance within 60 calendar days, the complainant may file an appeal requesting a state level independent review. This appeal must be filed with DWD:

(a) The complainant must file the appeal within 10 calendar days after the complainant received the decision; or

(b) If the complainant did not receive a decision, the complainant must file the appeal within 15 calendar days after the decision was due.

(5) After accepting the appeal, DWD shall designate a review officer to conduct the state level independent review.

(6) After reviewing the case file and (if needed) gathering additional information, the Independent Review Officer shall issue a recommended decision to the DWS administrator within 30 calendar days after the appeal was filed. The DWS administrator may accept, reject, or modify the Independent Review Officer's recommended decision.

(7) The DWS administrator must, on behalf of the Governor, issue a final decision within 30 calendar days after accepting the request for a state level independent review.

**c. Employer/Work-training Provider as Respondent.** When an employer or work-training provider acting under agreement with a DWD grantee/contractor is a respondent to complaints/grievances about the administration, implementation, and operation of DWD-funded employment and training programs, including complaints of unlawful employee displacement by a DWD program participant, the following procedures must be used:

(1) The complainant shall file a written complaint/grievance within one year after the alleged violation took place.

(2) The grantee or contracting agency shall review the complaint/grievance to determine if it was filed within the one-year time limit, if it falls within the jurisdiction of the DWD grantee/contractor, and if it meets grievance/complaint criteria under WIA or TANF/W-2. If the criteria are not met, the grantee shall provide the complainant with written notice of the rejection of the complaint/grievance and the reasons for that rejection. If the criteria are met, the

grantee/contractor shall provide the complainant with written notice of the acceptance. The filing date shall be included in the notice.

(3) After accepting the complaint/grievance, the DWD grantee/contractor shall contact the respondent, investigate the complaint, and attempt to reach an informal resolution.

(4) If an informal resolution cannot be reached, the grantee/contractor shall:

(a) Conduct a hearing within 30 calendar days of the filing date.

(b) Issue a decision to both the complainant and respondent within 60 calendar days of the filing date.

(5) Format for written decision.

(a) Summary Statement that identifies issue(s) being contested and which caused the hearing to be called. Include citation of law(s), rule(s), regulation(s), policy(ies), and agreements alleged to have been violated.

(b) Findings of Facts, which enumerates items the hearing examiner accepts as facts based upon demonstration of support (documentation) from complainant's and respondent's presentation of facts and opinions.

(c) Conclusion is a brief summary of the facts, which affirm or deny assertions made by parties at the hearing.

(d) Decision should be based on the conclusion(s) and provide a remedy for final resolution.

(e) Appeal rights must be included in the written decision. This statement of appeal rights shall include how, where, and how much time the aggrieved party has to appeal the decision.

(6) After receiving an adverse decision or no decision on a complaint/grievance within thirty calendar days, either the complainant or the respondent (or both) may file an appeal requesting a state-level independent review. This appeal must be filed with DWD within the following time limitations:

(a) The complainant and/or respondent must file the appeal within 10 calendar days after they received the decision; or

(b) If the complainant and/or respondent did not receive a decision, they must file the appeal within 15 calendar days after the decision was due.

## **5. Requirements for Complaints/Grievances Alleging Incidents of Fraud and Abuse Violations of DWD Grants**

**a. Notification of Requirements.** All WDAs and other organizations receiving DWD funds shall respectively notify the LEO, WDB members, employees, subrecipients, all DWD grant participants, and the general public of the contents of this subsection.

**b. Nationwide System for Reporting Incidents.** The DOL-ETA, in conjunction with the Office of Inspector General (OIG) has established a nationwide system to report any suspected or actual incidents of fraud and abuse. Under this system, the following procedures will apply to DWD grant recipients.

(1) Individuals who become aware of any allegation or complaint/grievance about possible fraud, misfeasance, nonfeasance, or malfeasance, misapplication of funds, gross mismanagement, and employee or participant misconduct involving DWD grant programs or operations should report that information as follows:

(a) Staff of WDAs or statewide grantees shall within one working day, file an Incident Report using the DWD Grant Fraud and Abuse Incident Report form and submit it to DWD according to procedures on the back of the form.

(b) Staff of program operators other than WDAs or statewide grantees or members of the public may report suspected incidents of fraud and abuse either to the local WDA Administrative Entity or to DWD.

(c) It is not the intent of the DOL or DWD to limit use of the Incident Report to elicit information only after an act or allegation has already been determined legally prosecutable. On the contrary, any act that raises questions concerning possible illegal expenditures or other unlawful activity should be reported immediately.

(2) Complainants who fear that their positions will be compromised if they submit information through the WDA/DWD reporting system may send an Incident Report directly to the OIG, P.O. Box 1924, Washington, D.C., 20013, or telephone the OIG's hotline that is maintained for public use by individuals who want to report a suspected wrongdoing. The toll free number is (800) 424-5409. The OIG is required to respond to hotline referrals within 30 days.

(3) The identity of individuals who provide information will not be disclosed unless they consent or the OIG determines that disclosure is unavoidable during the course of an investigation. The DOL prohibits reprisal against any employee who discloses information about wrongdoing or makes a valid complaint/grievance. Wisconsin's "Whistle Blower Law" provides similar protection for most state employees (230.80-230.89, Stats. & 895.65, Stats.)

**c. DWD Reports to DOL.** DWD must submit a DOL Incident Report within five working days to the DOL regional administrator, who must immediately refer it to the Regional Inspector General for Investigation for disposition.

**d. Follow-up on Reports.** Any DWD grantee that has reported an incident of alleged fraud and abuse shall follow up on these cases and work with DWD, appropriate governmental agencies, and, where necessary, law enforcement agencies, such as the district attorney and the Federal Bureau of Investigation, during the investigation and resolution of the case. For any **reported incident of fraud and abuse, the affected grantee shall do the following:**

(1) Investigate the matter in question, have it investigated by appropriate authorities, or if requested, assist with official investigations.

(2) During the resolution of the allegations, ensure that necessary documents are made available, that witnesses and other parties involved in the incident are contacted, that records are maintained, and that the investigatory process is proceeding smoothly.

(3) If the investigation results in disallowed costs, follow the local debt collection process to recover the funds.

(4) Once a fraud report has been transmitted to DWD, interim reports must be submitted when the status of an investigation changes or the grantee is aware of material changes in the methods of resolving the incident. Once an incident has been resolved, a final report is required to close out the case.

**e. DWD Assistance.** On behalf of the Governor, DWD is responsible for overseeing the integrity of DWD grant programs in the state and providing assistance to grantees in the resolution of cases involving allegations of fraud and abuse. DWD will assist in the investigation and resolution of cases as appropriate, monitor progress and prepare applicable reports.

**6. DWD Hearing Process.** DWD will use the following procedures to conduct hearings when it is the respondent in complaints/grievances. Grantees may use these procedures or follow their own procedures if based on the elements of due process previously listed.

**a. Hearing Request and Response.** The complainant may request a hearing by submitting a written request to DWD. DWD will schedule the hearing within 30 days after the complaint/grievance filing date and provide written notice to both parties, including the date, time, and place; issues to be decided; and relevant background material.

**b. Open to Public.** The hearing is informal and is open to the public.

**c. Hearing Provisions.** The complainant and the respondent should both attend the hearing. During and prior to the hearing, DWD will apply the following rules:

(1) Complainants may amend the complaint/grievance at any time prior to the hearing.

(2) Complainants may withdraw the request for a hearing in writing prior to the hearing.

(3) Complainants or respondents may request rescheduling of the hearing for good cause within the prescribed 30-day limit.

(4) Complainants and respondents may be represented by an attorney or other representative of their choice.

(5) Complainants and respondents may bring witnesses and provide/submit documentary evidence.

(6) Respondents/grantees and/or subgrantees shall produce requested records or documents relevant to the issues and kept in the ordinary course of business. Both parties may examine all evidence presented at the hearing.

(7) Complainants and respondents may question any witnesses or parties to the hearing.

**d. Hearing Examiner's Role and Hearing Provisions:**

(1) The role of the hearing examiner prior to the hearing:

- (a) Prepare and review of the case file;
- (b) Determine the issues involved, affected laws, regulations, or other rules;
- (c) Formulate a set of questions for use at the informal hearing; and
- (d) Determine limits of pre-hearing discovery to be allowed.

(2) The role of the hearing examiner during the hearing:

- (a) Make a record of the hearing;
- (b) Ensure that the hearing procedure is followed;
- (c) Rule on motions (standard courtroom rules of procedure need not apply);
- (d) Determine the order of witnesses, question witnesses, take testimony, and maintain order; and
- (e) Accept evidence and/or exhibits during or after testimony and discourage lines of inquiry not relevant to the original complaint/grievance.

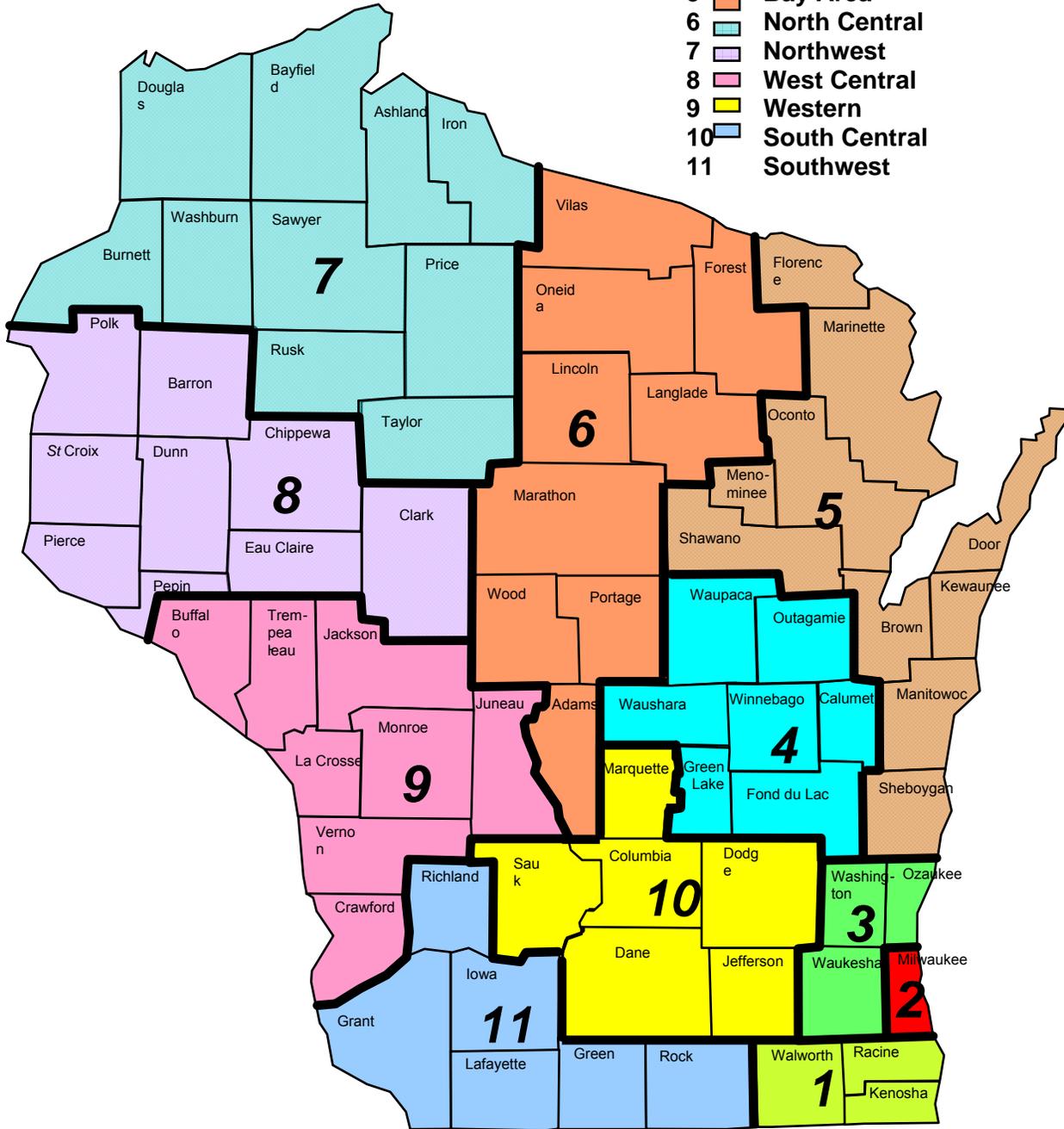
(3) The role of the hearing examiner after the hearing:

- (a) Not discuss the case with any of the parties;
- (b) Consider and evaluate all relevant facts, evidence and arguments; and
- (c) Formulate and transmit a written decision to all parties, including applicable appeal or civil remedies the complainant may pursue.

Attachment J  
WDA Map

**Wisconsin's Workforce Development Areas**

- 1 Southeast
- 2 Milwaukee County
- 3 Waukesha-Ozaukee-Washington
- 4 Fox Valley
- 5 Bay Area
- 6 North Central
- 7 Northwest
- 8 West Central
- 9 Western
- 10 South Central
- 11 Southwest



**Attachment K**

**Monitoring Guidelines**

*Program Year 2007*

**Desk Review Survey**

***Workforce Investment Act (WIA) Title IB  
(Adult, Dislocated Worker and Youth)***

Department of Workforce Development  
Division of Employment and Training (DET)  
Bureau of Workforce Training, Local Services Section  
201 E. Washington Avenue, P.O. Box 7972  
Madison, WI 53707-7972

**The Desk Review Survey is a part of the Workforce Development Area (WDA) program review process. Its purpose is to assist you and DET staff to prepare for the upcoming on-site visit. Prior to the onsite review, a desk review is conducted. A variety of information is used in doing so, including your response to this survey.**

Please submit the completed Desk Review Survey and requested documents to your DET Local Program Liaison (LPL) at least three weeks prior to your scheduled on-site monitoring visit. Failure to return the Monitoring Survey by the due date may result in a monitoring finding and/or ineligibility for additional grant funding opportunities. The Desk Review Survey and all attachments **must be submitted electronically. Hard copies are not required.**

Thank you for your assistance in completing this portion of the Program Year (PY) 07 review process. Please contact your LPL if you have any questions or concerns.

Theresa Loerke (608) 264-8179  
Karen Pfeil (608) 266-9663

[theresa.loerke@dwd.state.wi.us](mailto:theresa.loerke@dwd.state.wi.us)  
[karen.pfeil@dwd.state.wi.us](mailto:karen.pfeil@dwd.state.wi.us)

**Monitoring**

Please submit the Workforce Development Board’s (WDB’s) Monitoring Plan, schedule and monitoring instruments.

**Local Policy Updates**

Please submit (**electronically**) any changes to WDB local policies for your WIA programs since the last WDB local plan submission. If no changes have been made indicate by “N/A”. These policies include:

- a. Priority of service policy for intensive services (“insufficient funds” analysis)
- b. Priority of service policy for training services (“insufficient funds” analysis)
- c. Veteran’s Priority for: (a) Job Center Services; and (b) priority of service policy
- d. Local “income-based” eligibility determination policy for serving adult participants

WIA Title IB Adult, Dislocated Worker and Youth Programs

**1. Identify current Adult Program Service Providers**

Service Provider	Counties/Job Centers/Target Groups or Services

**2. Identify current Dislocated Worker Program Service Providers**

Service Provider	Counties/Job Centers/Target Groups or Services

3. Please review the Youth Service Provider listing at [www.dwd.state.wi.us/dwdwia/youth/default.htm](http://www.dwd.state.wi.us/dwdwia/youth/default.htm) and identify any changes.

### **35% High Wage Training**

1. Provide the names and Personal Identification Numbers (PINs) for all participants counted in the 35% high wage training category during Program Year 2007. Please indicate if they are considered in the “career ladder” path. Include the training program, identified career, training costs, and supportive services costs for each participant.

### **Job Center Standards and Criteria**

1. Please submit (electronically) Attachment A (Job Center Standards for Comprehensive Job Centers) forms for Program Year 2007 for each of the Comprehensive Job Centers (CJC) in your WDA since they were last submitted as part of Program Year 2006 WDB monitoring. The Attachment A form to complete is attached. Attachment B provides instructions for how to complete this form.
2. If any new Comprehensive Job Centers (CJC) has been created since Program Year 2006 monitoring, please submit a copy of the following:
  - A copy of the Board action (e.g., agenda, minutes, etc.) which approved the designation of the new CJC.
  - Data shared with the Board to assist them in making their decision to certify the new CJC.

**Job Center Service Standards  
for Comprehensive Job Centers (CJCs)**

WDA \_\_\_\_\_  
Date Completed \_\_\_\_\_

CJC Location \_\_\_\_\_

<b>Standards 1a. - 1i. General Provisions</b>			
Describe the Job Center's major goals and priorities for these General Provisions in PY2007			
Wisconsin Job Center Service Standards (Note: Refer to the published Job Center Service Standards)	Attain- ment Status (FM, PM, NM)*	Accomplishments to Date (July 1, 2007 to present)	Planned Activities (Who? What? Where? When? How?)
Standard 1. General Provisions			
1a. Level of Service			
1b. Veterans			
1c. Customers Make Informed Choices			
1d. Services are Coordinated			
1e. Program Information is Accessible			
1f. Accommodations			
1g. Customers Receive Services			
1h. Customers are Treated with Respect			
1i. Privacy and Confidentiality			

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<b>Standards 2a. - 2f. Staff Competencies</b>			
Describe the Job Center's major goals and priorities for these Staff Competencies in PY2007			
Wisconsin Job Center Service Standards (Note: Refer to the published Job Center Service Standards)	Attainment Status (FM, PM, NM)	Accomplishments to Date (July 1, 2007 to present)	Planned Activities (Who? What? Where? When? How?)
Standard 2. Staff Competencies			
2a. Community Resources			
2b. Referral Process			
2c. Job Center Tools/Tech			
2d. Special Needs			
2e. Privacy and Confidentiality			
2f. Customer Service Techniques			

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<b>Standards 3a. - 3d. Job Center Effectiveness</b>			
Describe the Job Center's major goals and priorities for these Job Center Effectiveness Standards in PY2007			
Wisconsin Job Center Service Standards (Note: Refer to the published Job Center Service Standards)	Attainment Status (FM, PM, NM)	Accomplishments to Date (July 1, 2007 to present)	Planned Activities (Who? What? Where? When? How?)
Standard 3. Job Center Effectiveness			
3a. All Customers Served in a Timely Manner			
3b. Customer Satisfaction			
3c. Other Continuous Improvement Models			
3d. An Evaluation Created Locally			

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<b>Standards 4a. - 4i. Job Seeker Services Standard</b>			
Describe the Job Center's major goals and priorities for these Job Seeker Services Standards in PY2007			
Wisconsin Job Center Service Standards (Note: Refer to the published Job Center Service Standards)	Attainment Status (FM, PM, NM)	Accomplishments to Date (July 1, 2007 to present)	Planned Activities (Who? What? Where? When? How?)
Standard 4. Job Seeker Services Standard			
4a. Info on education, employment and training			
4b. Info on local services			
4c. Info on Pre- and Post-Support Services			
4d. Initial, comprehensive and Specialized Assessments			
4e. Career Planning			
4f. Current Job Openings			
4g. Assistance with Job Search			
4h. Info on Unemployment Insurance (UI)			
4i. Financial Literacy Training			

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<b>Standards 5a. – 5i. Employer – Business Services Standard</b>			
Describe the Job Center’s major goals and priorities for these Employer – Business Services Standards in PY2007			
Wisconsin Job Center Service Standards (Note: Refer to the published Job Center Service Standards)	Attainment Status (FM, PM, NM)	Accomplishments to Date (July 1, 2007 to present)	Planned Activities (Who? What? Where? When? How?)
Standard 5. Employer – Business Services			
5a. Writing Job Descriptions			
5b. Placing Job Orders			
5c. Recruiting Qualified Job Applicants			
5d. Labor Market Info			
5e. Employer Events			
5f. Accommodations			
5g. Info on Retention and Post-Employment Support			
5h. Info on Workplace and Customized Training			
5i. Enhanced Business Services			

### Instructions for Completing Job Center Service Standards Form

The Job Center Service Standards apply to all Comprehensive Job Centers (CJC) and their Access Points of Service (APS) in the WDA. CJCs are expected to meet all Job Center Service Standards and APS are expected to meet any Job Center Service Standards that apply to them.

#### Goals and priorities:

For Job Center Service Standards #1 - #5, identify the Workforce Development Board's (WDB's) major goals and priorities. In this section, also include goals and priorities that have been identified for the Comprehensive Job Center or the APS that may not be reflected in the Job Center Service Standards. For example, a Job Center may have goals for offering a service in addition to those required under the Job Center Service Standards.

#### For each Standard and every subpart of the Standard:

- Provide an assessment of the present attainment status of the Standard.
- Describe activities and accomplishments that have occurred to date that address the requirements of the Standard and that support the assessment that you have provided of the present attainment status of the Standard.
- Identify activities planned to address the requirements of that particular Standard including expected outcomes and target dates for objectives to be reached.

#### Attainment Status:

- Use the "Attainment Status" column to indicate your assessment of the extent to which each Standard has been met. Note: There is a row to indicate the attainment status for the entire Standard as well as each subpart of the Standard. **In order for the entire Standard to be fully met, each subpart of the Standard must also be fully met.**
- For each Standard (row) or part thereof, e.g., 3a, use the following abbreviations to indicate the attainment status that applies. Use FM for "fully met", PM for "partly met", and NM for "not met."
- Base the assessment of the attainment status for any Standard on the description of the Standard as published in "Wisconsin's Job Center Service Standards." The Standards are numbered so you can match the table to the published document. (See Attachment H of the December, 2005 Local Plan Guidelines) [http://dwd.wisconsin.gov/dwdwia/docs/local\\_plan\\_guidelines123005.doc](http://dwd.wisconsin.gov/dwdwia/docs/local_plan_guidelines123005.doc)

**Accomplishments to Date (July 1, 2007 to present):**

- Use this column to describe actions that have been completed to meet each Standard.
- Activities described here should support the assessment (i.e. FM, PM, NM) you have provided for the attainment status of that Standard.

**Describe Planned Activities:**

- Describe planned activities that contribute to meeting the Standard.
- Include expected outcomes and target dates for completing activities.
- Be sure a reviewer can read any part of your description and answer especially “Who?” “What?” “Where?” “When?” and “How?”
- Include key plans regardless of how they will be funded.
- Since Job Center development is a process of continuing improvements, it is necessary to identify and describe planned activities for every Job Center Service Standard even if it is identified as being “Fully Met.”
- For any Standard assessed “Partly Met,” describe what has been done to partly meet the Standard, and what is planned in order to fully meet the Standard in the future.
- If there are no plans to fully meet a Standard, that should be stated and a rationale provided for that decision.

**Coordination of Funds:**

***Identifying Data***

WDA \_\_\_\_\_ Date of Review \_\_\_\_\_

DET Staff Reviewer(s) \_\_\_\_\_

WDB Staff Interviewed \_\_\_\_\_

***PURPOSE***

The purpose of the Program Year (PY) 2007 Coordination of Funds Guide is to look at the impact of various funding sources and to identify best practices.

***ONSITE REVIEW*** activities focus on collecting information from the workforce development boards (WDB) to share with Department of Workforce Development (DWD) management.

***DESK REVIEW*** of Workforce Investment Act (WIA) activities is used to review existing information prior to conducting the onsite review with the objective of identifying particular issues and concerns that may need attention or discussion during the onsite review.

**Sources of Information for the desk review:**

1. WIA Local Plan Part 2;
2. WIA Regulations 20 CFR 663.320;
3. Veteran Program Letter 01-05 published by DWD on April 13, 2005; and
4. WIA Regulations 20 CFR 663.600.

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1. How are you supplementing WIA Title 1 funding for adult basic education (ABE) activities?
  - List the funding sources which are providing ABE activities to WIA participants such as the Carl D. Perkins Career and Technical Education Act (Perkins IV), WIA Title II Adult and Family Literacy, and WIA Title 1B.
  - Describe the ABE activities being provided including who is providing the services, for how many participants, and when and where these services are provided.
  - Describe if the services are provided free of charge or payment is required. If payment is required, describe how it works. (e.g. Job Center in-kind partner contribution, contract, pay by the hour, pay a set fee by individual, etc.)
  - What is the total dollar amount of WIA Title 1 funds being spent in a program year on ABE activities?
  - If ABE activities are not being provided free of charge for WIA participants, provide an explanation of why not.
  - If the local area has written policies related to this question, the Local Program Liaison should collect copies.
2. How are you supplementing WIA Title 1 funding for training activities?
  - Does the WDB ensure that all WIA participants enrolled in training apply for grant assistance from other sources (e.g. Pell grants) so that WIA funds supplement other sources of training grants?
  - Describe the process used to ensure that the participant applies for the funding, receives a response, shares the response with the case manager, and how the financial aid is used by the participant.
  - Is the participant allowed to keep the financial assistance if they have unmet needs such as living expenses for housing, childcare, food, transportation, etc.? How does the WDB ensure that there is not duplication in the supportive services they provide and what the participant receives through financial aid?
  - How does the WDB ensure that there is not duplication in tuition, books, training related supports such as tools and supplies that they provide and what the participant receives through financial aid?
  - Is there a difference in the provision of WIA assistance if the participant received an educational loan versus an educational grant?
  - How are WIA funds dispersed, or not, for a participant who received an educational loan?
  - If the local area has written policies related to this question, the Local Program Liaison should collect copies.
3. How are WIA case managers helping WIA participants with veterans status get training services under the Wisconsin GI Bill administered by the State Department of Veterans Affairs? How are you maximizing the use of veteran training funds? How are you ensuring there is no duplication in the expenditure and reimbursement of veteran training funds and WIA funds?
4. Describe which agencies and programs that WIA participants are referred to for providing additional services for WIA participants. (i.e., Food Shares, Veterans Services, Child Care Assistance, WETAP, etc.)
5. How are intake staff and case managers made aware of agencies and programs discussed in #1-4 above?
6. If you have to stop new enrollments in training or intensive services due to funding limitations, how are you ensuring that the priority of service participants continue to receive priority? Describe if, and when, the WDB had to implement its priority of services policy in the past two years. Provide an assessment of the outcomes/ramifications.

### OBSERVATIONS AND CONCLUSIONS

Use this form to summarize issues and concerns. To the degree possible, note recommendations and follow-up steps to be taken, along with how this will be accomplished, in particular, as well as any technical assistance needs identified.

1. Based on the interview, are there any concerns about the WDB's practices for ensuring funds are coordinated?
2. Were any problems, issues, or technical assistance needs identified?

3. Are there any best practices that could be shared with other WDAs?
4. What are the recommended actions?
5. Is follow-up required? If so, when?

### Summary of Review

WDA \_\_\_\_\_ Date of Review \_\_\_\_\_

DET Staff Reviewer(s) \_\_\_\_\_

WDB Staff Interviewed \_\_\_\_\_

**Summary and Observations.** Summarize the strengths (including best practices) and weaknesses identified.  
**Follow Up Needed.**

**Technical Assistance Needs.** Identify technical assistance needs of the WDB or program provider.

### 35% Policy:

#### **PURPOSE**

The purpose of the Program Year (PY) 2007 Workforce Investment Act (WIA) 35% High Wage Training Monitoring Guide is to collect information on the second year of operation of the 35% high wage training policy. This policy is currently being reviewed by a re-engineering workgroup which will make recommendations to change the policy to be more workable.

**ONSITE REVIEW** primarily focuses on comparing the first year of this policy to the second year of operation. Local input will be collected and shared with Department of Workforce Development (DWD) management and provide additional data for the re-engineering workgroup.

**DESK REVIEW** of the PY07 35% participant activities and expenditures will be reviewed prior to conducting the onsite review. The objective of this review is to identify particular issues and concerns that need attention and discussion during the onsite review.

#### **Sources of Information for the desk review:**

- Local submitted information on 35% participants;
- WIA Local Plan Part 2;
- Administrator's Memo 06-11;
- Frequently Asked Questions (FAQ) on WIA 35%; and
- Wisconsin Technical College *Graduate Follow-Up Report*.

### Training Funds for Higher Wage Jobs

1. Based on the desk review, you have attained \_\_\_ % of high wage occupational training. This is an increase/decrease from last year. What are you doing to improve your performance?
2. What are your case managers doing to encourage WIA participants in need of training to pursue high wage occupational training?
3. Based on the desk review, \_\_\_\_\_ % of the participants counted in the 35% are in career ladder slots. Explain how your career ladder approach to high wage occupational training works.
4. What criteria do you use to provide supportive services to high wage occupational training funded by WIA?

5. What criteria do you use to provide supportive services to high wage occupational training funded by sources other than WIA?
6. Given that there is virtually unanimous commitment to high wage training but concerns with how the policy is implemented, what suggestions do you have to improve policy implementation?

#### OBSERVATIONS AND CONCLUSIONS

Use this form to summarize issues and concerns. To the degree possible, note recommendations and follow-up steps to be taken, along with how this will be accomplished, in particular, as well as any technical assistance needs identified.

1. Based on the interview, are there any concerns about the WDB's progress in meeting the 35% expenditure requirement for training leading to high wage jobs?
2. Were any problems, issues, or technical assistance needs identified?
3. Are there any best practices that could be shared with other WDAs?
4. What are the recommended actions?
5. Is follow-up required? If so, when?

#### Youth:

##### **PURPOSE**

The purpose of the Program Year (PY) 2007 review of the Workforce Investment Act (WIA) Youth Program is to determine whether the program is being implemented in accordance with the provisions of WIA Rules and Regulations and the local WIA Plan. Additionally, the review should identify best practices and technical assistance needs.

**ONSITE REVIEW** activities focus on implementation of major program activities. Onsite review is complemented and supplemented by ongoing activities throughout the program year, such as plan reviews and attendance at local meetings.

**DESK REVIEW** of WIA activities should be used to review existing information prior to conducting the onsite review with the objective of identifying particular issues and concerns that may need attention or discussion during the onsite review.

##### **Sources of Information for the desk review:**

5. Youth Program-Related parts of the WIA Local Plan;
6. Local WIA policies related to the Youth Program;
7. Job Center System Data Warehouse reports showing participant enrollments and activities;
8. WIA youth participant data in ASSET; and
9. PY07 quarterly performance reports.

**Note:** The Division of Employment and Training plans to request a waiver from U.S. Department of Labor (DOL) to report performance outcomes for DOL's Common Measures beginning in PY08. You may also be aware that improvement of participant data is a featured component of our WIA State Plan for performance improvement. Reporting of basic skills deficiency and test data that are needed to compute the Youth Literacy and Numeracy Gains performance measure is a desk review activity for our PY08 monitoring cycle. We are reviewing ASSET data for youth who have not exited from the program. No findings will be issued as a part of this review. Your ASSET User group representatives will receive a comprehensive analysis of currently active WIA Title 1 youth participants (both in-school and out-of-school youth) with recommendations for improving the

quality of these data in ASSET. A summary of this review will be included in our final monitoring reports under the youth program section.

The following information is being collected and will also be reflected in the youth program section of the final monitoring report.

1. Describe the outreach and recruitment process for in-school and out-of-school youth. Describe how it is determined who gets into the program and who does not. Describe referrals, services, etc. provided to youth who are not enrolled in the WIA youth program.
2. Describe the services provided and identified in the Individual Service Strategy (ISS) to assist youth who are basic skills deficient? Include who the providers are, the cost, how the youth's progress is monitored, and how it is determined that the youth has reached an acceptable level.
3. Does the WDB specify a minimum basic skills test score which determines if the youth will/or will not be enrolled in WIA? If the youth is at or below this score, where are they referred for services?
4. Describe youth strategies, services, and activities which make your youth program a year-round program versus a summer work experience program only.
5. Describe what leadership development activities are provided for youth. Include the number of youth involved and frequency of these activities.
6. Describe the tutoring services provided for youth. Include who provides this service, the cost, frequency, and how it is determined who will obtain this program element.
7. What is the impact of the youth program on the local economy?
8. What is the impact of the youth program on the schools?
9. How are you coordinating the WIA Youth Program with other local youth programs and initiatives such as Project Lead the Way, Science, Technology, Engineering, and Math (STEM) fields, Youth Apprenticeship Program, etc.

#### 10. OBSERVATIONS AND CONCLUSIONS

Use this form to summarize major findings, issues, and concerns. To the degree possible, note recommendations and follow-up steps to be taken, along with how this will be accomplished, in particular, as well as any technical assistance needs identified.

Based on the interview, are there any concerns about the WDA's youth program?

Were any problems/issues/technical assistance needs identified?

Are there any best practices that could be shared with other WDAs?

What are the recommended actions?

Is follow-up required? If so, when?

#### **Job Center Criteria:**

##### ***PURPOSE***

The purpose of the Program Year (PY) 2007 Workforce Investment Act (WIA) Job Center Service Standards Monitoring Guide is to determine whether the Workforce Development Area (WDA) has at least one Comprehensive Job Center as required by WIA. A Job Center must meet all of the standards in order to be certified as a Comprehensive Job Center (CJC). Access Points of Service (APS) are expected to meet any Job Center Service Standards that apply to them.

***ONSITE REVIEW*** will assess if CJs are meeting the Job Center Service Standards and address any concerns and/or clarifications on CJs and their APS. Onsite review is complemented and supplemented by ongoing activities throughout the program year, such as plan reviews and attendance at local meetings.

**DESK REVIEW** is used to review existing information prior to conducting the onsite review with the objective of identifying particular issues and concerns that may need attention or discussion during the onsite review.

**Sources of Information for the desk review:**

- WIA Local Plan for PY07-08;
- Criteria for Certifying Comprehensive Job Centers Checklists;
- Job Center Service Standards for Comprehensive Job Centers Checklists; and
- Memorandum of Understanding (MOU) for the CJC.

**Criteria and Service Standards for Certifying Comprehensive Job Centers**

1. The Local Program Liaison (LPL) will follow up on any issues identified in the Program Year 2007 Desk Review Survey submitted by the WDB.
2. Has the Workforce Development Area (WDA) implemented changes identified in response to Program Year 2006 monitoring?
3. Have the changes made by the WDA met the intent if not the letter of the policy?
4. Describe any significant changes in any of the WDA's Comprehensive Job Centers or Access Points of Service since PY06 monitoring (change in status from CJC to APS, closings, reductions in hours, service delivery, staff cuts, locations, phone numbers, Job Center Contacts, etc.).
5. Does the WDA have a strategy to increase/decrease the number of job centers? Explain.
6. What is the WDA's strategy to provide services in areas where centers have had to close?

**OBSERVATIONS AND CONCLUSIONS**

Use this form to summarize issues and concerns. To the degree possible, note recommendations and follow-up steps to be taken, along with how this will be accomplished, in particular, as well as any technical assistance needs identified.

Based on the interview, are there any concerns about the WDB's certified CJC(s)?  
Were any problems, issues, or technical assistance needs identified for the WDB's CJC(s)?  
Are there any best practices that could be shared with other WDAs?  
What are the recommended actions?  
Is follow-up required? If so, when?

**Fiscal:**

In general: In the past 18 months, has there been any turnover in the key agency staff, i.e. comptroller, procurement manager, agency director, etc?

Has there been any change in the organizational structure of the agency, including closure of Job Center sites?

Have there been any significant changes in policies or financial processes, including approvals, cost allocation, etc.

**A – 1: Cost Allocation: Vendor / Ck # / Amount / Note**

--

**A – 2: Subcontracts: Agency / Dates / Award / Amount**

--

**A – 3: Direct Labor: Staff / Dates / Timesheets / PD**

--

**A – 4: Other Direct Costs: (Invoices, Subcontracts) Vendor / Ck # / Amount / Note**

--

**A – 5: Support Service Payments: Vendor / Ck # / Amount / Note**

--

**Notes**

--

	Yes/ No	w/p ref	By	Date
<b>A-1      <u>Cost Allocation</u></b>				
1) When was the agency cost allocation plan last updated? What was the latest date it was reviewed or approved by the Board?				_____ _____
2) Is there a separate resource sharing plan for each Job Center in the Job Center agreement? When was the last time it was updated?	_____			_____
3) Does the plan address the allocation of shared revenues as well as shared costs? (i.e. rental of meeting or classroom space?)	_____			
4) Review one month of allocations to assure the plan is being followed.				
5) Are cost pools reduced to zero monthly?	_____			
6) Is the CAP regularly updated for new or deleted revenue sources and does it include a current organization chart?	_____			
10) Sample 12 transactions from the cost pool: Costs must be documented, allowable and treated consistently				
<i>Note: The cost distribution base should not include large subcontract amounts, nor direct client benefit payments which can skew the allocation.</i>				

**A-2.      Sub-Contracts**

- |  |       |       |       |       |
|--|-------|-------|-------|-------|
| 1) Provide a list of subcontracts related to DWD programs. |       |       |       |       |
| 2) Sample contracts for the following:                     |       |       |       |       |
| 3) Do the current subgrantee contracts have:               | _____ | _____ | _____ | _____ |

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	Yes/ No	w/p ref	By	Date
a) Cover page (dates, amount, signed) _____				
b) Terms / conditions _____				
c) Lobbying/Debarment _____				
d) Program plan (narrative) _____				
e) Budget _____				
f) Modifications _____				
4) Do the subgrantee budgets have:	_____	_____	_____	_____
a) Cost reim or fixed fee stated _____				
b) Line item budget detail, if reim _____				
c) Cost/unit, if fixed fee _____				
d) Consistency with program plan _____				
e) Proper subgrantee invoices _____				
f) Revised budgets, if needed _____				
5) Does the agency:	_____	_____	_____	_____
a) Maintain separate subcontract files _____				
b) Maintain a list of subcontracts _____				
c) Maintain a summary of payments _____				
d) Monitor programs, send a report _____				
e) Maintain audit register _____				
f) Review & close audit reports _____				
6) Are subgrantee invoices:	_____	_____	_____	_____
a) Submitted timely _____				
b) Describe services done _____				
c) Approved by agency staff _____				
d) Compared to budget _____				
e) Actual not budgeted amounts paid _____				

**A-3. Single Audit (of the agency)**

- 1) Were there any audit findings or comments on the latest audit? If so, follow up on the resolution. \_\_\_\_\_
- 2) Does the auditor prepare the agency's financial statements as part of their work? \_\_\_\_\_

**A-4. Agency Policies and Controls**

- 1) When was the Financial Policy Manual last reviewed and approved by the Board? \_\_\_\_\_
- 2) Where is the official copy kept?
- 3) Do staff know how & where to access it? \_\_\_\_\_

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	Yes/ No	w/p ref	By	Date
4) Do staff know how to access DWD and DOL data? (Admin Memos, manuals, regulations, etc.)				
4) Does the agency have a policy for capitalizing and depreciating equipment purchased for program use? Provide a chart of equipment and a schedule of use/depreciation.	_____			
a) For DWS charges, is the equipment use comparable to the depreciation claimed?	_____			
b) Is the equipment allocated by its use?	_____			
c) Is the life expectancy used reasonable?	_____			
d) Is the straight-line depreciation method used?	_____	_____	_____	_____
e) Does the agency maintain inventory records?	_____	_____	_____	_____
f) Did charges for depreciation end when the equipment was disposed of, removed from service, or had its life expectancy end?	_____	_____	_____	_____
g) Are real estate improvements treated as equipment?	_____	_____	_____	_____
h) If the agency owns it's building, do a review of total costs and how it is charged, maintenance and depreciation allowances, etc.				
5) Review prior monitoring.				
A) Have all 'closed' items been followed up?	_____	_____	_____	_____
B) Have all 'open' items been corrected? Discuss and/or obtain data.	_____	_____	_____	_____
6) Is the agency incorporating Sarbanes-Oxley Act? (For-profit/publicly traded companies must follow completely).	_____	_____	_____	_____

**A-5 Procurement**

1) When was the procurement policy last updated? (See Financial Policy)	_____	_____	_____	_____
2) How is competition for service contracts maximized?	_____	_____	_____	_____
3) How are the youth services contracts bid? Are the services split up or the area split up to generate more competition?				

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- |   | Yes/<br>No | w/p<br>ref | By    | Date  |
|---|------------|------------|-------|-------|
| 4) Is all internal or sole source activity justified?<br>Review files for any sole source or internal awards. | _____      | _____      | _____ | _____ |
| 5) Is the RFP preparation and review kept separate from any bid preparation?                                  |            |            |       |       |

**A-6) Direct Labor:**

- |   |       |       |       |       |
|---|-------|-------|-------|-------|
| 1) Select 4 employees charged to DWD programs.  | _____ | _____ | _____ | _____ |
| 2) Are job descriptions current and accurate?   | _____ | _____ | _____ | _____ |
| 3) Were the labor costs charged to the proper award? (direct cost & pool cost)  | _____ | _____ | _____ | _____ |
| 5) Were costs charged to the proper time period?  | _____ | _____ | _____ | _____ |
| 6) Were timesheets prepared timely and signed by employee & supervisor?   | _____ | _____ | _____ | _____ |
| 7) Does the time/salary charged to agency awards equal the amount paid to employees?  | _____ | _____ | _____ | _____ |
| 8) Do timesheets record 100% of employee's time?  | _____ | _____ | _____ | _____ |
| 9) Does 1 document exist per employee per pay period?   | _____ | _____ | _____ | _____ |
| 10) Are time studies, if any, done properly?  | _____ | _____ | _____ | _____ |
| 11) Survey the top salaried employees, and verify that for any over the DOL salary cap, the wages charged to DOL funding sources are limited to the capped amounts. (Currently \$165,500) |       |       |       |       |

**A-7) Other Direct Costs:**

- |   |       |       |       |       |
|---|-------|-------|-------|-------|
| 1) Select sample of Direct Costs & Subcontract Costs. | _____ | _____ | _____ | _____ |
| 2) Are there purchase orders, invoices?               | _____ | _____ | _____ | _____ |
| 3) Are the POs approved prior to purchase?            | _____ | _____ | _____ | _____ |
| 4) Are costs program related?                         | _____ | _____ | _____ | _____ |
| 5) Are costs incurred within the contract period?     | _____ | _____ | _____ | _____ |

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	Yes/ No	w/p ref	By	Date
6) Are costs actual, reasonable, necessary?	_____	_____	_____	_____
7) Are costs charged to the proper award and line code?	_____	_____	_____	_____
8) Are invoices: verified, approved, cancelled?	_____	_____	_____	_____
<b>A-8) <u>Fiscal Reporting on CORE:</u></b>				
1) Does latest claim reconcile to agency ledger?	_____	_____	_____	_____
2) Were costs reported on the correct line code?	_____	_____	_____	_____
3) Were the last 2 claims submitted timely?	_____	_____	_____	_____
<b>A-9) <u>Participant Support Payments</u></b>				
1) Select sample of payments. Are payments allowed per the case file? (child care, mileage, work items, EA, JAL)	_____	_____	_____	_____

**Best Practices:**

The purpose of the Program Year 2007 (PY07) Best Practices Monitoring Guide is to create an inventory of WDA activities and success stories for inclusion in the PY07 WIA Annual Report and to satisfy various requests received throughout the year from the Department of Workforce Development (DWD) Secretary's Office, other state workforce development boards (WDB), various federal and state agencies, private non-profit organizations, etc.

**ONSITE REVIEW** activities focus on collecting information from the workforce development boards to share with DWD management and other sources identified above. In certain cases, DWD may need to contact the WDB for further information other than what is collected during the onsite review.

Provide two or three best practices in the following categories using this format:

Project/Situation:

Description:

Partners:

Outcomes:

Contact:

- **Customers:** Adult, In-School Youth, Out-of-School Youth, Dislocated Workers, Co-Enrolled Participants, and Employers.
- **Service Provision:** Short-term and long-term training, employer relations, employment recruitments, and Job Center services.
- **Grants:** Specialized grant achievements.
- **Regional Partnerships:** Regional partnership activities with economic development and education partners.
- **Special Projects:** Adult and Dislocated Worker projects that have had a profound impact on the economy.
- **Other**

Attachment L

Comprehensive Job Center Standards

One-Stop Job Center Requirements and Standards of Service

As established in § 662.100 (a) of the WIA Regulations, ...the One-Stop delivery system is a system under which entities responsible for administering separate workforce investment, educational, and other human resource programs and funding streams (referred to as One-Stop partners) collaborate to create a seamless system of service delivery that will enhance access to the programs' services and improve long-term employment outcomes for individuals receiving assistance.

Integral to the accomplishment of that goal, the Act establishes Federal, State and Local responsibilities to establish a system of one-stop job centers through out the nation. In Wisconsin, a Comprehensive One-stop Center is a physical location where, at a minimum, WIA Title 1b core services are provided and Wisconsin Job Service and Wisconsin Division of Vocational Rehabilitation staffs are located. There must be at least one comprehensive center in each Workforce Development Area. Each comprehensive one-stop center must provide the following:

Core Services: WIA 134(b)(2)

1. Determination of an individual's eligibility to receive assistance from WIA
2. Assistance in establishing eligibility for programs of financial aid for training and education programs not funded under the WIA and available in the local area.
3. Outreach, intake, and orientation to the information and other services available through the Job Center system.
4. Initial assessment of occupational and soft skill levels, aptitudes, abilities, and supportive service needs.
5. Job search and placement assistance, and where appropriate, career counseling;
6. Access to WORKnet and WisCareers, or, provide of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including--
  - (i) job vacancy listings in such labor market areas;
  - (ii) *information on job skills necessary to obtain the jobs described in clause (i); and*
  - (iii) *information relating to local occupations in demand and the earnings and skill requirements for such occupations;*
7. Access to the State Eligible Training List
8. Information regarding local area performance measures and any additional performance information for the one-stop delivery system in the local area.
9. Information about and referral to supportive services, including childcare and transportation in the local area
10. Information regarding filing claims for unemployment compensation.
11. Follow-up services (including counseling) for WIA participants placed in unsubsidized employment, for at least *12 months after the first day of employment.*

Access to Intensive Services: WIA 134(d)(3)(C)

1. Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include--
2. diagnostic testing and use of other assessment tools; and
3. in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
4. Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals.
5. Group counseling.

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6. Individual counseling and career planning.
7. Case management for participants seeking training services under paragraph (4).
8. Short-term prevocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training.

Access to Training Services: WIA 134(d)(4)(D)

1. occupational skills training, including training for nontraditional employment;
2. on-the-job training;
3. programs that combine workplace training with related instruction, which may include cooperative education programs;
4. training programs operated by the private sector;
5. skill upgrading and retraining;
6. entrepreneurial training;
7. job readiness training;
8. adult education and literacy activities provided in combination with services described in any of clauses (1) through (7); and
9. customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Access to other programs and activities carried out by the One-Stop partners

The One-stop partners are:

1. WIA Title I
2. Adult Education and Family Literacy (WIA Title II)
3. Job Service (WIA Title III)
4. DVR (WIA Title IV)
5. Temporary Assistance to Needy Families/WI W-2 (Added by the Governor)
6. Food Stamp E & T and Food Stamp Workfare (check name)
7. Senior Community Service Employment Program- Older Americans Act
8. Carl D. Perkins Vocational and Applied Technology Education
9. Trade Adjustment Assistance (and NAFTA-TAA)
10. Veterans E & T Services & local veteran's outreach programs
11. Community Services Block Grants
12. Housing and Urban Development E & T Activities
13. Unemployment Insurance
14. Native American Programs (*if present in the WDA*)
15. Migrant and Seasonal Farm Worker Programs (*if present in the WDA*)
16. Job Corps (*if present in the WDA*)
17. Youth Opportunity Grants (*if present in the WDA*)
18. Veterans Employment and Training Program (*if present in the WDA*)

While each local area must have at least one comprehensive center (and may have additional comprehensive centers), WIA section 134(c) allows for arrangements to supplement the comprehensive center. These arrangements may include:

1. A network of affiliated sites that can provide one or more partners' programs, services and activities at each site;
2. A network of One-Stop partners through which each partner provides services that are linked, physically or technologically, to an affiliated site that assures individuals are provided information on the availability of core services in the local area; and
3. Specialized centers that address specific needs, such as those of dislocated workers.

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The design of the local area's One-Stop delivery system, including the number of comprehensive centers and the supplementary arrangements other service locations, must be described in the local plan and be consistent with the Memorandum of Understanding executed with the One-Stop partners.

Each Memorandum of Understanding shall contain provisions describing--

1. the services to be provided through the one-stop delivery system;
2. how the costs of such services and the operating costs of the system will be funded;
3. methods for referral of individuals between the one-stop operator and the one-stop partners, for the appropriate services and activities; and
4. the duration of the memorandum and the procedures for amending the memorandum during the term of the memorandum; and
5. other provisions, consistent with the requirements of this title, as the parties to the agreement determine to be appropriate and could include:
  - a. requires all signatories strive to meet the service standards
  - b. requires all signatories to participate in center management
  - c. defines roles and responsibilities or signatory agency staff within the center
  - d. center marketing requirements

### **Standards of Service**

The Job Center Service Standards define expectations for serving customers within Job Centers across the State of Wisconsin. The standards will also continue the focus on quality service and ensure consistency of service across the state. The Workforce Development Board is responsible for ensuring that their comprehensive center(s) and any supplementary centers other service locations meet Service Standards.

The Service Standards are broadly stated to allow flexibility in regional program design and local implementation of services. The Service Standards state "what" is to be done; it is up to local groups responsible for the planning and implementation of Job Center services to decide "how" local activities will meet the Service Standards.

The standards are crafted around two customer groupings; Administrative/Partner, and Employers and Job Seekers.

### Administrative/Partner Expectations:

1. The Job Center has a *Memorandum of Understanding* (MOU) with all partners that clearly delineates roles and responsibilities in the service delivery system.
2. The Job Center meets ADA physical and program accessibility requirements. Provide equal access to all services and programs (including resource room materials and services) for all customers, including persons with disabilities and limited English-speaking ability.
3. Veterans and qualified spouses shall be given priority over non-veterans in the receipt of any employment, training, and placement services provided in Wisconsin Job Centers. (TEGL # 5-03, 9-6-2004) vpl1-07 3-19-07
4. The Resource Room/customer service area of the Center is staffed all hours the Center is open. One person who can triage customer needs and refer to programs as appropriate must be on duty at all times the center is open.
5. Staff at the Job Center will provide access to all other required WIA partner programs
6. Staff at the Job Center will provide information about available job training and make referrals as needed
7. The Job Center has a credentialed employment counselor who works with all job seeker customers and is on-site each week.
8. The Job Center addresses the needs of youthful job seekers

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9. The Job Center is participating in a continuous improvement program. Job Center effectiveness in providing services to job seekers and employers will be available to the public.
10. The continuous improvement program must ensure a trained, competent staff and that staff participates in a credentialing program. Staffs providing services through Job Centers are trained and demonstrate competence in providing consistent, high quality service to business and job seeker customers. Staff possess the following knowledge.
  - a. Knowledge of available community resources.
  - b. Knowledge of referral process to all partner programs and services as appropriate for the customer's needs.
  - c. Knowledge and assistance with all Job Center tools, technologies, Internet, and computer systems.
  - d. Knowledge and assistance with special needs and overcoming barriers to employment, as needed. Understands special employment needs of diverse populations.
  - e. Knowledge of privacy and confidentiality requirements for all customers.
  - f. Knowledge of customer service techniques including maintaining a professional relationship.
11. The Job Center has exterior signage using the "Job Center of Wisconsin, Connecting Wisconsin's Workforce Here" logo. Interior signage ensures that all customers are able to use the Job Center effectively and includes, required posters, room locations and directions in English and alternate language(s) as appropriate to customer demographics. [NOTE: Decals will be provided by DET that will suffice for compliance].
12. Services are coordinated across programs and not duplicated, to improve efficiency and service to the customer.
13. Customers receive services through the Job Center system regardless of race, gender, ethnicity, age, or disability status and in accordance with any other legal protections.
14. Privacy and confidentiality is provided for all customers.
15. All customers are served in a timely manner. (Each Workforce Development Board will decide what it considers a timely manner for customer service.)
16. The Job Center has a Business Services Team that will provide business services in an integrated non-duplicative manner and is consistent with the regional *Business Services Plan*

Employer and Job Seeker Expectations: Every customer using the Job Center should expect:

1. Access to [JobCenterofWisconsin.com](http://JobCenterofWisconsin.com) to make connections between job seekers and employers
2. The level of service provided will be appropriate to individual customer's needs and consistent with program requirements.
3. Regularly scheduled financial literacy education and assistance, information about and referral to credit rehabilitation counseling
4. Veterans and qualified spouses shall be given priority over non-veterans in the receipt of any employment, training, and placement services provided in Wisconsin Job Centers. (TEGL # 5-03, 9-6-2004) vpl1-07 3-19-07
5. Access to all other required WIA partner programs
6. Information about available job training and receive referrals as needed
7. Access to an employment counselor who works with all job seeker customers and is on-site each week.
8. To make informed choices, within available services, and be assisted in determining service options.
9. Services are coordinated across programs and not duplicated, to improve efficiency and service to the customer.
10. Program information is accessible in various delivery formats to ensure understanding by the customer, e.g., oral/written translation services, interpreter services/sign language, etc.
11. Accommodations are made for customers' special needs (physical and programmatic).
12. Customers receive services through the Job Center system regardless of race, gender, ethnicity, age, or disability status and in accordance with any other legal protections.
13. Privacy and confidentiality is provided for all customers.

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14. Staff providing services through Job Centers are trained and demonstrate competence in providing consistent, high quality service to business and job seeker customers
15. All customers are treated with respect and served in a timely manner.
16. Information on education, employment and training services.
17. Information on local services, potential eligibility requirements, and how and where to access those services.
18. Information about support services needed to maintain employment.
19. Initial, comprehensive and specialized assessments as appropriate to the customers' needs and program requirements.
20. Career planning with an emphasis on jobs in the area that provide family-supporting wages and benefits, including nontraditional occupations.
21. Current job openings, the qualifications associated with these openings, and application.
22. Assistance with job search, including resume writing, interviewing, seeking nontraditional employment positions, using labor market information and locating the "hidden job market," career ladders, and high wage, high demand occupations.
23. Information on the Unemployment Insurance (UI) filing and claims update processes.
24. Financial literacy training such as the wise use of credit and financial asset building, and credit rehabilitation counseling.
25. Be greeted by some one who can determine my needs and refer me to programs, as appropriate.

**Attachment M**

**Limited English Proficiency Agreement**

**The Department of Workforce Development  
Division of Employment & Training  
Limited English Proficiency Plan  
July, 2008**

**Introduction and Purpose:** The Division of Employment and Training (DET) Limited English Proficiency (LEP) Plan provides a vehicle for DET to communicate the standards maintained in assuring services to LEP individuals. The plan supports the Department of Workforce Development (DWD) LEP policy and addresses the following:

- I. Laws, Orders, Regulations and Department Policy
- II. Responsibility for the DET LEP Plan
- III. Oversight Requirements
- IV. DET Customer Groups and Language Profiles
- V. DET Activities Supporting LEP
- VI. Civil Rights and LEP Complaint Investigation and Processing
- VII. DET LEP Plan Dissemination, Revisions and Effective Dates

The plan also provides an overview of DET management of CRC overall, including the requirements of Equal Opportunity (EO), Affirmative Action (AA) and LEP.

**I. Laws, Regulations and Department Policy:**

**A. Civil Rights Act/Executive Order:** DET is required to follow federal statutes/orders and regulations relating to LEP.

- **Title VI of the Civil Rights Act of 1964** states that No Person in the U.S. shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. <http://www.dol.gov/oasam/regs/statutes/titlevi.htm>
- **Title VII of Civil Rights Act of 1964** prohibits employment discrimination based on race, color, religion, sex and national origin. <http://www.dol.gov/oasam/programs/crc/2000e-16.htm>
- **U.S. Presidential Executive Order 13166** was issued in order to improve access to federally conducted and federally assisted programs and activities for DET persons who, as a result of national origin, are limited in their English proficiency (LEP). <http://www.usdoj.gov/crt/cor/Pubs/eolep.htm>
- **Code of Federal Regulations (CFR)** include CFR, Part 37.35 and 45 CFR, Part 80.3.

**B. Department LEP Policy:** It is the policy of DWD to provide meaningful access to, and information about, all programs and services made available by the Department, to any individual in need of and qualifying for department programs and services at no cost to the customer. The Department will ensure access to services or programs to LEP individuals by providing program information in alternate languages and formats, which may include, but may not be limited to providing interpreters or translation, as necessary.

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Each DWD division is responsible for creating LEP procedures based on this policy that reflect its specific programs, services and customers. This document outlines how the DET will meet the requirements of department policy and applicable Civil Rights legislation.

The complete DWD LEP Policy was last updated October 17, 2006 can be found at <http://dwdworkweb/dwdpolicy/417.htm>.

**II. Responsibility for the DET LEP Plan:** The DET Bureau of Program Management & IT Coordination (BPMITC) has been designated by the Division Administrator as the lead bureau with primary responsibility for developing and implementing the LEP Plan for DET. The lead staff are:

**DET LEP Coordinator:**

Carolyn Gormican, Equal Opportunity Program Specialist  
 Bureau of Program Management & IT Coordination  
 Telephone: 608-267-2474.

She is the AA Officer, LEP Coordinator and Complaint Officer for DET Staff, and oversees DET compliance of EO, AA and LEP requirements.

**DET Back-Up LEP Coordinator:**

Bill Franks, Equal Opportunity Specialist  
 Bureau of Program Management & IT Coordination  
 Telephone: 608-266-6889 or TTY 866-275-1165.

He is the Equal Opportunity and Complaint Officer for DET Programs, and oversees CRC by DET Grant Recipient Agencies, including, EO, AA and LEP Compliance.

All bureaus within DET have a responsibility to contribute in the development and implementation of language access services and procedures and to assure compliance with the LEP Plan.

The organizational structure of DET and information on the service/program areas that DET administers can be found at the DET site: <http://dwd.wisconsin.gov/det/division.htm>. The following provides a list of contacts:

	Telephone Number	Name	Title
Administrator's Office	608-266-6824 608-266-3623	Ron Danowski James Bond	Division Administrator Deputy
Apprenticeship Standards Bureau	608-266-3133	Karen Morgan	Bureau Director
Program Mgmt & IT Coordination Bureau	608-266-6721	Joan E. Larson	Bureau Director
Job Service Bureau	608-267-7514	Brian Solomon	Bureau Director
Migrant, Refugee & Labor Services Bureau	608-266-0002	Juan López	Bureau Director
Workforce Training Bureau	608-267-9704	Gary Denis	Bureau Director

**III. Oversight Requirements:** Federal and State laws and program regulations that guide DET programs provide the legal requirements for CRC, including requirements for equal opportunity, affirmative action, and services to LEP individuals and persons with disabilities. The following are the federal and state agencies that guide DET-administered programs:

Federal Agencies	Key DET-Administered Programs
The U.S. Department of Health and Human Services	Refugee Services under the Refugee Act, PL 97 – 363 and PL 99 – 605, and Refugee Resettlement Programs, 45 CFR 400.1
The U.S. Department of Labor	Youth, Adult, Veterans and Dislocated Worker programs under the Workforce Investment Act and public employment services under

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	Wagner-Peyser funds, PL105 – 220, Part 663 and 664 as well as the Trade Act, PL 107 – 210; and Foreign Labor Services, 20 CFR. Part 656.
<b>State Agencies</b>	<b>Key DET-Administered Programs</b>
The State of Wisconsin, DWD	Migrants Services, ss. Chapter 17. DWD Code 301; Adult Apprenticeship Program, ss. Chapter 106, Code DWD 295 and 296; and Youth Apprenticeship Program, ss Chapter 106, Code DWD 270.

**Federal Oversight of Requirements:** DET develops and updates the State’s Methods of Administration (MOA) for the Workforce Investment Act (WIA) programs funded by the U.S. Department of Labor. The regulations that implement the nondiscrimination and equal opportunity provisions of WIA require that each Governor establish and adhere to a MOA for his/her State programs. The MOA describes the actions an individual State will take to ensure its WIA Title I financially assisted programs, activities, and recipients are complying, and will continue to comply, with the nondiscrimination and equal opportunity requirements of WIA and its implementing regulations. Compliance with the DET LEP Plan is included in the MOA. The CFRs that outline the obligations for developing and maintaining methods of administration are 29 CFR part 37.54 located at [http://www.dol.gov/dol/allcfr/Title\\_29/Part\\_37.54.htm](http://www.dol.gov/dol/allcfr/Title_29/Part_37.54.htm).

DET administers the Refugee Act and Refugee Resettlement programs adhering to the requirements of the U.S. Department of Health and Human Services. CRC requirements for these programs are similar to that of WIA, although no MOA is required for the refugee programs.

**State Oversight of Requirements:** State agency requirements for CRC are administered by the Department of Administration in accordance with ss. Chapter 16.765 for contracts; ss. Chapter 111.31-111.395 for fair employment; and Chapter 230 for personnel.

**IV. Identifying DET Customer Groups and Language Profiles:** The Division used U.S. Census 2000 data for Wisconsin as a starting point for the identification of populations that may have limited English proficiency. In addition, the Department of Public Instruction (DPI) collects data on students and their ability to understand English and extrapolations are made concerning parents of school age children. In Wisconsin as a whole, Spanish and Hmong languages have been identified as having a significant LEP population statewide. In addition, some individual counties can have significant minority populations with other language needs (e.g., Russian, Bosnian, Serbian, Croatian, Somali, etc.). The following link is a starting place for obtaining data on LEP persons <http://www.doa.state.wi.us/dir/wisconsin/index.html>. Data are from the United States Census Bureau Profiles. The best source of “official” Census data used to determine thresholds is the Demographic Profiles (DP) # 2 specifically, the “Language Spoken at Home – Language other than English, Speak English Less than Very Well data set.” Contact Bill Franks for assistance on further demographic information on LEP persons.

**V. DET Activities Supporting LEP:** DET provides an array of activities and initiatives to support the commitment of service to LEP individuals. These are provided as follows:

**A. DET Ad Hoc Civil Rights Committee:** The CRC Committee is an ad hoc committee that is an advisory group made up of representatives from DET Bureaus to help address Civil Rights issues of compliance for DET’s federal financial assistance programs (e.g. AA, EO and LEP) regulations and requirements. Committee members represent DET’s bureaus and bring a variety of experiences and perspectives to the workgroup. Representatives include:

- Bill Franks, DET EO and Compliant Officer for Programs -- Lead
- Isabel Molina-Jefferson, Employment Services and Migrant Labor
- Irina Zelenskaya, Refugee Services
- Glenn Olsen – Services to Persons with Disabilities

Francisco Rodriguez – Migrant Labor Services  
Carolyn Gormican, DET AA/EO Officer and LEP Coordinator

**B. Language Translation and Interpretation:**

- 1. Vital Documents:** Vital documents are those DET documents, paper or electronic, which contain critical information to customers about accessing, adjusting or eliminating DET services or benefits or is a DET document required by law.

Under the “Safe Harbor” guidance, all recipients of federal and/or state funds are required to provide written translations, free of cost to the customer for all documents identified as Vital. The following actions will be considered strong evidence of compliance with the written translation obligations:

- Written translations of Vital Documents are provided for each eligible LEP language group that constitutes five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.
- If there are fewer than 50 persons in a language group that reaches the five percent trigger in, the recipient is not required to translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials free of cost.

“Safe Harbor” was referenced in the Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting LEP Persons.

- a. Identifying Documents for Translation:** Federal funding recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. In determining what documents should be translated, the following four factors should be assessed:

- The number or proportion of LEP persons served or encountered in the eligible service population;
- The frequency with which LEP individuals come in contact with the program;
- The nature and importance of the program, activity, or service provided by the recipient; and
- The resources available to the recipient and costs.

After applying the above four-factor analysis, a funding recipient may determine translation is an effective LEP plan. The list below will also assist in determining whether a document is a vital document or not. If the answer to any of the following is yes, the document should be translated:

- The form/document must be completed and signed by a customer.  
Examples include
  - Applications to participate or receive services or benefits.
  - Written tests for competency for a particular license, job, or skill for which English language proficiency is not required.
  - Consent or complaint forms.
- The publication contains information the customer is required to know.

Examples include

- List of partners at One Stop Centers and services provided.
  - Other outreach materials.
  - ❑ The publication contains the customer's rights and responsibilities when receiving services or benefits.  
Examples include:
    - Notices advising LEP persons of the availability of free language assistance.
    - Information on the right to file complaints of discrimination.
  - ❑ The form/publication/document contains rules, regulations, or laws that must be followed by the customer in order to receive services or benefits.  
Examples include:
    - State wage and hour and safety and health enforcement and information materials.
    - Letters containing important information regarding participation in a program or activity.
    - Information on the provision of services to individuals with disabilities.
  - ❑ The document informs the customer of eligibility, any change in services or benefits, or of something that is happening with their case/program participation.  
Examples include:
    - Notices pertaining to the reduction, denial or termination of services or benefits and of the right to appeal such actions.
  - ❑ The document requires a response from the customer.  
Examples include:
    - Notices that require a response from beneficiaries.
  - ❑ The document contains medical discharge information.
- b. DET Requirements:** Specific DET requirements regarding the translation of Vital documents include the following:
- All of DET's Vital Documents must be translated into Spanish and Hmong at a minimum because these groups meet the threshold for translation in Wisconsin. Other languages that meet this threshold will depend on the service.
  - DET is responsible for the costs related to translation of Vital Documents that are issued by DET.
  - When a Vital Document is developed, DET requires that translation will occur within 30 calendar days of issuance of the English version.
- c. Inventory of Vital Documents:** The DET LEP Coordinator is responsible for updating the DET Inventory of Vital Documents on a periodic basis.
- 2. Non-Vital Documents:** Non-Vital documents, if needed, can be provided orally. Written translation may be provided at the discretion of the program operator/sub grantee.
- 3. Computer Notices and LEP Information Posting:** DET does not currently use computer generated forms for notification.
- 4. Contracted Telephone Interpretation:** DWD currently has a contract with Certified Languages International (CLI) to provide oral translation in the language of the caller to English via telephone <http://vendornet.state.wi.us/vendornet/asp/ContractDetail.asp?SystemContractNumber=1762>.

5. **Contracted Written Translation Services:** DWD obtains written translation of documents through various vendors under contract with the Department of Health and Family Services. Below is the web link for vendors currently under contract.  
<http://vendornet.state.wi.us/vendornet/asp/ContractDetail.asp?SystemContractNumber=1922>.
6. **Oral Interpretation for Customers:** Customers with LEP will receive timely oral interpretation at no cost to them. If there are fewer than 50 persons in a language group that reaches the five percent trigger in, the recipient is not required to translate vital written materials but must provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials free of cost.
7. **Use of Family/Friends and Minors as Oral Interpreters:** DET requires that minor children cannot be used as interpreters. Adult family or friends of the customer may serve as interpreters only after the following:
  - DET informs the LEP customer of the right to free interpreter services;
  - The Customer declines such services in writing and requests the use of a family member or friend; and
  - DET determines the use of such a person would not compromise the effectiveness of services or violate the confidentiality of the LEP customer.

When using a family member/friend, agencies/providers should:

  - Document the use of a family member/friend and place the documentation in the LEP person's file; and
  - Have a trained interpreter sit in on the encounter when possible to ensure accurate interpretation.
8. **Bilingual DWD Staff:** DET continues to assess vacancies to determine the need for positions to possess bilingual skills. To better serve LEP customers, the Division will target positions in parts of Wisconsin where the concentration of Spanish and Hmong target populations indicate the most need for bilingual staff. The Division will implement these changes with current or projected funding resources. The Division will identify Spanish and Hmong populations to be served and determine by location where bilingual staff resources need to be allocated.
9. **DET Interactive Voice Response (IVR) System:** DET provides program information about DET programs and services to customers by phone through an interactive voice response system. The IVR is on the main DET telephone number (608) 266-0327. The introduction is in English, Spanish and Hmong. Further assistance to Spanish and Hmong customers would be provided via CLI.
10. **Walk-Ins:** When an LEP customer walks-in, DET staff should ask the customer to point to the language that he/she speaks, using either the "I Speak Card" available at <http://dhfs.wisconsin.gov/civilrights/ISPEAKCARDS.pdf> or "Language Interpreter Identification Card, provided by CLI, 1-800-362-2341. Office Associates and main reception areas of DET offices should have a supply of the "I Speak Card."

**11. Special Assistance:**

**Wisconsin Coalition for Linguistic Access to Health Care:** DWD maintains representation in the Wisconsin Coalition for Linguistic Access to Health Care. In order for workers to participate in the employment opportunities of the state, they must be able to address health care issues. Efforts to create a certification program for qualified language interpreters for medical situations may contribute to the broader availability of trained language interpreters who are culturally and linguistically competent.

**C. Requirements of Service Deliverers:**

1. **Grantee Agency Requirements:** Many DET program services are delivered through grants with local agencies rather than directly by the Division. Requirements for compliance with EO, AA and LEP laws and regulations are written into the grant agreements.

DET funding recipients of the U.S. Department of Labor are required to comply with the MOA.

DET required funding recipients of the U.S. Department of Health and Human Services to submit a CRC Plan or appropriate Letter of Assurance for the period January 1, 2006 – December 31, 2009. See Admin Memo 06-18 at <http://dwd.wisconsin.gov/det/adminmemos/06018.htm>. The DET LEP Plan's major elements are incorporated into the DET CRC Plan requirements at [http://dwd.wisconsin.gov/det/civil\\_rights/plans\\_instructions.htm](http://dwd.wisconsin.gov/det/civil_rights/plans_instructions.htm).

2. **DET Monitoring Responsibilities:** The DET EO Officer for programs is primarily responsible for desk and on-site monitoring reviews of grantee agencies for compliance with CRC, including EO, AA, and LEP requirements and in the resolution of complaints. In addition, DET grant managers also perform monitoring functions. The information is shared among the DET grant managers and civil rights unit to be sure that compliance concerns are addressed timely and appropriately. The CRC Monitoring Plan is reviewed and updated annually along with the monitoring format and schedule.

**D. Technical Assistance and Training:**

1. **DWD/DET Civil Rights and LEP Websites:** Websites on Civil Rights Compliance and have been created to assist DET customers, grantees and partner agencies as well as DET staff. A direct link to grant CRC requirements plus LEP population demographic data for Wisconsin counties and LEP guidance can be found at [http://dwd.wisconsin.gov/det/civil\\_rights/plans\\_instructions.htm](http://dwd.wisconsin.gov/det/civil_rights/plans_instructions.htm).

A separate LEP information site can be found at [http://dwd.wisconsin.gov/det/civil\\_rights/lep\\_policy.htm](http://dwd.wisconsin.gov/det/civil_rights/lep_policy.htm).

In addition, a DWD Spanish language information site is being developed to assist that major Wisconsin language group in locating department and division information services. The draft homepage of this site can be found at <http://dwdintaccpub/espanol>.

2. **Interpreter Training:** The DET Bureau of Migrant, Refugee and Labor Service (BMRLS) is supportive of non-language specific interpreter training called "Bridging Cultural and Linguistic Barriers," which is provided by the International Institute of Wisconsin. This is an intensive 10-hour seminar that provides interpreters an overview of the fundamentals of interpreting and the background to continue working and improving as a

professional interpreter. This training is divided into three parts: Fundamentals of Interpretation, Interpretation in Health Care, and Interpretation in the Courtroom.

- 3. Training and Technical Assistance for Grant Agencies:** All grant recipient and subrecipient agencies of DET are required to have their staff participate in a yearly training related to CRC, including EO, AA, LEP, services to persons with disabilities, access to services and other programs to enhance sensitivity. DET annually develops a training plan for the provision of training to grantee agency staff by DET.

Currently available via webcast is the session, "CRC in Service Delivery" for grantee Agency Heads, AA Officers, EO and LEP Coordinators and Complaint Officers/Coordinators. This session was jointly developed and presented by DET and the Department of Health and Family Services. The course covers the roles and responsibilities of the agency's CRC lead staff, a review of the complaint process as well as the application of Civil Rights law by utilizing actual complaint case studies.

In the future, DET will rely on electronic capacities such as web cast and other means to provide training and technical assistance to grantees in order to reduce travel costs.

- 4. DET Staff Training:** Division staff are encouraged to attend civil rights EO, AA, LEP and related training on a regular basis as approved by their supervisor. DET annually develops a training plan for the provision of training to DET employees.

To minimize cost and to provide flexible scheduling for division staff, training and technical assistance is provided in a number of different formats, including: in person, electronically issued document materials, communications and information; teleconference, videoconference, web casts and distance learning programs via computer.

Most recently, an "Employee Handbook on Language Interpretation and Translation Services" was developed and issued to DET staff. The Handbook provides assistance to staff on how to respond to telephone or in-person inquiries from individuals who are not proficient in English.

## **VI. Civil Rights and LEP Complaint Investigation and Processing:**

***Program and Customer Complaints:*** *The Equal Opportunity Officer for DET Program Services is Bill Franks. He is the complaint coordinator for civil rights and discrimination complaints regarding language access from applicants or recipients of DET program services. In addition, he oversees the Wisconsin Job Center Complaint Coordinator system.*

Wisconsin has a Job Center Complaint Coordinator system for customer complaints in the Job Centers throughout the State. On 02/13/2008, DET issued Admin Memo 08-01, Job Center Complaint Coordinator System, available at <http://dwd.wisconsin.gov/det/adminmemos/08001.htm> which updated procedures and requirements on Wisconsin's Job Center Complaint Coordinator System, including a current list of Complaint Coordinators (CC). This list will be continually updated as information is made available to DET. The CC serves as a centralized point for anyone visiting or working at the Job Center to go to with any kind of complaint. Complaints could range from serious harassment to potholes in the parking lot. The CC will listen to the complaint and refer the complaint to the proper resource/partner agency for resolving the complaint. The CC's will not be expected to do anything beyond referral; they will not be the person who resolves the complaint. Many complaints need to follow existing formal complaint/appeal procedures. The CC is the conduit to make sure the complainant gets to the

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resource/agency to resolve the complaint based on the type of complaint or the particular program involved.

Information and procedures on filing program or customer complaints of discrimination are available at the following:

- **Workforce Programs Guide:** Part 1- Administration of Workforce Programs, Section III, Item S - Complaints /Grievances and Appeals located at DET Website:  
[http://dwd.wisconsin.gov/dwdwia/workforce\\_guide/part1/part1\\_adm.pdf](http://dwd.wisconsin.gov/dwdwia/workforce_guide/part1/part1_adm.pdf).
- **CRC Plans 2007 – 2009:** Attachment 3, “How to file an employment or service delivery discrimination complaint.” [http://dwd.wisconsin.gov/det/civil\\_rights/plans.instructions.htm](http://dwd.wisconsin.gov/det/civil_rights/plans.instructions.htm).

**DET Employee Complaints:** Carolyn Gormican is the DET Complaint Coordinator for staff complaints. She serves as the DET Affirmative Action Officer and LEP Coordinator and addresses all manner of DET employee complaints, including complaints of discriminations. Ms. Gormican is also the DET Labor Liaison and addresses union grievances for the Division Administrator.

- VII. **DET LEP Plan Dissemination, Revisions and Effective Dates:** This plan is shared with the DET Management Team and responsibilities and expectations are discussed. In addition, it is posted on the DET LEP web site in Section V.D.1 of this document. All division staff are notified and encouraged to review the plan. A copy of the plan is also provided to federal funding agencies as appropriate.

This plan will be reviewed annually for needed revisions. The plan will remain in effect until modified by a new effective date.

**Attachment N**

**Wisconsin**

**Final Negotiated Program Year 2010 - 11 Goals for  
Workforce Investment Act Common Measures for  
Adult, Youth, Dislocated Worker and Employment Service**

<b>Performance Measures</b>	<b>Final Negotiated PY 09 Goals</b>
<b>Adult</b>	
Adult Entered Employment	72
Adult Retention	84
Adult Average Earnings	\$9,800
<b>Dislocated Worker (DW)</b>	
DW Entered Employment	84
DW Retention	93
DW Average Earnings	\$14,400
<b>Youth</b>	
Youth Placement in Employment or Education	72
Youth Attainment of a Degree or Certificate	75
Literacy and Numeracy Gains	30
<b>Employment Service (ES)</b>	
ES Entered Employment	61
ES Retention	84
ES Average Earnings	\$12,500

## Attachment O

### Public Comments and Responses to State Plan Modification Spring 2010

The following are the two public comments received during the 30-day public review and comment period along with DWD's response.

Mr. James Haney, President, Wisconsin Manufacturers and Commerce; Member, Council on Workforce Investment and Co-Chair of the Dislocated Worker Subcommittee:

"Anything in this that is controversial? I started to read through it and find it way too complicated to follow! Who will be unhappy with the modifications? Does it shift resources from someplace to someplace else? Does it have any strange impact on the Dislocated Worker Program?"

DWD response: Basically, the modification does three things:

1. It responds to questions that DOL had about how we were implementing waivers. We had to revise what we originally requested for DOL approval. The Division Administrator has given report outs about that at Council meetings.
2. We formally acknowledge our performance standards that have been negotiated with DOL.
3. We are publishing the Allocation Process. This has not been done in any detail since the original formula development for the Dislocated Worker program in the Job Training Partnership Act, around 1990. We have not changed any variables although we have updated data sets used or have documented which data we are using. For example: Originally we measured employment decline by industry by WDA comparing last year's employment against employment in 1982. Several years ago we moved from SIC to NAICS. When we did that, we decided to compare current employment to employment five years before. It has not had a major impact but we thought we should update the description to reflect reality. The allocation guide also serves as a "cook book" for the person who has to do them.

Mr. Michael Greco, Director of the Bureau of Consumer Services, Division of Vocational Rehabilitation:

"On behalf of the Division of Vocational Rehabilitation, we support the following two changes as outlined in the Wisconsin's Workforce Investment Act State Plan Modification since it is expected that these changes may open up additional training and employment opportunities for individuals:

- This is available for all WDBs if they want to have the ability to increase the employer reimbursement for on-the-job training with a specified sliding scale based on company size along with other prescriptive guidance, WIA Section 101(31)(B)
- This is available for all WDBs if they want to have the ability to reduce the 50% employer match for customized training with a specified sliding scale based on company size along with other prescriptive guidance, WIA Section 101(8)(C)
- Thanks!"

**ATTACHMENT P**

**ALLOCATION GUIDE**

**Wisconsin WIA Allocation Process: The Operational Guide, Protocols and Checklist to  
Develop the Annual Allocations for Workforce Development Areas**

# WISCONSIN WIA ALLOCATION PROCESS

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**The Operational Guide, Protocols & Checklist  
to Develop the Annual Allocations for  
Workforce Development Areas**

Version 1-H

Prepared by: Gary Denis,  
Bureau of Workforce Training

November 2009  
rev. March 2010

## **WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

It is the intention that this document, along with the Allocation Template, will help the reader understand how WIA allocations are developed for Wisconsin Workforce Development Areas. We believe that this guide will make the process more transparent.

The document contains instructions for each step of the allocation process, protocols for allocation development and a checklist to ensure that each step is completed in a timely fashion. This guide will be the operating instruction for the staff that develop the allocations.

It is also important to note that this document is an ongoing work. After each allocation cycle, we will review the effort and improve the process. This guide will be revised to reflect those improvements.

The guide and the allocation process meet the Department of Labor requirements in place at the time of publication. The guide will also be revised to reflect changes to the allocation process that must be implemented in response to changes in federal requirements.

## Introduction

The workforce development activities carried out in Wisconsin's eleven Workforce Development Areas (WDA) are federally funded through the Workforce Investment Act (WIA). WIA funds are distributed to states based on three factors described in Sections 127 and 132 of the Act. Funds provided through this process are considered allotments, are announced through a Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) usually in March, and are provided for Youth, Adult, and Dislocated Worker programs.

Definitions used in the preparation of allocations:

Allocations Developer: The developer is a DWD staff person who is responsible for collecting data from various sources, inputting the data into the allocations spreadsheet, adjusting the spreadsheet and calculating the allocation shares and subsequent allocations.

Allocations Share: The percent of the funds that a WDA should expect to receive from the funds available for local distribution for that program in the State based on the funding formula or hold harmless provisions.

Allocations Team: A small group of workforce professionals from DWD and the WDBs who will review the allocation methodology and allocation results prior to the release of the WIA Allocations for each program year.

ASU: Area of Substantial Unemployment – Number of unemployed persons residing in a county or reportable city that has at least one census tract or a combination of contiguous census tracts with a population of 10,000 and an unemployment rate of 6.5%. This data is from the prior program year (July to June)

Data Source Contacts: The key staff to communicate with at agencies that produce data used in the allocation formulae. (Attachment D contains a listing of contacts)

Declining Industries: Industry sectors (2-digit North American Industrial Classification System (NAICS) code.) that have fewer jobs than the sector had in a criterion year. For PY10 allocations, PY08 number of jobs will be compared to PY03 number of jobs.

Economically disadvantaged adults: individuals age 22-72 meeting (or member of family meeting): OMB poverty level or 70% of Lower Living Standard Income Level (LLSIL), excluding college students and military as counted in the census. (Concentrated Employment Program areas have a special adjusted LLSIL). The 2000 census data transmitted to states in October 2006 are used.

Economically disadvantaged youth: individuals age 16-21 meeting (or member of family meeting): OMB poverty level or 70% of LLSIL, excluding college students and military as counted in the census. (Concentrated Employment Program areas have a special adjusted LLSIL). The 2000 census data transmitted to states in October 2006 are used.

Excess unemployed: The number of unemployed individuals above a 4.5% unemployment rate residing in a WDA. This data is from the prior program year (July to June)

Insured Unemployment: total number of UI Claimants for most recently completed calendar year.

Internal Review Team: A small group of DWD staff who will review the allocation spreadsheets, DOL allotment announcements and related policies to ensure that allocation shares calculation is correct prior to release to the Allocation Team for review and comment.

Long-term unemployed: UI Claimants that received unemployment compensation for 15 or more weeks in the most recently completed calendar year.

Lower Living Standard Income Level (LLSIL): WIA Section 101(24) defines the LLSIL as "that income level (adjusted for regional, metropolitan, urban and rural differences and family size) determined annually by the Secretary [of Labor] based on the most recent lower living family budget issued by the Secretary."

OMB Poverty Level: Following the Office of Management and Budget's (OMB's) Directive 14, the Census Bureau uses a set of money income thresholds that vary by family size and composition to detect who is poor. If a family's total income is less than that family's threshold, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation with the Consumer Price Index (CPI-U). The official poverty definition counts money income before taxes and excludes capital gains and noncash benefits (such as public housing, Medicaid, and food stamps).

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Unemployment concentrations: The WDA must meet or exceed the state unemployment rate or have 10% or more of all unemployed workers in the state in order to qualify for this factor. This data is from the prior program year (July to June)

Factors Used in the Calculating WIA Allocations:

Once the allotment is received, Division of Employment and Training staff prepares within state allocations.

Youth Formula:

For the youth programs, the same factors used to determine Federal allotments are used to distribute funds among the WDAs. The three factors are

1. **33 1/3% on the basis of the relative number of unemployed individuals in ASUs in each workforce investment area, compared to the total number of unemployed individuals in ASUs in the State;**
2. 33 1/3% on the basis of the relative number of Excess Unemployed individuals in each workforce investment area, compared to the total number of Excess Unemployed individuals in the State; and
3. **33 1/3% on the basis of the relative number of disadvantaged youth in each workforce investment area, compared to the total number of disadvantaged youth in the State. [WIA sec. 128(b)(2)(A)(i)] See Attachment A.**

To reduce some of the volatility of the formula factors on WDAs, a hold harmless provision is applied to the results of the three-factor formula. The Act provides that a WDA shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the WDA for the 2 preceding fiscal years. Regulatory reference to hold harmless is contained in Attachment C.

Adult Formula:

For the adult programs, the same factors used to determine Federal allotments are used to distribute funds among the WDAs. The three factors are

1. **33 1/3% on the basis of the relative number of unemployed individuals in ASUs in each workforce investment area, compared to the total number of unemployed individuals in ASUs in the State;**
2. 33 1/3% on the basis of the relative number of Excess Unemployed individuals in each workforce investment area, compared to the total number of Excess Unemployed individuals in the State; and
3. 33 1/3% on the basis of the relative number of disadvantaged adults in each workforce investment area, compared to the total number of disadvantaged adults in the State. [WIA sec. 133(b)(2)(A)(i)] See Attachment B.

To reduce some of the volatility of the formula factors on WDAs, a hold harmless provision is applied to the results of the three-factor formula. The Act provides that a WDA shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the WDA for the 2 preceding fiscal years. Regulatory reference to hold harmless is contained in Attachment C.

Dislocated Worker (DW) Formula:

The Dislocated Worker within state allocation is calculated based on a formula developed by the Governor and approved in the State's WIA Plan. There are six factors in the WI Dislocated Worker allocation formula. The factors and their associated weights are:

1. **25% based on a WDA's Unemployment Concentration value as a percentage of the entire state's Unemployment Concentration value.**
2. 18.75% based on the relative number of Long Term Unemployed persons living in the WDA as compared to the number of Long Term Unemployed persons in the state.
3. 6.25% based on the relative number of persons living in the WDA who have established an Unemployment claim as compared to that number for the state.

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4. 25% based on Declining Industries where the relative number of jobs lost by industry within the WDA is compared to the number of jobs lost by industry within the state.
5. 12.5% based on the relative number of persons reported as receiving notice of lay off in Plant Closing/Mass Lay off notices in the WDA compared to the total reported for the state.
6. 12.5% based on each WDA's prorated share of Farm Hardship as measured by farm closings.

Although the WIA does not include a Dislocated Worker hold harmless, the Council on Workforce Investment agreed that the hold harmless provided for in the Job Training Partnership Act should continue to be applied in WIA. The provision is described in the WIA State Plan. The hold harmless ensures that each WDA will receive at least 85% of the prior year allocation percentage.

The text of the related legislation is contained in Attachment B.

### Allocation Timetable:

#### January:

- The allocation process should begin in early January of each year. It begins with a written notice via email, memo or letter from the allocation developer to the data source contacts reminding them of the data each will provide. See Attachment D for data source contacts.
- Data sources return the requested data by the end of January.

#### February:

- By mid February, the allocation developer enters all data needed to calculate the allocation shares. Preliminary allocation shares are distributed for internal review.
- End of February: Release, via Administrator's Memo (ADM), preliminary allocation shares to the Workforce Development Boards for review and pre-planning. The Allocations Team will be asked specifically to review the allocation shares and the process used to develop them.

#### March:

- DOL-ETA issues the TEGl that transmits state allotments and related policy. (approximate time, may be issued later but supposed to be out in time for the April 1 start of the Youth program)
- Internal team reviews TEGl to determine if related policy will require adjustments to the allocation spreadsheet.
- If spreadsheet adjustments are required, the allocation developer will complete revisions for review by the Allocations Team within 15 days of receipt of the TEGl. The Allocations Team will have 5 days to review spreadsheet revisions.
- Allocations developer begins working on an ADM to transmit WDA final allocation shares and allocation amounts to the Workforce Development Board Directors and other interested parties. Development of the ADM can begin once allocations related policy impact is understood. The goal is to have the ADM signed by March 31 (dependent on the issue date of the TEGl containing allotments).
- After the Allocations Team approves and returns the allocation spreadsheet the allocations developer enters the allotments into the spreadsheet to calculate WDA allocation amounts.
- Allocation developer routes the completed allocation spreadsheet to the Allocations Team for verification of the allocations. After verification, the Allocations Developer prints the "Print Allocations" tab for attachment to the ADM.
- Allocation developer routes the completed ADM for signature to the Division Administrator through their supervisor and Bureau Director.

#### April:

- The signed ADM is transmitted to the WDBs, DET Contracting, the Bureau of Workforce Training and other interested parties.
- DET Contracting enters the allocation amounts into grant documents for the WDBs and ensures that the information is in CORE.

### Review Teams:

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Internal Review Team: Whenever internal review is needed, the following positions will be consulted.

Director, Bureau of Workforce Training	Finance Section Chief
Local Services Section Chief	DWD Budget Analyst assigned to WIA
Labor Market Information Section Chief	DET Contracting Staff

Allocations Team: The Allocations Team consists of DWD and WDA staff who will review processes and results to ensure accuracy and compliance with the requirements that govern the development of WIA allocations. Members include:

Administrator, Div. of Employment and Training	Labor Market Information Section Chief
Director, Bureau of Workforce Training	DWD Chief Financial Officer
Local Services Section Chief	Directors from two WDBs

**Calculating the Allocations**

The allocation formula is embodied in a 17-tabbed MS-Excel spreadsheet. The spreadsheet has been modified and added to over the years. The last significant revisions were done when WIA was implemented in PY2000 and when the DW programs were integrated into the spreadsheet in PY04.

Although the spreadsheet is usually referred to as the Allocation Formula, there are really two allocation formulas that are calculated in the spreadsheet; the Youth/Adult formula (aka the 3-part formula) and the Dislocated Worker formula, which has 6 parts. Both formulae use some common data so they are done together.

In the chart below is a list of the tabs within the spreadsheet. Each tab is classified by its primary purpose and program it influences. A tab that is classified as a Calculator generally takes data that has been input in another location and processes it to produce a factor for the formula. An Input tab generally is a storage location for data that has been provided by a data source and will be used by a Calculator tab. In some instances, a tab will be both Calculator and Input. The Info/Print tabs contain information of interest or summarize results in a printable format.

Tab Name:	Purpose of the Tab			Program the Tab Applies to:		
	Calculator	Info/Print	Input	Adult	Youth	DW
Reference			X	X	X	X
DOL Allotment	X		X	X	X	X
Print Allocations	X	X		X	X	X
Calc Adult	X			X		
Calc Youth	X				X	
Calc DW	X					X
3-Part	X			X	X	
DW 6-Part	X					X
WARN Data			X			X
UI Claimants	X		X			X
UI Concentrations	X					X
Farm Loss	X		X			X
Industry Decline	X					X
ASU-EU	X			X	X	X

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Calculator						
LAUS Data			X	X	X	X
Decline Data			X			X
Updates		X	X	X	X	X

**Specific Instruction for each Tab**

**Reference TAB:** This tab is a location to enter data that will be referenced throughout the workbook. For example, every year the Program Year must be changed manually on virtually every tab. By referencing a cell on this sheet, all the Program Years can be changed with one entry. Similar mass references are included in this tab.

**DOL Allotment TAB:** This tab calculates the gain/loss from the prior year; calculates the state admin, 10% discretionary fund, special response fund and funds for local distribution; and, provides a history of allotments received from DOL.

The allocation developer has a number of procedures to execute on this sheet. They are:

1. Copy the most current year allotment amounts from column D4-D13 to column C4-C13.
2. Enter new PY allotments from the DOL TEGL into column D4-D13.
3. Copy Column D4-D13 to the first free column to the right of the "History Section."
4. Enter the TEGL number and date as the information source in Cell B15 and at the end of the source list starting in A27.

The Print Allocation Tab references the local distribution amounts in column K5-K7. Allocation shares multiplied by the local distribution amounts generates WDA allocations by program.

**Print Allocations TAB:** The Print Allocations tab calculates and displays each WDA's allocation shares, allocation amount, and its hold harmless status for each program. All the calculations on this tab are automatic. The allocation shares come from the Calc Adult, Calc Youth and Calc DW. Allocations are generated by multiplying the allocation share by the allotment available for local distribution from column K on the DOL Allotment Tab. The source notation comes from the DOL Allotment page as well and the Program Year comes from the Reference Tab.

The only manual task for the Allocations developer is to print the sheet.

**CALC ADULT TAB:** This tab applies the hold harmless provision to the Adult allocation shares calculated on the 3-part tab, maintains a history of prior allocation shares, and exports the allocation shares and the hold harmless designation to the Print Allocations Tab. The tab has three sections.

- Section 1 calculates whether a WDA will be held harmless and adjusts the allocation shares of those WDAs not held harmless down to make up for the hold harmless adjustment. This iterative process may cause some WDAs not initially held harmless to be protected as their share falls to provide the hold harmless to eligible WDAs.

This section compares the allocation shares calculated on the 3-part tab to 90% of the Average of Prior 2 Years Share and chooses the higher of the two shares. If any WDA is held harmless, the sum of the shares will exceed 100%. Each subsequent column checks if each WDA share in the previous column exceeds the hold harmless share and if so, reduces the share in proportion to its contribution to exceeding 100% in the sum of the prior column.

**This process progressively reduces the sum of the column closer to 100%. When the column sum reaches 100.0000%, or there have been 25 recalculations, whichever is later, recalculation can stop.**

- Section 2 is a historical table of allocation shares by WDA from the inception of WIA. The shares from the most recent 2 years prior to the allocation year provide the data for the Average of Prior 2 Years Share in Column C in Section 1.
- Section 3 is used to double check the final adjustment against the 90% hold harmless amount and label the hold harmless WDAs. This section contains all of the exportable data from this sheet for the Print Allocations Tab.

Most of the calculations are automatic in this sheet though there are some maintenance functions that an Allocations developer must perform. They are:

1. In Section 2, ensure that the Allocation Shares for the most recent program year are actual values, not cell references. If they are cell references or formulas, copy the Allocation share column onto itself using Paste Special, Values and Formatting. This will convert the relative references to values.
2. Copy the two most recent Program Year's data from this Section to columns C & D of this Section. Section 1, column C uses this data to calculate the Average of the Prior 2 Years.
3. After the calculations have been run, copy column AE from Section 1 to the appropriate PY blank column in section 2. Use the Paste Special, Values and Number Formatting when copying to ensure that the allocation shares are recorded as values rather than relative reference cells or formulas. (if the sum of column AE in Section 1 is greater than 100.0000%, copy the first column where the total equals 100.0000% to Section 2)
4. After copying to Section 2, enter a comment in the header of the column that tells which column was used from Section 1.
5. If a column of allocation shares other than column AE from Section 1 is used as the calculated allocation shares, the Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used.

**CALC YOUTH TAB:** This tab applies the hold harmless provision to the Youth allocation shares calculated on the 3-part tab, maintains a history of prior allocation shares, and exports the allocation shares and the hold harmless designation to the Print Allocations Tab. The tab has three sections.

- Section 1 calculates whether a WDA will be held harmless and adjusts the allocation shares of those WDAs not held harmless down to make up for the hold harmless adjustment. This iterative process may cause some WDAs not initially held harmless to be protected as their share falls to provide the hold harmless to eligible WDAs.

**This section compares the allocation shares calculated on the 3-part tab to 90% of the Average of Prior 2 Years Share and chooses the higher of the two shares. If any WDA is held harmless, the sum of the shares will exceed 100%. Each subsequent column checks if each WDA share in the previous column exceeds the hold harmless share and if so, reduces the share in proportion to its contribution to exceeding 100% in the sum of the prior column.**

This process progressively reduces the sum of the column closer to 100%. When the column sum reaches 100.0000%, or there have been 25 recalculations, whichever is later, recalculation can stop.

- Section 2 is a historical table of allocation shares by WDA from the inception of WIA. The shares from the most recent 2 years prior to the allocation year provide the data for the Average of Prior 2 Years Share in Column C in Section 1.
- Section 3 is used to double check the final adjustment against the 90% hold harmless amount and label the hold harmless WDAs. This section contains all of the exportable data from this sheet for the Print Allocations Tab.

Most of the calculations are automatic in this sheet though there are some maintenance functions that an Allocations developer must perform. They are:

1. In Section 2, ensure that the Allocation Shares for the most recent program year are actual values, not cell references. If they are cell references or formulas, copy the Allocation share column onto itself using Paste Special, Values and Formatting. This will convert the relative references to values.
2. Copy the two most recent Program Year's data from this Section to columns C & D of this Section. Section 1, column C uses this data to calculate the Average of the Prior 2 Years.
3. After the calculations have been run, copy column AE from Section 1 to the appropriate PY blank column in section 2. Use the Paste Special, Values and Number Formatting when copying to ensure that the allocation shares are recorded as values rather than relative reference cells or formulas. (if the sum of column AE in Section 1 is greater than 100.0000%, copy the first column where the total equals 100.0000% to Section 2)
4. After copying to Section 2, enter a comment in the header of the column that tells which column was used from Section 1.
5. If a column of allocation shares other than column AE from Section 1 is used as the calculated allocation shares, the Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used.

**CALC DW TAB:** This tab applies the hold harmless provision to the Dislocation Worker allocation shares calculated on the DW 6-part tab, maintains a history of prior allocation shares, and exports the allocation shares and the hold harmless designation to the Print Allocations Tab. The tab has three sections.

- Section 1 calculates whether a WDA will be held harmless and adjusts the allocation shares of those WDAs not held harmless down to make up for the hold harmless adjustment. This iterative process may cause some WDAs not initially held harmless to be protected as their share falls to provide the hold harmless to eligible WDAs.

This section compares the allocation shares calculated on the DW 6-part tab to 85% of the Prior Year Share and chooses the higher of the two shares. If any WDA is held harmless, the sum of the shares will exceed 100%. Each subsequent column checks if each WDA share in the previous column exceeds the hold harmless share and if so, reduces the share in proportion to its contribution to exceeding 100% in the sum of the prior column.

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**This process progressively reduces the sum of the column closer to 100%. When the column sum reaches 100.0000%, or there have been 25 recalculations, whichever is later, recalculation can stop.**

- Section 2 is a historical table of allocation shares by WDA from PY04. The shares from the most recent year prior to the allocation year provides the data for the Prior PY Shares in Column C in Section 1.
- Section 3 is used to double check the final adjustment against the 85% hold harmless amount and label the hold harmless WDAs. This section contains all of the exportable data from this sheet for the Print Allocations Tab.

Most of the calculations are automatic in this sheet though there are some maintenance functions that an Allocations developer must perform. They are:

1. In Section 2, ensure that the Allocation Shares for the most recent program year are actual values, not cell references. If they are cell references or formulas, copy the Allocation share column onto itself using Paste Special, Values and Number Formatting. This will convert the relative references or formulas to values.
2. Change the references in Section 1, column C to references the allocation shares from the most recent program year prior to the year allocations are being calculated for.
3. After the calculations have been run, copy column AE from Section 1 to the appropriate PY blank column in section 2. Use the Paste Special, Values and Number Formatting when copying to ensure that the allocation shares are recorded as values rather than relative reference cells or formulas. (if the sum of column AE in Section 1 is greater than 100.0000%, copy the first column where the total equals 100.0000% to Section 2)
4. After copying to Section 2, enter a comment in the header of the column that tells which column was used from Section 1.
5. If a column of allocation shares other than column AE from Section 1 is used as the calculated allocation shares, the Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used. Add a note to the Updates Tab that the reference was changed.

**3-Part TAB:** This tab is used to calculate allocation shares from the 3 factors in the WIA legislation. The 3-part formula is set up to calculate a share that a WDA would receive of the State's allotment if based solely on the factors in the Act. Each factor is 1/3 of the share. The factors are the relative share the WDA's economically disadvantaged adults or youth make up of the State's economically disadvantaged adults or youth, the relative share the WDA makes up of the State's unemployed in excess of 4.5% and the WDA's share of unemployed living in the State's ASUs (above 6.5%). The results of this page are exported to Column E in Section 1 in the Calc Adult and the Calc Youth Tabs where they are compared to the hold harmless levels.

The Allocations developer has very little to do on this sheet. Everything is either calculated by formula within cells from data brought into this tab from ASU-EU Calculator Tab, data imported from ASU-EU Calculator or data hard coded into columns I & J from the 2000 Census.

The data in column I, "Adult Economic Disadvantaged," & J, "Youth Economic Disadvantaged," changes one time per decade and must be updated by hand - based on instructions from the Department of Labor.

**DW 6-Part TAB:** This sheet is used to aggregate the six dislocated worker factors together to generate an allocation share based on economic factors only. Each of the gray columns represents results from other tabs and their weighting factor is listed in the last row of the chart. For each WDA, Column C is the sum of each factor value multiplied by its weighting. The numbers in the non-shaded columns are informational and provide context for the numbers in the shaded columns but are not used in the calculations. The values in Column C are exported to Tab Calc DW, Column E for use in adjusting the allocation shares by Hold harmless. Most of the work on this tab is managed by the spreadsheet itself. The Allocations developer only has to update the date of the Unemployment and WARN Data, the headers on farm loss data and the reference years in the declining industry's header.

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The data for this tab comes from a variety of other tabs. The data from those other tabs are brought to this tab to calculate the DW allocation share before the hold harmless provision is applied

- The Total Paid UC comes from column D of the UI Claimant Tab.
- The % Total UC comes from column C of the UI Claimant Tab.
- The data for the 15 or More Weeks comes from column F of the UI Claimant Tab.
- The % UC Long is imported from column E of the UI Claimant Tab.
- The Number Affected in WARN Notices comes from column E of the WARN Data Tab.
- Percent of Total Affected by WARN Notice is accessed from column F of the WARN Data Tab.
- WDAs where Unemployed concentrations are a factor is imported from the UI Concentrations Tab, column D.
- # of Farm Losses to 2002 is from the Farm Loss Tab, column E.
- % of Farm Loss is gathered from column F of the Farm Loss Tab.
- Employment Decline is copied in from the Industry Decline Tab, column I. The % Decline comes from column J of that same tab.

**WARN Data TAB:** This tab gathers data that addresses the DOL formula requirement to account for Plant Closing-Mass Layoff. WDAs areas receive a prorated share of the total number of persons reported as being laid off from their employment by employers who file a Notice under state & federal plant closing - mass layoff laws. The Dislocated Worker Unit of the BWT supplies this data. The Allocations Developer copies in this data by WDA from the electronic report provided by the DW Unit.

The numbers affected by WARN notices for the most recent calendar year are entered in column E9 through E19. The percent shares are calculated automatically in column F9 to 19. This data automatically exports to the DW 6-Part Tab, columns H & I.

The Allocations Developer then will copy cells E6 through F21 to the next available column in the Historic Information section (Row 45). This area of the spreadsheet is for information only.

**UI Claimant TAB:** The purpose of this tab is to calculate the relative share each WDA will receive of the state's long-term unemployed and number of UI Claimants. The data is provided by the Unemployment Insurance Division in PDF (this may be changeable in the future). The report is UI Report: DWDUIBNP.UI9618.TSOLIB.WIAUIDUR, Table of SDA by WKPD.

- The number of claimants must be entered from the report into cells D7 to D17. Column C calculates the WDA shares of the state total.
- The number of UI recipients that have received payments for more than 15 weeks is entered for each WDA in cells F7 through F17. Column E calculates the WDA shares.
- The number receiving UI for less than 15 weeks is entered by WDA in cells G7 through G17. There is currently no use for this information in any calculations at this time.

**When adding columns F + G, you will not get the number of claimants recorded in column D. Column F + G equals all check recipients. Column D is all check recipients plus those who have started a claim but did not receive a check, for whatever reason.**

The tab exports Columns C, D, E, and F automatically to the DW 6-Part Tab for use in calculating the DW allocation share.

**UI Concentrations TAB:** The purpose of this tab is to determine whether a WDA qualifies as having a concentration of unemployed. The tab calculated the state's average unemployment rate for the prior calendar year, and then calculates the value of 10% of the state's average unemployment for the prior calendar year. If a WDA's unemployment rate (as calculated in column G) exceeds the state rate or if the WDA number of unemployed (column H) exceeds 10% of the state's total unemployment, the WDA qualifies to compete for shares of this factor.

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The WDAs that qualify receive a relative share based on their share of the total unemployment of the qualifying WDAs.

The data used here comes from the file used for the within state allocation that has been submitted to the DOL in accord with instructions in Training and Employment Guidance Letter 04-09 and BLS LAUS Technical Memorandum No. S-09-23. This file is used by the DOL to determine allotments to states.

The Allocations Developer has nothing to manipulate on this page. All data used to determine this factor comes from other tabs or is the result of within tab calculations. No input required.

The tab will export cells C8 through D18 to DW 6-Part cells J7 to K17. This factor makes up 25% of the DW allocation share.

The box that is marked informational in this tab illustrates how each WDA qualifies for the factor. Some WDAs qualify by having more than 10% of the state's total unemployment, some because their rate is higher than the state's unemployment rate and in some cases because they meet both. Incidentally, a WDA does not qualify a larger share by meeting both benchmarks.

**Farm Loss TAB:** This tab calculates each WDA's share of farm hardship experienced in the state. We measure Farm hardship by comparing the number of farms in operation in a reference year compared to the average number of farms in operation in 1982 to 1984. Reference year data is updated every 5 years via the Census of Agriculture – County Data. The 2007 census became available in 2009 and is used for PY2010 calculations.

The Allocations Developer will need to hard code in the number of farms by county in column D34 to D105. Update the headers to refer to the actual years used in the calculation of farm loss. Once the data is entered, the tab will calculate the loss by county and WDA and export the number of farm losses and the WDA share of farm loss to the DW 6-Part tab, columns L & M respectively.

**Industry Decline TAB:** This tab computes the declining industry factor by calculating job losses in declining industry. This tab has two sections. Section A summarizes the employment in declining industry and calculates the WDA's relative share of the state's declining industry employment.

Section B provides the raw data by two digit NAICS and is supplied by QCEW Staff. The most recently available calendar year data is compared to average industry employment data from the calendar year 5 years earlier. (E.g. CY2008 data is compared to CY2003.) Wherever there is job loss from the reference year to the most recent year, that industry loss is added to the WDA total losses in declining industries.

Because some employers do not provide location information, there are employment numbers not assigned to a county. The unassigned employment is distributed to each WDA based on the distribution of employment with known locations.

Instruction for the Allocations Developer follows.

### Section A

- Column E3 – E13 is total distributed employment by WDA gathered from Section B, column H58 – H916.
- Column F3 – F13 calculates the share of total distributed employment attributable to each WDA.
- Column G3 – G13 calculates the share of the unassigned job loss (column I18 - 55 in section B) that should be distributed to each WDA by multiplying the total unassigned job losses (cell I56) by the WDA share of distributed employment (column F3-13).
- Column H3 – H13 sums the distributed employment loss in declining industries by WDA from Section B, column I58 – I916.
- Column I3 – I13 totals each WDA's employment declines by adding columns G & H in Section A together. This brings unassigned job loss and distributed employment loss together for calculating the WDA share of employment loss in declining industries.

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- Column J is the WDA share calculated by dividing the WDA's total employment in declining industry listed in column I by the State's employment in declining industry (cell I14)
- Data in columns I & J move to the DW 6-Part tab in columns N & O.
- Distributed employment in Section B, column G & H is distributed by 2 digit NAICS by county and aggregated to WDA.

### Section B

All of the data for Section B is copied in from the Decline Data tab. When copying to any of the columns in Section B, the copy must be done by WDA and a summation of the WDA's data done at the end of their data.

- Column A19 – A916: copy in the WDA number from the Decline Data tab, column B6
- Column B19 – B916: copy in the County number (labeled as CNT) from the Decline Data tab, column A6
- Column C19 – C916: copy in the NAICS (labeled as NA) from the Decline Data tab, column C6
- Column D19 – D916: Copy in the Industry Titles from the Decline Data tab, column J6 (labeled as Title)
- Column G19 – G916: Copy in the employment numbers from the Decline Data tab, column F6 (labeled as Employ1). This is the employment data for the reference year.
- Column H19 – Copy in the employment numbers from the Decline Data tab, column I6 (labeled as Employ2). This is the employment data for the most recent year.
- Column I19 – I916: This column calculates the number of job losses that have occurred by subtracting industry employment for the most recent year (column H19 – H916) from the industry employment in the reference year (column G19 – G916). If jobs have been lost in the comparison, the number lost will show. If there are job gains or no loss, the cell will appear blank.

There is more cut and paste work on this tab than on any other in the workbook. In addition to the care that must be taken getting the data into this tab, care must also be taken to update column headers to represent the correct year for data comparisons.

**ASU-EU Calculator TAB:** This tab is used to take ASU data (Column O from LAUS Data tab ) and LAUS data (Column N from LAUS Data tab) to calculate the WDA Share of the State's ASU and Excess Unemployment totals. The Allocations Developers role on this tab is checking and validating as all actions are done automatically. The list of counties and their sub parts need to be checked against the list of counties and parts of counties on the LAUS Data tab to ensure exact matches in the 2 lists.

Here is how this tab works.

- Column G calculates the ASU Unemployment Rate for each geographic area listed in column A by dividing column C data by the sum of column C & D. The resultant ASU unemployment rate is checked by column J to discern if the rate exceeds 6.5%. If it does, a "1" is entered in column J. If there is a "1" in column J for any geographic area within a WDA, the WDA total ASU unemployment in column C is entered into column J of the "sum" row for the WDA. This value is then divided by the state total ASU unemployment to report the WDA share of ASU unemployment.
- Column H calculates the LAUS unemployment rate for each geographic area listed in column A by dividing the LAUS unemployment in column E by the sum of column E & F. The result is checked by column I. If column H is greater than 4.5%, column I calculates the number of unemployed the equivalent to 4.5% of the labor force and subtracts that number from the number of LAUS unemployed in column E. Provided the result of that calculation exceeds zero it is entered into column I. The column totals the result from all geographic areas in the WDA to determine the WDA's number of excess unemployed and enters it into the "sum" row. The WDA's share is entered into just below the "sum" row and is calculated by dividing the WDA number of excess unemployed by the State Excess unemployed total.
- Columns E & F data in the "sum" row for each WDA is exported to the UI Concentrations tab columns H & I respectively and are used to calculate an unemployment rate; which should match the LAUS unemployment rate in the "sum" row of column H on this tab.

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- Columns I & J data in the “sum” row are exported to the 3-Part tab, columns K & L respectively. There this data is used to calculate the WDA share of Excess unemployment (column E) and share of ASU unemployment (column F). The shares calculated here should equal the shares in the row just below the “sum” line for each WDA on this tab.
- All cells are locked on this tab. The only time data entry is required is if there is a mismatch on the list of geographic areas.

**LAUS Data TAB:** The Local Area Unemployment Statistics (LAUS) program manager conducts the ASU exercise every year for the US Department of Labor. County level unemployment data from the LAUS program and the most recent US Census data (currently 2000) is used. In order for an area to qualify as an ASU, the total unemployment has to be 6.451% or greater, the population has to be at least 10,000 and all components of the ASU area have to be contiguous. An ASU can be a county, city, or combination of areas, such as census tracts and counties.

In order to develop a qualifying ASU, the 12-month average of the LAUS data for the most recent period ending in June is calculated for each county and city (population 25,000+) in the state. July-Dec of the prior year uses LAUS benchmarked data; data for the current year Jan-May uses revised data and June uses preliminary data. Data from the 2000 Census is available for the counties and cities and is broken down by census tract within each of those areas.

If a single county or city does not have a 12-month average unemployment rate of 6.451% or greater, surrounding counties or cities can be added (or subtracted) until the contiguous area reaches the 6.451% threshold. Individual census tracts within the counties or cities are examined in an attempt to include those tracts with the highest number of unemployed persons. All areas that are included in the ASU have to be contiguous and the total population of the included areas must be at least 10,000 (based on Census 2000). Since monthly LAUS data is not available at the census tract level, the census tracts in a given county that are being included in the ASU area are multiplied by the total LAUS unemployment and employment (12-month average) for that county. This ratio is called the Census-Share (and is column O in the WIASU spreadsheet; the 12-month LAUS average is column N.)

Once as many areas of the state as possible have been exhausted into ASUs and the data has been submitted and approved by the US Department of Labor, the ASU designations and the corresponding data are used internally in the WIA/DW allocation process.

The file used for the within state allocation is submitted to the DOL in accord with instructions in Training and Employment Guidance Letter 04-09 and BLS LAUS Technical Memorandum No. S-09-23. This file is used by the DOL to determine allotments to states.

The Allocations Developer copies “Column N” and “Column O” into the LAUS Tab taking care to match data to geographic areas.

**Decline Data TAB:** This tab stores the raw data used by the Industry Decline tab to calculate the WDA shares of employment in declining industry. The QCEW Lead worker provides the data in mid January after receiving specifications in a data request from the Allocations Developer.

How the file is created:

- Designed to compare most current and a reference year (Calendar year 2008 and 2003 for PY2010 calculations).
- Employment is added up for each month of the quarter for all 4 quarters to provide a summary total. (This yields very high numbers, basically 12 times as high as normal level of employment).
- Employment is reported by NAICS sector groups.

**WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

- Units count is summed by quarter and divided by 4 to provide average units counts (Unit counts are not used to calculate allocation shares.)
- County and its corresponding WDA inclusion and NAICS industry sector groups are assigned.
- No calculations regarding change in the number of units or in employment are provided
- Results of the job are sent to the Allocations Developer in a text file.
- The text file must be copied into this tab and should match the column format set in the tab.
- This tab is not locked.

**Updates TAB:** This Tab will be used to document changes to the workbook whenever changes are performed.

**WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

Attachments:

Attachment A: WIA Sec 128 Within State Allocations

Attachment B: WIA Sec 133 Within State Allocations

Attachment C: WIA Regulations Sec. 667.135 Hold Harmless

Attachment D: Data Source matrix

Attachment E: Allocation Checklist

Attachment A  
WORKFORCE INVESTMENT ACT OF 1998  
Public Law 105-220--Aug. 7, 1998 112 Stat. 936  
SEC. 128. WITHIN STATE ALLOCATIONS

WORKFORCE INVESTMENT ACT OF 1998  
Public Law 105-220--Aug. 7, 1998 112 Stat. 936

SEC. 128. WITHIN STATE ALLOCATIONS

(a) Reservations for State Activities.--

(1) In general.--The Governor of a State shall reserve not more than 15 percent of each of the amounts allotted to the State under section 127(b)(1)(C) and paragraphs (1)(B) and (2)(B) of section 132(b) for a fiscal year for statewide workforce investment activities.

(2) Use of funds.--Regardless of whether the reserved amounts were allotted under section 127(b)(1)(C), or under paragraph (1)(B) or (2)(B) of section 132(b), the Governor may use the reserved amounts to carry out statewide youth activities described in section 129(b) or statewide employment and training activities, for adults or for dislocated workers, described in paragraph (2)(B) or

(3) of section 134(a).

(b) Within State Allocation.--

(1) Methods.--The Governor, acting in accordance with the State plan, and after consulting with chief elected officials in the local areas, shall allocate the funds that are allotted to the State for youth activities and statewide workforce investment activities under section 127(b)(1)(C) and are not reserved under subsection (a), in accordance with paragraph (2) or (3).

(2) Formula allocation.--

(A) Youth activities.--

(i) Allocation.--In allocating the funds described in paragraph

(1) to local areas, a State may allocate--

(I) 33 1/3 percent of the funds on the basis described in section 127(b)(1)(C)(ii)(I);

(II) 33 1/3 percent of the funds on the basis described in section 127(b)(1)(C)(ii)(II); and

(III) 33 1/3 percent of the funds on the basis described in clauses (ii)(III) and (iii) of section 127(b)(1)(C).

(ii) Minimum percentage.--Effective at the end of the second full fiscal year after the date on which a local area is designated under section 116, the local area shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years.

Amounts necessary for increasing such allocations to local areas to comply with the preceding sentence shall be obtained by ratably reducing the allocations to be made to other local areas under this subparagraph.

(iii) Definition.--The term "allocation percentage", used with respect to fiscal year 2000 or a subsequent fiscal year, means a percentage of the funds referred to in clause (i), received through an allocation made under this subparagraph, for the fiscal year.

(B) Application.--For purposes of carrying out subparagraph (A)--

(i) references in section 127(b) to a State shall be deemed to be references to a local area;

(ii) references in section 127(b) to all States shall be deemed to be references to all local areas in the State involved; and

(iii) except as described in clause (i), references in section 127(b)(1) to the term "excess number" shall be considered to be references to the term as defined in section 127(b)(2).

(3) Youth discretionary allocation.--In lieu of making the allocation described in paragraph (2)(A), in allocating the funds described in paragraph (1) to local areas, a State may distribute--

(A) a portion equal to not less than 70 percent of the funds in accordance with paragraph (2)(A); and

(B) the remaining portion of the funds on the basis of a formula that--

(i) incorporates additional factors (other than the factors described in paragraph (2)(A)) relating to--

(I) excess youth poverty in urban, rural, and suburban local areas; and

(II) excess unemployment above the State average in urban, rural, and suburban local areas; and

(ii) was developed by the State board and approved by the Secretary as part of the State plan.

(4) Limitation.--

**WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

(A) In general.--Of the amount allocated to a local area under this subsection and section 133(b) for a fiscal year, not more than 10 percent of the amount may be used by the local board for the administrative cost of carrying out local workforce investment activities described in subsection (d) or (e) of section 134 or in section 129(c).

(B) Use of funds.--Funds made available for administrative costs under subparagraph (A) may be used for the administrative cost of any of the local workforce investment activities described in subsection (d) or (e) of section 134 or in section 129(c), regardless of whether the funds were allocated under this subsection or section 133(b).

(C) Regulations.--The Secretary, after consulting with the Governors, shall develop and issue regulations that define the term "administrative cost" for purposes of this title. Such definition shall be consistent with generally accepted accounting principles.

(c) Reallocation Among Local Areas.--

(1) In general.--The Governor may, in accordance with this subsection, reallocate to eligible local areas within the State amounts that are allocated under paragraph (2)(A) or (3) of subsection (b) for youth activities and that are available for reallocation.

(2) Amount.--The amount available for reallocation for a program year is equal to the amount by which the unobligated balance of the local area allocation under paragraph (2)(A) or (3) of subsection (b) for such activities, at the end of the program year prior to the program year for which the determination under this paragraph is made exceeds 20 percent of such allocation for the prior program year.

(3) Reallocation.--In making reallocations to eligible local areas of amounts available pursuant to paragraph (2) for a program year, the Governor shall allocate to each eligible local area within the State an amount based on the relative amount allocated to such local area under subsection (b)(3) for such activities for the prior program year, as compared to the total amount allocated to all eligible local areas in the State under subsection (b)(3) for such activities for such prior program year. For purposes of this paragraph, local areas that received allocations under subsection (b)(2)(A) for the prior program year shall be treated as if the local areas received allocations under subsection (b)(3) for such year.

(4) Eligibility.--For purposes of this subsection, an eligible local area means a local area that has obligated at least 80 percent of the local area allocation under paragraph (2)(A) or (3) of subsection (b) for such activities, for the program year prior to the program year for which the determination under paragraph (2) is made.

ATTACHMENT B  
WORKFORCE INVESTMENT ACT OF 1998  
Public Law 105-220--Aug. 7, 1998 112 Stat. 936  
SEC. 133. WITHIN STATE ALLOCATIONS

WORKFORCE INVESTMENT ACT OF 1998  
Public Law 105-220--Aug. 7, 1998 112 Stat. 936

SEC. 133. WITHIN STATE ALLOCATIONS

(a) Reservations for State Activities.--

(1) Statewide workforce investment activities.--The Governor of a State shall make the reservation required under section 128(a).

(2) Statewide rapid response activities.--The Governor of the State shall reserve not more than 25 percent of the total amount allotted to the State under section 132(b)(2)(B) for a fiscal year for statewide rapid response activities described in section 134(a)(2)(A).

(b) Within State Allocation.--

(1) Methods.--The Governor, acting in accordance with the State plan, and after consulting with chief elected officials in the local areas, shall allocate--

(A) the funds that are allotted to the State for adult employment and training activities and statewide workforce investment activities under section 132(b)(1)(B) and are not reserved under subsection (a)(1), in accordance with paragraph (2) or (3); and

(B) the funds that are allotted to the State for dislocated worker employment and training activities under section 132(b)(2)(B) and are not reserved under paragraph (1) or (2) of subsection (a), in accordance with paragraph (2).

(2) Formula allocations.--

(A) Adult employment and training activities.--

(i) Allocation.--In allocating the funds described in paragraph (1)(A) to local areas, a State may allocate--

(I) 33 1/3 percent of the funds on the basis described in section 132(b)(1)(B)(ii)(I);

(II) 33 1/3 percent of the funds on the basis described in section 132(b)(1)(B)(ii)(II); and

(III) 33 1/3 percent of the funds on the basis described in clauses (ii)(III) and (iii) of section 132(b)(1)(B).

(ii) Minimum percentage.--Effective at the end of the second full fiscal year after the date on which a local area is designated under section 116, the local area shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years. Amounts necessary for increasing such allocations to local areas to comply with the preceding sentence shall be obtained by ratably reducing the allocations to be made to other local areas under this subparagraph.

(iii) Definition.--The term "allocation percentage", used with respect to fiscal year 2000 or a subsequent fiscal year, means a percentage of the funds referred to in clause (i), received through an allocation made under this subparagraph, for the fiscal year.

(B) Dislocated worker employment and training activities.--

(i) Formula.--In allocating the funds described in paragraph (1)(B) to local areas, a State shall allocate the funds based on an allocation formula prescribed by the Governor of the State. Such formula may be amended by the Governor not more than once for each program year. Such formula shall utilize the most appropriate information available to the Governor to distribute amounts to address the State's worker readjustment assistance needs.

(ii) Information.--The information described in clause (i) shall include insured unemployment data, unemployment concentrations, plant closing and mass layoff data, declining industries data, farmer-rancher economic hardship data, and long-term unemployment data.

(C) Application.--For purposes of carrying out subparagraph (A)--

(i) references in section 132(b) to a State shall be deemed to be references to a local area;

(ii) references in section 132(b) to all States shall be deemed to be references to all local areas in the State involved; and

(iii) except as described in clause (i), references in section 132(b)(1) to the term "excess number" shall be considered to be references to the term as defined in section 132(b)(1).

(3) Adult employment and training discretionary allocations.--In lieu of making the allocation described in paragraph (2)(A), in allocating the funds described in paragraph (1)(A) to local areas, a State may distribute--

(A) a portion equal to not less than 70 percent of the funds in accordance with paragraph (2)(A); and

(B) the remaining portion of the funds on the basis of a formula that--

**WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010**

(i) incorporates additional factors (other than the factors described in paragraph (2)(A)) relating to--

(I) excess poverty in urban, rural, and suburban local areas; and

(II) excess unemployment above the State average in urban, rural, and suburban local areas; and

(ii) was developed by the State board and approved by the Secretary as part of the State plan.

(4) Transfer authority.--A local board may transfer, if such a transfer is approved by the Governor, not more than 20 percent of the funds allocated to the local area under paragraph (2)(A) or (3), and 20 percent of the funds allocated to the local area under paragraph (2)(B), for a fiscal year between--

(A) adult employment and training activities; and

(B) dislocated worker employment and training activities.

(5) Allocation.--

(A) In general.--The Governor of the State shall allocate the funds described in paragraph (1) to local areas under paragraphs (2) and (3) for the purpose of providing a single system of employment and training activities for adults and dislocated workers in accordance with subsections (d) and (e) of section 134.

(B) Additional requirements.--

(i) Adults.--Funds allocated under paragraph (2)(A) or (3) shall be used by a local area to contribute proportionately to the costs of the one-stop delivery system described in section 134(c) in the local area, and to pay for employment and training activities provided to adults in the local area, consistent with section 134.

(ii) Dislocated workers.--Funds allocated under paragraph (2)(B) shall be used by a local area to contribute proportionately to the costs of the one-stop delivery system described in section 134(c) in the local area, and to pay for employment and training activities provided to dislocated workers in the local area, consistent with section 134.

(c) Reallocation Among Local Areas.--

(1) In general.--The Governor may, in accordance with this subsection, reallocate to eligible local areas within the State amounts that are allocated under paragraph (2)(A) or (3) of subsection (b) for adult employment and training activities and that are available for reallocation.

(2) Amount.--The amount available for reallocation for a program year is equal to the amount by which the unobligated balance of the local area allocation under paragraph (2)(A) or (3) of subsection (b) for such activities, at the end of the program year prior to the program year for which the determination under this paragraph is made exceeds 20 percent of such allocation for the prior program year.

(3) Reallocation.--In making reallocations to eligible local areas of amounts available pursuant to paragraph (2) for a program year, the Governor shall allocate to each eligible local area within the State an amount based on the relative amount allocated to such local area under subsection (b)(3) for such activities for the prior program year, as compared to the total amount allocated to all eligible local areas in the State under subsection (b)(3) for such activities for such prior program year. For purposes of this paragraph, local areas that received allocations under subsection (b)(2)(A) for the prior program year shall be treated as if the local areas received allocations under subsection (b)(3) for such year.

(4) Eligibility.--For purposes of this subsection, an eligible local area means a local area that has obligated at least 80 percent of the local area allocation under paragraph (2)(A) or (3) of subsection (b) for such activities, for the program year prior to the program year for which the determination under paragraph (2) is made.

ATTACHMENT C  
20 CFR Part 652 and Parts 660 through 671  
Workforce Investment Act

[Federal Register: August 11, 2000 (Volume 65, Number 156)]  
[Rules and Regulations]  
[Page 49293-49342]

DEPARTMENT OF LABOR  
Employment and Training Administration  
20 CFR Part 652 and Parts 660 through 671  
Workforce Investment Act  
AGENCY: Employment and Training Administration (ETA), Labor.  
ACTION: Final rule.

Sec. 667.135 What "hold harmless" provisions apply to WIA adult and youth allocations?

- (a)
- (1) For the first two fiscal years after the date on which a local area is designated under section 116 of WIA, the State may elect to apply the "hold harmless" provisions specified in paragraph (b) of this section to local area allocations of WIA youth funds under Sec. 667.130(c) and to allocations of WIA adult funds under Sec. 667.130(d).
- (2) Effective at the end of the second full fiscal year after the date on which a local area is designated under section 116 of WIA the State must apply the "hold harmless" specified in paragraph (b) of this section to local area allocations of WIA youth funds under Sec. 667.130(c) and to allocations of WIA adult funds under Sec. 667.130(d).
- (3) There are no "hold harmless" provisions that apply to local area allocations of WIA dislocated worker funds.
- (b)
- (1) If a State elects to apply a "hold-harmless" under paragraph (a)(1) of this section, a local area must not receive an allocation amount for a fiscal year that is less than 90 percent of the average allocation of the local area for the two preceding fiscal years.
- (2) In applying the "hold harmless" under paragraph (a)(2) of this section, a local area must not receive an allocation amount for a fiscal year that is less than 90 percent of the average allocation of the local area for the two preceding fiscal years.
- (3) Amounts necessary to increase allocations to local areas must be obtained by ratably reducing the allocations to be made to other local areas.
- (4) If the amounts of WIA funds appropriated in a fiscal year are not sufficient to provide the amount specified in paragraph (b)(1) of this section to all local areas, the amounts allocated to each local area must be ratably reduced. (WIA secs. 128(b)(2)(A)(ii), 133(b)(2)(A)(ii), 506.)

Sec. 667.140 Does a Local Board have the authority to transfer funds between programs?

- (a) A Local Board may transfer up to 20 percent of a program year allocation for adult employment and training activities, and up to 20 percent of a program year allocation for dislocated worker employment and training activities between the two programs.
- (b) Before making any such transfer, a Local Board must obtain the Governor's approval.
- (c) Local Boards may not transfer funds to or from the youth program.

Attachment D  
Data Sources for WIA Allocations

WISCONSIN WORKFORCE INVESTMENT ACT STATE PLAN: MOST CURRENT AVAILABLE JUNE 2010

ATTACHMENT D

Data Sources for the WIA Allocations:

Data Require to Calculate Allocations	Contact Name	Source
Relative share of the Excess Unemployment by WDA	Heather Thompson 7-5053	An electronic file is provided by LAUS Research Analyst for the most recent program year after validation by BLS (ARRA used calendar year and was not validated until after allocations were required to be out.) Validation is not benchmarking. The file is submitted to the DOL in accord with instructions in Training and Employment Guidance Letter 04-09 and BLS LAUS Technical Memorandum No. S-09-23. This file is used by the DOL to determine allotments to states.
Relative share of the unemployed in ASUs by WDA		
WDA concentrations of unemployed		
Relative share of the Economically Disadvantaged Adults by WDA	Gary Denis 7-9704	Poverty and Lower Living Standard Income Level (LLSIL) Data is provided by the Department of Labor ETA. File contains adjusted 2000 Census data to tally numbers of people in each census tract that have income below 70% of the LLSIL. Data is provided about 4 years after completion of the census. Source data is on CD from Social Policy Research Assoc.
Relative share of the Economically Disadvantaged Youth by WDA		
Prorated share of the total loss in the number of farms in 2007 from a 1982-84 base period	NASS Website	Data on the number of farms on the most current Census of Agriculture is available on the <a href="http://www.nass.usda.gov/Data_and_Statistics/index.asp">http://www.nass.usda.gov/Data_and_Statistics/index.asp</a> . The US Dept of Agriculture, National Agricultural Statistical Service, maintains this data. Data is captured from Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2007 and 2002.
WDA share of unemployment recipients	Cathy Sill 6-0858	This data is received via a PDF file from UID and is available in late January. The data is for the prior calendar year and generated as report DWDUIBNP-UI9618.TSOLIB.WIAUIDUR. Data is provided on Table of SDA by WKPD. Data could be provided as a TXT file.
WDA share of long term unemployed in state		
WDA share of laid off individuals as reported through WARN	Jerry Smith 6-5373	The Dislocated Worker Unit provides this data annually. The report is known as Table 2c
WDA share of employment in declining industries	Deb Holt 6-5321	QCEW Unit provides this data file in mid-January. Data compares most recent year to a criterion year. Whoever is doing the allocations specifies the criterion year. The comparison years are included in the request for a report file to BITS.

***Attachment E***

***Annual Allocations Development Checklist***

Wisconsin Workforce Investment Act State Plan: Most Current Available June 2010

Allocations Development Checklist

Attachment E

	Task Required	Responsible Person	Date Due	Complete? Initial & Date
1	BWT Allocation Staff meet to prepare for the project.	BWT Director	Jan 4 <sup>th</sup>	
2	Request data from data sources identified in "Attachment D" of the Allocations Guide.	LMI Section Chief	Jan 5 <sup>th</sup>	
3	Data is received by the Allocations Developer.	LMI Section Chief	Jan. 25 <sup>th</sup>	
4	Data is validated against specifications.	LMI Section Chief	Feb 1 <sup>st</sup>	
5	Internal Review Team (IRT) informed by email of the date that the Allocation Share review process starts.	LMI Section Chief	Feb 5 <sup>th</sup>	
6	Allocation Template reviewed to ensure that historic data is moved to storage and reference data is up to date.	LMI Section Chief	Feb 5 <sup>th</sup>	
7	BWT Allocation staff meets to assess progress and resolve data issues.	BWT Director	Feb 5 <sup>th</sup>	
8	Summary of Allocation project progress sent to AO.	BWT Director	Feb 8 <sup>th</sup>	
9	Data is entered into tabs in Allocation Template and Template renamed Allocations PYXX and is sent to the IRT for review.	LMI Section Chief	Feb 10 <sup>th</sup>	
10	Internal Review Team completes review and provides feedback to the Allocations Developer.	IRT members	Feb 17 <sup>th</sup>	
11	Complete adjustments to the spreadsheet and allocation shares based on the IRT review.	LMI Section Chief	Feb 18 <sup>th</sup>	
12	Send PY10 Allocation Shares Spreadsheet & Allocations Guide to the Allocations Team for review.	BWT Director	Feb 22 <sup>nd</sup>	
13	Meet with the Allocations Team to review/discuss the PY10 Allocation Shares development/process.	LMI Section Chief	Feb 26 <sup>th</sup>	
14	Complete revisions to allocations shares that come from the Allocations Team review.	LMI Section Chief	Mar 8 <sup>th</sup>	
15	Prepare the Admin Memo to transmit Allocation Shares to the workforce system for review and comment.	BWT Director	Mar 8 <sup>th</sup>	
16	Send ADM with Allocation Shares to Workforce System.	Administrator's Office	Mar 10 <sup>th</sup>	
17	Comments received from Workforce System.	LMI Section Chief	Mar 19 <sup>th</sup>	
18	Reconvene the Allocation Team to review comments received by the 19 <sup>th</sup> .	LMI Section Chief	Mar 23 <sup>rd</sup>	
19	Finalize the Allocation Shares.	LMI Section Chief	Mar 26 <sup>th</sup>	
20	Receive TEGL announcing state allotments.	BWT Director		
21	IRT reviews TEGL to determine if there are policy issues that affects the allocation process and spreadsheets are adjusted as required.	LMI Section Chief	Within 10 days of receipt	
22	Calculate the Allocations & prepare the ADM to transmit final allocation shares and allocation amounts.	LMI Section Chief	15 days after TEGL	
23	Issue ADM to the Workforce Development Board Directors and other interested parties.	Administrator's Office	20 days post TEGL	

**ATTACHMENT Q**

**WISCONSIN'S  
AMERICAN RECOVERY and REINVESTMENT ACT  
ADDENDUM  
to the  
WORKFORCE INVESTMENT ACT  
STATE PLAN PROGRAM YEAR 2009- 2010  
JUNE 2009**



**ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

**Index of American Recovery and Reinvestment Act Addendum  
to  
Wisconsin's Plan Modification Program Year 2009 - 2010**

**American Recovery and Reinvestment Act (ARRA) Elements Required per the Training  
and Employment Guidance Letter 14- 08:**

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## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

### Introduction

Governor Doyle submitted Wisconsin's Workforce Investment Act State Plan Modification for program year 2009 - 2010 on April 15, 2009. This submission was warranted due to the major modifications that had occurred to improve the workforce system and upgrade the skills of our citizens.

This Wisconsin American Recovery and Reinvestment Act Addendum is an amplification of the State Plan Modification. [The notations in brackets below each section in this ARRA Addendum identifies the page numbers in the State Plan Modification for cross-reference purposes between the two documents.]

The April 15, 2009 State Plan Modification incorporates many of the *Invest in People* strategies contained in the Governor's plan for growing Wisconsin's economy, *GROW Wisconsin - the Next Steps*. Last fall, the Governor charged Wisconsin's Council on Workforce Investment with developing recommendations that could improve the State's workforce system. Earlier this year, the Governor accepted the recommendations, and incorporated these, along with the strategies from the *GROW Wisconsin* plan, into the Plan Modification. These and other efforts, combined with the recently launched Wisconsin Sector Strategy Initiative, represented a substantial shift in policy that necessitated a major modification to the Workforce Investment Act Plan.

During the planning development, the passage of the American Recovery and Reinvestment Act occurred. The direction set forth in the State Plan Modification provided a solid foundation on which to build those recovery efforts. Therefore, the State of Wisconsin is submitting a stand-alone ARRA to meet the elements required by June 30, 2009.

# ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

## Section I. Context, Vision, and Strategy

### **Economic and Labor Market Context**

**Question IV in PY 2009 Stand-Alone Planning Guidance: Provide a detailed analysis of the state's economy, the labor pool, and the labor market context. (§112(b)(4).)**

*In responding to this question, the state should update its analysis to indicate how the economic downturn has impacted the state's economy and the labor market context. This analysis should include current and anticipated impacts on employment by sector, current and projected demographics of the available labor pool including income levels as appropriate, and describe any skills gaps the state faces, based on the skills held by current and expected dislocated workers and the skills demanded by industries and occupations expected to grow through economic recovery.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 9]

Economic activity in Wisconsin, as measured in non-farm jobs, declined steeply since the late fall of 2008. A comparison of jobs reported in the Quarterly Census of Employment and Wages (QCEW) data for the fourth quarter 2007 to preliminary data for fourth quarter 2008, shows the combined construction, trade/ transportation & utilities, and durable goods sectors with a net job decline greater than the Wisconsin economy as a whole. Increases in jobs in the educational and health services group, in both the public and private sectors, offset significant additional job loss in the professional services and leisure and hospitality sectors. Table 1 summarizes the changes in jobs.

Table 1  
Changes in Jobs from Fourth Quarter 2007 to Fourth Quarter 2008  
By Major Economic Sectors

	4th Qtr 2007 Jobs	4th Qtr 2008 Jobs	Change	% Change	4th Qtr 2007 Total wage	4th Qtr 2008 Total wage	Change	% Change
10- Natural Resources and Mining	21,872	22,633	761	3.5%	191,991,602	218,904,234	26,912,632	14.0%
20 - Construction	121,432	108,320	(13,112)	-10.8%	1,683,630,163	1,589,986,069	(93,644,094)	-5.6%
30 - Manufacturing	498,016	478,083	(19,933)	-4.0%	6,157,826,795	6,096,785,424	(61,041,371)	-1.0%
32-33 - Durable Goods Manufacturing	429,524	409,390	(20,134)	-4.7%	5,482,273,019	5,393,560,383	(88,712,636)	-1.6%
31 - Non-Durable Goods Manufacturing	68,492	67,387	(1,105)	-1.6%	675,553,776	704,959,147	29,405,371	4.4%
40 - Trade, Transportation and Utilities	559,760	542,676	(17,084)	-3.1%	4,609,980,034	4,665,711,734	55,731,700	1.2%
42 - Wholesale Trade	122,930	120,868	(2,062)	-1.7%	1,678,525,570	1,725,233,449	46,707,879	2.8%
44-45 - Retail Trade	328,509	317,588	(10,921)	-3.3%	1,805,651,443	1,795,514,826	(10,136,617)	-0.6%
22, 48-49 - Transportation and Utilities	108,321	104,434	(3,887)	-3.6%	1,125,803,021	1,116,814,503	(8,988,518)	-0.8%
50 - Information	50,759	49,603	(1,156)	-2.3%	639,212,359	664,346,755	25,134,396	3.9%
55 - Financial Activities	213,609	211,184	(2,425)	-1.1%	2,075,869,177	2,043,395,342	(32,473,835)	-1.6%
60 - Professional and Business Services	284,102	272,470	(11,632)	-4.1%	3,428,175,575	3,440,638,205	12,462,630	0.4%
65 - Education and Health Services	373,361	382,817	9,456	2.5%	3,950,770,025	4,155,705,755	204,935,730	5.2%
70 - Leisure and Hospitality	251,027	243,328	(7,699)	-3.1%	881,731,529	880,837,986	(893,543)	-0.1%
80 - Other Services	87,096	87,128	32	0.0%	504,251,092	513,294,985	9,043,893	1.8%
90 - Government	394,026	399,040	5,014	1.3%	3,947,076,342	4,217,619,891	270,543,549	6.9%
Total*	2,855,060	2,797,282	(57,778)	-2.0%	28,070,514,693	28,487,226,380	416,711,687	1.5%

\*May not add due to rounding  
QCEW unpublished data  
Created by Nicki Stapleton 05/05/09

Perhaps surprisingly, total wages in non-farm jobs does not present a similar picture. As Table 2 shows, total wages increased in both annual 2008 and fourth quarter statistics as compared to 2007. There are several possible explanations for the different outcomes in job and wage measurements. Regardless of cause, the divergence raises significant concerns because it suggests that the observed decline in jobs does not reflect a slow down in the economy in the traditional sense. The decline in economic activity is not the result of decreased purchasing power in the economy. This raises the possibility that increasing job loss will trigger declines in purchasing power and thus trigger a further decline in economic activity.

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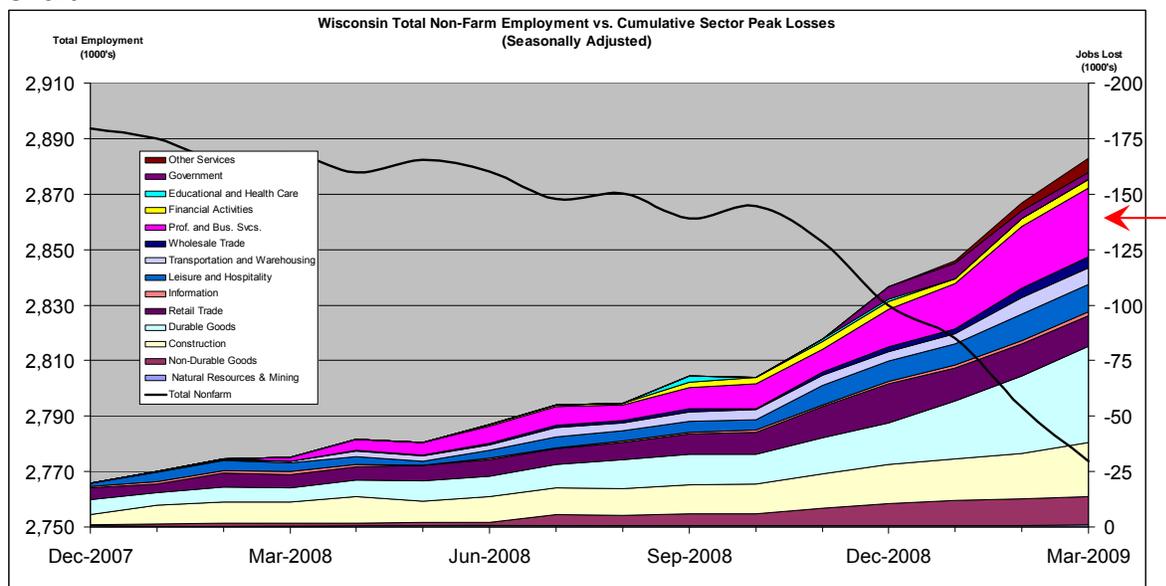
## TABLE 2 TOTAL NON-FARM WAGES 1999 THROUGH 2008

		Total Non-Farm Wages 1999 - 2008		
YEAR	WAGES IN \$	PERCENT	WAGES IN \$	PERCENT
	FOURTH QUARTER	CHANGE	ANNUAL	CHANGE
		from prior year		from prior year
1999/4	19,676,605,088		53,301,184,603	
2000/4	22,373,532,582	13.71%	83,983,923,011	
2001/4	22,610,156,717	1.06%	85,714,224,830	2.06%
2002/4	23,227,701,865	2.73%	87,358,631,931	1.92%
2003/4	24,120,114,195	3.84%	89,852,274,077	2.85%
2004/4	25,780,146,267	6.88%	94,330,500,735	4.98%
2005/4	25,751,961,014	-0.11%	97,339,819,075	3.19%
2006/4	27,110,112,791	5.27%	101,900,920,907	4.69%
2007/4	28,133,214,599	3.77%	105,828,175,811	3.85%
2008/4	28,579,392,494	1.59%	108,446,642,972	2.47%
	Average change	4.30%		3.25%

Source: Wisconsin QCEW

Current Employment Statistics (CES) estimates for the first three months of 2009 extend the available information on sector job loss. Chart 1 presents the information on job loss by sector since June 2007<sup>1</sup> and demonstrates the rapid decline in jobs in the six months ending March 2009.

Chart 1



<sup>1</sup> The CES data has been benchmarked to the QCEW information through October 2008.

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As Chart 1 shows, significant job loss first appeared in the construction, durable goods, retail trade, and leisure and hospitality sectors as early as January of 2008. Prior to the significant decline in the economy in the fourth quarter of 2008, the sectors experiencing job loss expanded to include non durable goods and professional and administrative services, primarily temporary employment services. Since October of 2008, accelerating job losses in the durable, non-durable, construction and temporary services have led the overall decline in the economy.

The QCEW data provides detail on the specific areas experiencing job losses, allowing additional analysis of potential job creation/loss in the future. Notably, the professional service sector has experienced significant job contraction. (See arrow in Chart 1). Local data suggests one-third of all temporary jobs have been lost.<sup>2</sup>

The job losses in the professional services sector are primarily in temporary employment services. A 2005 study by the Bureau of Labor Statistics identified the underlying business sectors where the use of temporary employees was the most extensive. (See Table 3 below.) We hypothesize that businesses historically most sensitive to economic cycles have modified their workforce to provide greater flexibility in employment levels. The durable goods sector provides an insightful exception to the correlation. As Chart 1 shows, the durable goods industry in Wisconsin has been in a long-term decline in employment. Therefore, it is likely that relatively few temporary employees work in the durable goods sector. The continuing decline in employment reflects full time, long-term employees losing jobs.

Table 3 Temporary Employment Services by Sector

<b>Industry</b>	<b>Temporary Employment Services Concentration</b>
<b>Natural Resources &amp; Mining</b>	<b>0.57%</b>
<b>Construction</b>	<b>13.10%</b>
<b>Manufacturing</b>	<b>6.37%</b>
<b>Retail Trade</b>	<b>6.50%</b>
<b>Information</b>	<b>1.67%</b>
<b>Leisure and Hospitality</b>	<b>8.08%</b>
<b>Transportation and Warehousing</b>	<b>4.47%</b>
<b>Wholesale Trade</b>	<b>2.77%</b>
<b>Prof. and Bus. Services.</b>	<b>19.03%</b>
<b>Financial Activities</b>	<b>2.37%</b>
<b>Educational and Health Care</b>	<b>24.13%</b>
<b>Government</b>	<b>3.03%</b>
<b>Other Services</b>	<b>5.07%</b>

The progression of job losses in the various sectors is suggestive of the important role of consumer confidence in the economic activities. The decline in the construction market, particularly in residential housing and the decline in automotive manufacturing lead to a decline in demand in markets for clothing, food, home improvement gardening and building supplies. A plausible explanation for this progression is that individual families are restructuring their finances to reduce debt and short-term cash flow, regardless of loss of jobs. Purchases of durable goods may have been postponed even in families without threat of job loss. As the

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<sup>2</sup> The sample returns in CES from temporary service providers suggest a much stronger downturn than Small Domain model provided by BLS, due to the model's reliance on historic trends.

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reduction in demand moves from purchases of products and services financed over longer terms to those paid from present earnings, the reduction in demand shifts toward more discretionary purchases, and may signal further job loss in other sectors.

In light of the reduction in consumer spending and increase in savings reported in national surveys, anticipating the pace of economic recovery and identifying potential skill availability among unemployed and underemployed requires very detailed knowledge of specific jobs lost and very detailed projections of products consumers will purchase in the near future. For example, manufacturing of windows and doors dominates the wood products sector in Wisconsin and is a major driver in the decline in durable manufacturing jobs. This six-digit NAICS code grouping lost over 1000 jobs during calendar year 2008, with virtually every employer eliminating jobs. Absent an upswing in new home construction, workers in this sector will require retraining to other skill sets. The skills in this sector may be applicable in sectors stimulated as part of the growth of green jobs. High efficiency windows and doors could become a significant element in creating green jobs. However, the present technology, lacking in differentiation in window products to reflect local weather conditions and the orientation of the windows, severely limits the potential for energy use reduction in residential and small commercial applications. Therefore, a significant increase in demand to retrofit existing homes and small businesses may not immediately increase demand for manufacturing of windows and doors. This situation is analogous to the lack of high mileage automobiles manufactured in Wisconsin and the reluctance of consumers with available financing to make significant purchases of products that do not produce reduced cash flow requirements in the future.

One valid conclusion from the pattern of job loss in this recession is that a rapid return to full employment can be achieved only with a bottom up understanding of the relationship of need, demand, specific products and services, and their related supply chains.

The progression of job loss demonstrated in Chart 1 must be reversed by creating high valued added consumer products at prices consistent with the realignment of consumers' financial situation. If the benefits of initiatives undertaken to create new, well-paying jobs through funding of shovel ready infrastructure jobs are to be maintained, the next phase of economic recovery must focus on reducing the cost of personal infrastructure and financing costs to consumers. The real cost of housing, health care, and transportation must decline, creating additional discretionary spending to fund purchases of personal choice products and services such as clothes, entertainment, recreation and charity giving. These products and services are extremely important to fueling the multiplier effect and the velocity of money necessary to bring full employment to Wisconsin and the nation.

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### ***State Vision and Priorities***

#### ***Question I.C. What is the Governor's vision for ensuring a continuum of education and training opportunities that support a skilled workforce? (§112(a) and (b)(4).)***

*In responding to this question, the state should review ETA's vision for implementing the Recovery Act in Section 4 of this TEGL, and describe the Governor's new vision since the economic downturn. The description should include the Governor's vision for economic recovery, touching on the Act's principles and the Governor's view of how the Recovery Act funds can be integrated into transformational efforts to achieve an invigorated, more innovative public workforce system capable of helping enable future economic growth and advancing shared prosperity for all Americans.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 2]

Governor Doyle set forth firm new directions to meet the 21<sup>st</sup> Century workforce and economic challenges that are discussed in the Wisconsin's Workforce Investment Act (WIA) State Plan Modification for program year 2009 - 2010 (PY 09-10). It incorporates the Governor's major workforce initiatives and related activities that ground all planning, program services and infrastructure design at the state and local levels:

- *GROW Wisconsin - The Next Steps: Strategic Plan*
- The Governor's Council on Workforce Investment's (CWI) recommendations including waivers
- The Wisconsin Sector Strategy Initiative to grow the economy and strengthen skills and opportunities
- Regional Industry Skills Education (RISE) Initiative with Career Pathways and Skills Jump Start components

All of the activities from these initiatives dovetail each other for the high-level visions:

- To continue building a solid education and training system responsive to and driven by the needs of workers and employers
- Formalize demand-driven systems that will
  - Ensure that high-growth, high-wage industries have access to employees with the skills they need to grow;
  - Provide the skills and training for individuals to secure good paying jobs by (1) reconfiguring their skill-sets for new careers, or (2) upgrading their skills for advancement, and/or (3) receiving additional assistance for employment placement and retention.

These combined activities substantially shifted policy and service delivery that are addressed in the State Plan. Wisconsin has a solid foundation on which to build further efforts through the American Recovery and Reinvestment Act of 2009 (ARRA).

ARRA is estimated to create or save 70,000 jobs in Wisconsin. After passage of the Act, Governor Doyle immediately **established the Governor's Office of Recovery and Reinvestment** and Internet site <http://www.recovery.wisconsin.gov/> using existing administrative staff to work with communities, local governments, the private sector and other stakeholders to maximize and coordinate ARRA dollars in an open and accountable manner. To ensure transparency, the **Governor issued Executive Order # 278** [Attachment D] on April 20, 2009, **requiring all contractors and subcontractors involved with recovery projects to post job openings on JobCenterofWisconsin** <https://jobcenterofwisconsin.com/>, Wisconsin's Internet employment site that is free, user-friendly and accessible around-the-clock. The

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Internet site, operated by the Department of Workforce Development (DWD), is a popular tool for both job seekers and employers that will now also serve as the premier site for job opportunities on recovery projects. The order further directs all state agencies to include the job posting requirement in all ARRA funded contracts awarded to contractors and subcontractors employing workers in the state.

Given the Governor's Executive Order, this single, powerful tool has already shown dividends. It:

- Provides transparency to the taxpayer;
- Tracks job creation in a timely manner;
- Reaches hard-to-serve populations;
- Helps reemploy unemployment insurance claimants;
- Utilizes existing labor exchange infrastructure; and,
- Reduces recruitment costs for employers and complies with affirmative action.

The Governor's vision for ARRA funds is to help dislocated workers, adults, youth and people with disabilities receive appropriate training, find jobs, and join in revitalizing Wisconsin's economy hand-in-glove with the current employers and potential businesses. On April 16, 2009, the State Legislature's Joint Finance Committee unanimously approved the Governor's request to disburse the ARRA funds.

Wisconsin's **focused ARRA workforce efforts** include:

- Designing new infrastructure projects to create jobs and investments in research and alternative energy projects for a cleaner, healthier environment;
- Increasing assistance to more disadvantaged adults and help them overcome obstacles to employment, gain skills and enter the workforce;
- Serving more veterans particularly with the expanded age range for youth services;
- Expanding successful training programs such as the youth and adult apprenticeships to increase the pipeline of a highly-skilled workforce;
- Improving services to youth by placing them on career paths for jobs of the future;
- Identifying disconnected youth and engaging them in non-traditional training and education;
- Intensifying Job Service efforts to all people receiving unemployment benefits; and
- Expanding partnerships beyond the traditional workforce development network.

Wisconsin's **targeted industries for accelerated training and job placement** are:

- Energy conservation (weatherization), renewable energy sectors and emerging green jobs
- Health Care
- Advanced Manufacturing
- Construction
- Transportation

The above **ARRA priorities expound on the Governor's vision for ensuring a continuum of education and training opportunities summarized in Wisconsin's State Plan Modification PY 09-10:**

- Increasing funding for the Wisconsin Technical College System (WTCS) Workforce Advanced Training Program to increase investment in the development of incumbent workers and expand technical college training services to help businesses;
- Creating Opportunity Grants to assist low-wage workers currently not eligible for technical college financial aid to upgrade their skills;

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- Supporting partnerships between business and education to train people such as the industry-led Manufacturing Skills Standards Certification (MSSC) program that provides workers with required manufacturing skills;
- Creating Skills Jump Start Pilot Training Grants for adults lacking high school degrees with an emphasis on occupational training in high-demand occupations;
- Launching an adult apprenticeship mentoring pilot program for improved retention of minority apprentices in the program;
- Remitting tuition for veterans attending the University of Wisconsin (UW) colleges and WTCS;
- Developing certification of work readiness that will help employers find entry level workers, and implementing a standard skills assessment tool statewide;
- Increasing the State's RISE initiatives to promote skills and opportunities for low-wage working adults;
- Incorporating career clusters and pathways, and access to the training needed throughout the PK-12, WTCS, and postsecondary systems, with free transferability of credits;
- Using waivers to increase on-the-job training and incumbent worker training; and
- Creating the Wisconsin Covenant Foundation for financial assistance to students with need.

***Question I.E. What is the Governor's vision for ensuring that every youth has the opportunity for developing and achieving career goals through education and workforce training, including the youth most in need of assistance, such as out-of-school youth, homeless youth, youth in foster care, youth aging out of foster care, youth offenders, children of incarcerated parents, migrant and seasonal farmworker youth, youth with disabilities, and other youth at risk? (§112(b)(18)(A.)***

*In responding to this question, the state should review ETA's vision for implementing the Recovery Act in Section 16 of this TEGP to reconnect disconnected youth through multiple pathways to education and training that enable them to enter and advance in the workforce. The state should describe its strategy for serving youth with funds from the Recovery Act, as well as how its strategies will be adjusted to respond to the economic downturn. What activities will the state focus on (i.e., primarily focus on summer employment opportunities, the full range of WIA youth services, or a combination)? Describe how plans for the Recovery Act youth activities will complement the state's overall vision for serving youth under WIA.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 3]

**Wisconsin's State Plan addresses the Governor's visions to ensuring the preparation of youth for 21<sup>st</sup> century industries and jobs including:**

- Launching the Wisconsin Covenant to provide access to post-secondary education for all high school students with financial need along with a privately gifted Fund for Wisconsin Scholars;
- Supporting and expanding the Mayor of Milwaukee's summer youth jobs program;
- Revamping career information to include all facets of education and training beginning at grade-school level;
- Promoting career pathways outreach, and increasing interest in demand occupations;
- Designing effective bridge programs that will also rebuild effective training systems;
- Using career clusters as the foundation of movement through the pre-kindergarten - 16 and workforce development systems for needed training with free transferability of credits;
- Investing in proven initiatives such as four-year-old kindergarten, small class sizes and Project Lead the Way (PLTW);

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- Engaging students in more math and science to excel in jobs with changing technology and product innovation;
- Developing improved transition strategies for youth with disabilities;
- Implementing a statewide standard skills assessment tool for graduating high school seniors;
- Integrating pre-kindergarten - 16 Councils into the regional sector strategies efforts; and
- Developing articulation agreements for effective transition from youth apprenticeship to adult apprenticeship programs.

**ARRA funds will augment the above priorities to serve youth as well as increasing efforts to reach and engage youth who have been disenfranchised.** The Governor recognizes that the economic challenges impact even more significantly on the younger population who have been out of the mainstream, may be struggling to find a job, or, to gain the skills they need to retain or advance to a higher paying job. **Wisconsin's focus on ARRA funds for youth entails a combination of summer employment opportunities and the full range of WIA youth services:**

- Early active recruitment for a large-scale summer youth program that includes a broader pool of worksites and increased eligible youth from ages 14 to 24 in order to provide real world work experience and a paycheck;
- Enhancing coordination and collaboration with Corrections, Vocational Rehabilitation, Veterans Services, Youth/Adult Apprenticeship, Cooperative Educational Service and Faith-Based Agencies;
- Increasing intensive add-on support services for populations with additional special needs and vulnerable populations;
- Increasing WDBs involvement in comprehensive, year-round services for youth who are not in any "systems" with safety nets; and
- Requiring that WDBs use 25% of ARRA Youth funds for basic skills enhancement.

**Question II. Identify the Governor's key workforce investment system priorities for the state's workforce investment system and how each will lead to actualizing the Governor's vision for workforce and economic development. (§§111(d) and 112(a).)**

*In responding to this question, states should reflect on shifting priorities necessitated by the economic downturn and areas of focus for economic recovery. States should identify the Governor's key workforce investment priorities for the use of the Recovery Act funds infused into the state's workforce investment system and how each will lead to actualizing the Governor's new vision.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 3]

Governor Doyle's *Next Steps* strategies reflect a basic tenet that an educated and skilled workforce is essential to meeting the needs of business. Therefore, he has outlined activities that will make the public workforce development system more responsive for a competitive business climate along with improved accountability and transparency. In concert with the CWI, there will be an articulation of a statewide high-road sectoral economic and workforce development strategy, led by the Governor, and supported by other state activity and funding.

**The Governor's specific workforce priorities for 2009-10 are to:**

- Invest in state-wide skill assessment tools, work readiness certificates and career information efforts along with the expansion of Wisconsin's MSSC Program. As part of a systemic workforce system improvement, utilizing standards that are recognized nationally by industry will assist individuals' career pathways and employer's searching for workers;

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- Set industry-driven priorities for all training programs operated by the DWD, Commerce, Corrections, Children and Families and WTCS. This coordination effort will ensure that training programs are designed for, and responsive to, meeting the employment needs of the regional economic sector industries;
- Support partnerships between business and education through the (a) WTCS Workforce Advancement Training Program. This program establishes a mutual understanding of the types of skills and knowledge workers will need to fill available, good-paying job opportunities, and has already served 90 businesses with 11,900 trained workers; and (b) EISP grants to provide industry, technical colleges and WDBs with the ability to train people for good-paying jobs in the growing sectors of the economy such as biotechnology and renewable energy;
- Require regional strategic planning with multiple partners at the table that will transcend program boundaries for shared common goals, success metrics, improved alignment of workforce resources, and expansion of the *Next Steps* and WIRED agendas; and
- Expand the virtual job center, Job Center of Wisconsin (JCW). This continually evolving project is a convenient and fast way for employers to connect with the state's workforce. For job seekers, it provides easy access for job searches and other supports. In addition, work is underway to provide a career pathways guide in a variety of targeted high-wage, high-growth industries to better meet current and anticipated employment opportunities.

Since the development of the State Plan, the first phase of the National Governor's Association Center for Best Practices Policy Academy (NGA) work [III.C.I.; V.D.], **Governor Doyle rolled out the Wisconsin Sector Strategies Initiatives** to meet the following priority goals:

- Systemic infrastructure change for industry-driven regional planning and partnering for improved alignment of workforce and economic development resources;
- Shift training to on-the-job training and customized training, and other employer-directed training programs that will ensure appropriate skill-set attainment to match the employer's job needs;
- Facilitate educational stakeholders to align curriculum and programs to address industry needs;
- Increase business sustainability by reducing the risk of laying off employees or business closures; and,
- Increase participation in career pathways and life-long learning models.

When the economy begins to recover, the anticipated long-term goals include:

- Continue to upgrade skills of workers with new skills and technologies;
- Increase market penetration of WDB's local employer base and access to jobs that are vacated by incumbent workers advancing due to their increased skill levels; and,
- Meet industry needs to anticipate and address labor shortages.

The key industries priority for funding mirror the ARRA state target areas, and also reflect Wisconsin's historical strengths:

- Advanced Manufacturing
- Health Care/Life Sciences
- Building and Construction
- High Technology (examples include but are not limited to nano and bio technical industries)
- Advanced Agriculture
- Renewable Energy
- Environmental Technology
- Projects that promote "green" industries and/or the greening of industries

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If a region identifies a target industry outside of the above, the selection must be supported by an analysis of jobs and strong demonstration of industry leadership in that sector. The critical elements for implementing the Sector Strategy is as follows:

Industry Partnerships combine the industry leadership with support from multiple partners; workforce development organizations, educational institutions, training providers, industry and trade associations, organized labor, economic development, community-based organizations, local government agencies, and private foundations. The Industry Partnership Convener brings together the key groups and provides a means for an ongoing discussion of workforce needs and solutions to address a dual customer approach that helps connect and meet the needs of both workers and employers.

WDBs will be the recipient of funds and will be responsible for selecting a convener who will play a lead role in developing and maintaining the Industry Partnership through ongoing interaction with Industry Partnership members, as well as regional service provider networks, business and employee representatives. The evaluation and participation data will be the same as used for WIA and ARRA activities, in addition to other reporting requirements including best practices and lessons learned.

### ***Overarching State Strategies***

***Question V.B. What strategies are in place to address the national strategic direction discussed in [Section 4] of this guidance, the Governor's priorities, and the workforce development issues identified through the analysis of the State's economy and labor market? (§112(b)(4)(D) and 112(a).)***

*The state's response to this question should describe the state's key, actionable strategies it is deploying to achieve the Governor's vision for the use of Recovery Act and regular formula funds. ETA is interested in how the state is connecting and integrating recovery activities to ongoing workforce investments. The responses should provide actionable direction to local areas.*

- How workforce investment system resources, both stimulus and regular formula funds, can be deployed to serve increased numbers of workers in need.*
- How adults and dislocated workers, including low-income adults, who need to acquire new skills will have increased access to education and training opportunities.*
- How the state will address a dual-customer approach, meeting the skill needs of existing and emerging employers and high-growth occupations as well as the needs of under-skilled adults.*
- How workforce activities (e.g., adult education, job training, postsecondary education, registered apprenticeship, career advancement, needs based payments, and supportive service activities) will be aligned in career pathways both now in implementing the Recovery Act and in the transformed workforce system of the future.*
- How the state will partner to develop workforce solutions with community colleges, business and labor organizations, registered apprenticeship program sponsors, civic groups, and community organizations to align workforce development strategies and align workforce strategies with strategies for regional development and shared prosperity.*

[Wisconsin WIA State Plan Modification PY 09-10, State Partnership Systems References II; III.C.1; V.D.; Partnerships and alignment of workforce strategies are also referenced as part of GROW Regions and coordinated planning in sections 1.B; 1.C.; V.B; VII.D.2.; X.B; The ground-work for regional planning is referenced in VIII.D.2. Local Plan I.A.1.; 1.C.]

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DWD Secretary's Administrator's Memo Series, issued on April 16, 2009, provides the state's expectations for the Adult, Dislocated Worker and Youth programs with ARRA funds. [Attachment E, Administrator's Memo Series 09-01 and 09-02]

The Governor's Sector Strategy Initiative discussed in this document and Wisconsin's Plan Modification provides the next step to formalizing a business-driven workforce system with regional industry partners. Business leaders along with the Governor have made a commitment for the investment and implementation of regional industry partnerships, an approach that fosters worker training efficiencies and industry innovation. Additional coordination and better use of existing resources through realignment and strategic leveraging of regional efforts will best meet employer needs, ensuring that Wisconsin produces the most talented and skilled workforce in the country with a consistent workforce pipeline.

The Administrator's Memos addressed the expansion of reaching out and engaging targeted populations. The WDBs are encouraged to reach out broadly to engage other community partners and infuse other programs in providing referrals for possible participants in the Summer Youth Employment Programs. It is DWD's expectation that WDBs increase connections with the youth targeted populations, are informed of, and have the opportunity to participate in the program.

In the Administrator's Memo for Adult and Dislocated Worker programs, WDBs are strongly encouraged to use the technical colleges in their areas as key training providers as they expend ARRA funds on all types of training, including basic and occupational skills training. DWD also strongly encouraged working with the technical colleges as a key provider of curriculum development for new courses that will serve WIA-funded participants.

In addition, DWD encouraged the increased usage of supportive services and needs related payments in order to provide greater depth of support for participants.

### ***Service Delivery Strategies, Support for Training***

***Question IX.G. Describe innovative service delivery strategies the state has or is planning to undertake to maximize resources, increase service levels, improve service quality, achieve better integration or meet other key state goals. (§112(b)(17)(A).)***

*In answering this question, the state should describe innovative state strategies to accomplish the state's vision and achieve the goals of the Recovery Act, including how the state will:*

- *Increase services to workers in need.*
- *Support the full range of One-Stop Career Center customers in acquiring the skills needed to attain jobs in high-growth, high-wage industries and occupations, including such supports as needs-based payments, basic skills remediation, English as a second language, and supportive services.*
- *Ensure education and training delivered through the workforce system results in education and workforce skills of demonstrated value, and focus assessments and certifications towards the next level of education and employment.*
- *Strategically use youth, dislocated worker and adult statewide funds to quickly deliver innovative services.*
- *Provide targeted work experiences in order to prepare individuals for job opportunities in new industries or occupations, particularly using registered apprenticeship and on-the-job training for all jobseekers, and summer work experience for youth.*

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- *Align workforce activities with education strategies and economic and community development strategies to meet skill needs of jobs and industries important to the local and regional economies and meet the needs of under-skilled adults.*

[WIA State Plan Modification PY 09-10, page 72; ARRA Local Plan Guidelines # 31, 32, 33]

Wisconsin's State Plan highlighted a number of shifts that have taken place in the past year to introduce and/or strengthen service delivery strategies, increase partnering, and leverage resources. In summary, those included (and addressed elsewhere in this Addendum):

- Expand *JobCenterofWisconsin.com* to update services 24/7 for job seekers and employers, and increase transparency to the general public;
- Revise Job Center Standards for the One-Stop System;
- Re-station Job Service and Veterans staff in consolidated regional sites;
- Redirect funds for more emphasis on assessment and career advising with the intention of implementing across-programs common tools; and
- Formalize regional strategic planning.

Discretionary ARRA funding is targeted to continue to roll-out the Governor's major workforce initiatives: *GROW*, *RISE* and Sector Strategies. These initiatives have set the focus, and methods of operation, that are being infused in all WIA programming at the state and local levels.

**The ARRA funded additional services will also complement Governor Doyle's workforce training package** utilizing nearly \$6 million in **WIA discretionary funds**. The Governor announced on March 6, 2009, his regional approach that targets high-growth sectors, and prioritizes needs of workers to ensure business success in the future economy. The programs reflect a major change in the way the state and its partners will train workers for jobs of the future and meet the needs of employers in growing, emerging sectors.

**Wisconsin Sector Strategies Initiative:** This two-year kick-off with nearly \$ 3 million is an industry-driven regional focus that engages all the key players in understanding common industry needs and aligning resources to meet them. State Guidelines were issued to award \$490,000 in competitive grants as a first step in formalizing the leadership team of industry, labor, education, economic development and workforce development in the state's seven *GROW* regions. These partnerships will identify the workforce needs of high-growth sectors and develop strategies to meet those needs. The next step will be for industry-specific partnerships to seek grants that will leverage additional resources and fund the training of workers for jobs in demand. Some regions are already at this stage and grant funds will be provided for training immediately.

**Registered Apprenticeship** is integral to the state's future training strategies. It will be infused as an important skill development method in the Sector work, Career Pathways, WIA and ARRA activities. In addition to the Sectors Strategies Initiative, Governor Doyle announced funding to move forward efforts to ensure Wisconsin workers are prepared to succeed in tomorrow's economy. These initiatives that were proposed in the Governor's *Grow Wisconsin – The Next Steps* plan include:

- **\$1.5 million for Opportunity Grants:** The grants will help low-wage workers with no education or training beyond high school. The grants will let them improve their skills at technical colleges with short-term training that is not covered by financial aid. With the

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grants, low-wage workers can take steps to earn certificates or degrees and pursue career pathways to better jobs in advanced manufacturing, health care, biotechnology and other high-demand sectors.

- **\$300,000 for Skills Jump Start Grants:** The grants will help individuals who lack a high school diploma. They can complete their basic education, and at the same time, receive job training at technical colleges for employment in high-demand sectors, such as manufacturing and health care.
- **\$700,000 for Emerging Industries Skills Partnership:** A second round of grants to meet the workforce needs in advanced manufacturing, biotechnology and renewable energy.
- **\$85,000 for Manufacturing Skill Standards Certification.** The funding will support assessment efforts and encourage enrollment. The Governor has set a goal of having 40 percent of our production workers earn MSSC credentials by 2016.
- **\$175,000 for Skills Assessment and Work Readiness Certification.** This funding will support pilot projects to develop a standard method to assess the skills of job seekers and certify them as job ready.
- **\$140,000 for Career 101 Pilots.** The funding will help school districts establish pilots that more effectively inform students of career opportunities in high demand occupations and help them chart a course to achieve their career goals.

### **Section II. Service Delivery**

#### ***State Governance and Collaboration***

***Question III.A.2. Describe how the agencies involved in the workforce investment system interrelate on workforce, economic development, and education issues and the respective lines of authority. (§112(b)(8)(A).)***

*In responding to this question, the state should describe how the Governor is ensuring cross-agency collaboration so that workforce investments are fully tied to other investments funded by the Recovery Act outside of workforce development.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 4]

The Governor established the Governor's Office of Recovery Website that serves as the electronic cross-agency collaboration tool. This provides extensive information that is continually updated on the interwoven activities of state agencies. In addition, the DWD Secretary has also held ARRA Feedback Sessions in order to gather input and coordinate responsive action.

The Governor has directed the state's cabinet to develop cross-agency systemic coordination, and target the same industry priorities for an improved talent pipeline. In addition, the Governor has directed other training activities of the Department of Children and Families (DCF) responsible for Wisconsin Works (W-2)/Temporary Assistance for Needy Families and the Department of Corrections (DOC) to move toward high-skilled demand occupations in their workforce-related training programs. DCF has an oversight group of partners from across the state that meets monthly and invites representative from other departments to those meetings for cross-program coordination. For example, the DWD Division of Employment and Training (DET) Administrator keeps DCF abreast of workforce system and programmatic issues.

The Governor's Executive Order # 278 on creation of job opportunities includes all state agencies and any related vendors: directs "all Executive Branch agencies to include in all contracts funded, in whole or in part, by the American Recovery and Reinvestment Act of 2009,

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for which the invitations for bids or other solicitations for bids are published on or after February 17, 2009, a clause requiring contractors and subcontractors to ARRA-funded state contracts who employ workers in Wisconsin to post job openings created by ARRA-funded state contracts on the JobCenterOfWisconsin.com website."

Wisconsin's project with the NGA Center for Best Practices Policy Academy has provided a major forum for state collaboration. Governor Doyle's designated team of senior leaders was recognized by the Policy Academy as being uniquely positioned to develop and implement substantial changes in policies and practices to address workforce needs. Core team members include Secretaries and staff from DWD, Department of Commerce (Commerce), DPI, WTCS, as well as representatives from the local boards, labor organizations, private employers, independent colleges and the UW-Center on Wisconsin Strategy.

Specifically with ARRA funds, DWD will explore expansion of partnerships with DOC and DHS Older Worker Programs to include:

- Continued use of the fidelity bond program that benefits all individuals with barriers to employment including ongoing training;
- Systemic implementation of blending and braiding of funds with WIA to develop additional programs and resources at the pre-release phase of offenders;
- Joint education for agencies and the employment community on hiring individuals with barriers to employment;
- Sustained coordinated strategies to work with the business community; and
- DWD engagement with DHS on the development of the Title V State Plan.

See III.C.1. below for further discussion.

***Question III.C.1. Describe the steps the state will take to improve operational collaboration of the workforce investment activities and other related activities and programs outlined in section 112(b)(8)(A) of WIA, at both the state and local level (e.g., joint activities, memoranda of understanding, planned mergers, coordinated policies, etc.). How will the State Board and agencies eliminate any existing state-level barriers to coordination? (§§111(d)(2) and 112(b)(8)(A).)***

*In responding to this question, states should describe how collaboration will be supported and sustained between state agencies, particularly between the organizational entities responsible for WIA, Wagner-Peyser Act, Unemployment Insurance, Trade Act services, and Registered Apprenticeship.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 7]

Since taking office, Governor Doyle has worked to strengthen regional workforce and economic development efforts throughout the state recognizing that the economy is not confined to geographic boundaries. Region-wide workforce system integration and coordination with major economic development and education entities formally began with the CWI creation of the seven *Grow* regions for improved regional partner strategic planning, employer-linkage activities and industry cluster efforts. Governor Doyle has made a commitment to align funding from multiple state agency programs with the *Grow* regions in order to maximize coordination and impacts. This operational shift recognizes that the regional economies must drive their skills analysis, identify training needs and training resources, and that employers must be at the center of identifying needs along with ensuring that the publicly-funded agencies adapt to those needs.

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The Governor has begun to implement coordinated planning by the following activities:

- Collaborative state-level cooperative agreements among cabinet agencies;
- Development of common workforce goals among multiple state and local government and non-governmental organizations;
- Produce a state-wide report on state agency system functions and progress in cross-agency planning, policy coordination and program implementation;
- Produce an annual report showing results of state, federal and non-governmental organizations investments for improved accountability; and,
- Formalize and implement regional metrics.

The **Governor's Office of Recovery and Reinvestment website** includes all affected state agencies with a contact person, lists of related programs and other cross-agency efforts. In addition, he established a cross-agency team that met regularly during ARRA start-up.

The DWD Secretary also established the **DWD ARRA website** <http://dwd.wisconsin.gov/recovery/> for internal/external coordination and public transparency purposes.

The DWD Secretary immediately put into place an internal **DWD Recovery and Reinvestment Task Force** with its charge to:

- Coordinate, plan and implement the ARRA resources that will be managed by DWD.
- To make effective use of federal dollars in order to create and maintain jobs, jump-start the economy, and invest in long-term economic strategies.

The DWD Task Force is led by the Secretary's staff with the Chairs of each workgroup serving on the steering committee as well as other technical advisors. The steering committee has been meeting weekly and receives reports on each workgroup's progress. The organizational entities included in the list below are all housed within DWD:

- Labor Exchange Profiling
- Re-employment Services
- WIA Adult and Dislocated Worker
- WIA Youth
- Labor Exchange, Accountability, Data and Reporting
- DOL Competitive Grants
- Unemployment Modernization
- Extended Unemployment Compensation Benefits Extension
- Increased Weekly Benefits
- Vocational Rehabilitation

DWD initiated legislative changes regarding Unemployment Insurance (UI). The UI Advisory Council determined what sections of the UI Modernization Act to pursue to be serve Wisconsinites. In May, the State Legislature passed and the Governor signed into law Wisconsin Act 11 that will now allow a UI-approved training with specific requirements that must be met for an additional 26 weeks of UI benefits. The DWD Secretary issued a letter to prospective eligible claimants that included information with a newly established 888 number and additional information including the [www.opportunity.gov](http://www.opportunity.gov) website.

The DWD Secretary also held an apprenticeship conference on January 26, 2009, in order to highlight a model that would help the state move into economic recovery by providing skilled

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workers needed for growth. In addition to multiple state agency partners engagement, there were 44 exhibitors with up to 450 high school students who visited booths and learned about careers in skilled trades.

DWD is sponsoring an Action Clinic among workforce partners to continue with the integration of apprenticeship with the workforce system. Participants include workforce development boards and staff, apprenticeship sponsors, members from the technical college system and apprenticeship staff. Communication will continue after the Clinic for educational sessions with Job Center staff.

### ***Reemployment Services and Wagner-Peyser Act Services***

***Question IX.C.4.b. Describe the reemployment services the state provides to Unemployment Insurance claimants and the worker profiling services provided to claimants identified as most likely to exhaust their Unemployment Insurance benefits in accordance with section 3(c)(3) of the Wagner-Peyser Act. (§112(b)(17)(A)(iv).)***

*In responding to this question, states should describe:*

- *The Governor's vision for Reemployment Services (RES), including how they differ from Wagner-Peyser core services.*
- *How RES will be coordinated with other services provided at the One-Stop Career Center under WIA.*
- *How UI claimants will be identified quickly and RES provided as early as possible following initial receipt of UI benefits or referrals through UI profiling systems.*
- *The services that will be provided under RES, including in-depth services such as skill assessment, career guidance, individual service plans, and labor market information.*
- *The specific population among UI claimants (e.g., those most likely to exhaust benefits) that the state intends to target with Recovery Act funds for RES.*
- *How the state intends to integrate information technology into its RES program to better identify and serve UI claimants, including the percentage of funds that will be used for integrating ES and UI technology requirements to identify and serve the needs of UI claimants*
- *Any labor market information tools that will be funded and integrated into RES.*

[WIA State Plan Modification page 54]

Wisconsin is implementing an **expanded Statewide RES initiative** that will have Job Service staff provide a comprehensive orientation session for claimants, not only at the current 22 Job Service staffed Job Center sites, but at additional access points statewide. [Attachments F and G] This effort will result in services being provided at 83 additional sites statewide. The orientations will provide information on One Stop programs and services, current labor market information, and will include both group and individual discussion with the claimants through a triage process that determines if a person is job ready, or needs referring to a partner training program, and/or referral to newly developed soft and hard skill assessment services or group counseling services. The outreach, and the detailed assessment and counseling services are not currently part of the Wagner Peyser core services.

As claimants participate in these sessions, the workshop presenter will be using a combination of a common intake form, group and individual discussion, and a counseling questionnaire, to determine appropriate referrals for these claimants. The expectation is to serve an additional 10,000 claimants per month as part of the ARRA RES efforts which will result in significant referrals to one stop partners for additional services. Many of these will be direct referrals to

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WIA Title 1, DVR, Veteran Services, Adult Basic Education, high school equivalent certificates and County services.

The additional sites statewide have been arranged to conduct RES sessions that will have a large number of existing and new staff providing these RES services as part of ARRA funding. With these strategies, there will be a closer working relationship with UI to serve a significantly larger number of UI claimants. The UI profiling formulae has not been changed as current formulae already provide a probability factor to determine those customers most likely to exhaust their benefits. There is coordination with UI for workshops populated with claimant names. In the past, RES customers come into the sessions within 5 weeks of receipt of their first UI check if they were placed in the RES pool.

Claimants will now be kept in the pool longer (for 13 weeks) since most qualify for extended benefits. Emphasis continues to get customers into the sessions quickly, and at the same time, ensuring that customers do not get removed from the applicant pool too soon.

With the new initiatives, customers will receive extension information and services. All RES attendees will be required to register on JobCenterofWisconsin, and develop a resume for that system. Additionally, while attending the orientation session, the presenter will give detailed information on One Stop programs and services, current Labor Market information, set aside one-on-one time with each claimant to review their case, and will conduct a triage approach to determine appropriate next steps for the claimant. Those determined job ready will have their resume reviewed, and will be served through the Job Center resource room. New soft and hard skills assessments will be introduced in large part to measure their math, reading, and locating information skills. These hard skill assessments will result in a Career Readiness certificate that the claimant can use as part of their job search. Some customers will be referred for intensive group counseling sessions with the Job Service employment counselor. Anyone determined in need of retraining will be formally referred to other providers including for WIA Title 1 and VR services and other co-enrollments.

The current formula for RES establishes a ranking that determines the likelihood that a claimant will exhaust their benefits, and traditionally we have only served those claimants with the highest probabilities. (The current formula considers things such as years of work history, occupation they've been laid off from, education levels, etc) In the new program, as part of ARRA initiatives, claimants will be served at both ends of this ranking so that a determination can be made of outcomes for how RES services help people at different ends of this spectrum.

The JCW provides all job listings, and offers resume, application and employment reference documents. This system allows both job seekers and employers to do job and resume profile matching, using key word functionality. RES customers will be required to register on this system and create their resume on this site. The RES scheduling system and efforts is a combined effort with the UI system. UI will be updating their system to accommodate many additional sites and scheduling features in order to serve a larger number of claimants.

ARRA RES funds will be used to acquire new hard skill assessment tools. Some of these tools include a variety of labor market information links. There will continue to be licensing for a Wisconsin system called WisCareers, which provides detailed occupational and education information in Wisconsin. Workshop presenters will also be educating claimants on JCW that provides detailed labor market information including occupational information for demand jobs, jobs that are in decline, educational requirements for different jobs, wage information and projected occupational growth statistics.

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**Question IX.C.1.b. Describe how the State will ensure the three-tiered service delivery strategy for labor exchange services for job seekers and employers authorized by the Wagner-Peyser Act includes: (1) self-service, (2) facilitated self-help service, and (3) staff-assisted service, and is accessible and available to all customers at the local level. (§112(b)(17)(a)(i).)**

*In order to ensure that jobs generated through the Recovery Act are accessible and available to all customers, describe how the state will facilitate the listing of such jobs on the State Job Bank.*

[WIA State Plan Modification PY 09- 10, page 46]

Governor Doyle's Executive Order # 278 requires that all ARRA-funded jobs be listed on JCW. Programming changes are being made in JCW so that those jobs will be trackable for separate reporting purposes. In Wisconsin, all Job Service staff are fully integrated into One-Stop facilities that manage and provide core and intensive services to job seekers, and recruitment services, including job order servicing, to businesses. This field structure is connected to and supported by new technologies including the JCW site and the statewide call center operation. This allows Job Service operated public labor exchange information-brokering services to be readily and easily accessible to businesses and job seekers wherever they can access the Internet.

**Self Service:** In Job Centers, self-service occurs for job seekers who visit the Resource Room and choose to use electronic tools, primarily our new electronic labor exchange system, the JCW, as well as available hard copy materials without consulting staff. Here, jobseekers can begin the process of talent and skill development, including: exploring careers, learning about trainings, and reviewing job opportunities. JCW also allows a growing number of citizens to access the system at anytime, from anywhere, and to not only search for jobs but also post their resume. JCW also provides the business community with the ability to directly enter job postings for recruitment, and offers the new feature of resume search.

### **Facilitated Self Help**

**For Job Seekers:** Resource Rooms are the setting for facilitated self help in Wisconsin's Job Centers. Job Service is the lead agency and primary provider of Resource Room services. Customer service representatives in the Resource Room who are computer literate; have comprehensive knowledge of the local labor market; understand career planning; are proficient in successful job search strategies and recognize potential eligibility for other One-Stop system services; direct job seekers' attention to jobs for which they may be qualified and make referrals as appropriate based on their knowledge of the labor market in general and specific listings that reflect current recruitment activities; and share their expertise with customers and, in return, customers keep staff knowledgeable about who is looking for work and how best to present job opportunities.

Job Service is working on enhancing the resource room experience, including a much stronger focus on staff assisted assessment. In addition to the resource room, Job Service is offering a statewide call center for jobseeker assistance. This allows jobseekers who need additional assistance with services or the new JCW to call a toll free number and access the assistance they need.

**For Business:** Job Service functions as a provider of high volume recruitment services to the business community. Job Service provides job orders that are displayed on the JCW. This

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service is provided entirely via a statewide call center which has improved service consistency and efficiency. In addition to job order processing and business assistance with JCW, staff who provide business services may:

- Lead and assist with the development of job fairs;
- Provide businesses with recruitment services, as well as related staff and partner training; and
- Offer facilitated self-help to businesses that list their own job orders on a direct entry system.

### **Staff-Assisted Service**

**For Job Seekers.** Declining Wagner-Peyser funding continues to impact the availability of staff-assisted services beyond the Resource Room. Because of that, Job Service embarked upon an effort to consolidate its staff into 22 Job Center locations in 2008. Those changes have allowed Job Service to strengthen resource room services, operate the call center, and focus more attention on staff assisted services, such as:

- Reemployment Services to UI claimants, in collaboration with local partners;
- Job search and career planning workshops for the general public; and
- Employment counseling and testing, which are highly valued by customers, and important to addressing vocational choice, change, and adjustment faced by Dislocated Workers (DW), youth and older workers. This service is of great value to businesses for recruitment, and as a direct service to their establishments in matters of workforce retention, particularly during this time of labor shortages.

**For Business.** Job Service staff will assist with the labor exchange services of: recruitment planning; information brokering; screening and referral; quality job order writing, and talent development and retention strategies. Job Service continues to work with partners to secure the business of employers, facilitate jobseeker employment, and achieve the "bottom line" goals of One Stop network of programs operated by Job Service.

### **Adult and Dislocated Worker Services**

**Question IX.C.1.a. Describe state strategies and policies to ensure adults and dislocated workers have universal access to the minimum required core services as described in §134(d)(2).**

*In its response, the state should address core services for adults, dislocated workers, and target populations, especially those given preference in the WIA Adult program in the Recovery Act – recipients of public assistance and other low-income individuals.*

[WIA State Plan PY 09-10, Page 45]

The Administrators Memos, 09-01 and 09-02, places an emphasis on services to recipients of public assistance and other low-income individuals. WDBs are encouraged to use funds "on services that most efficiently and effectively assist workers affected by the current economy to obtain employment, with priority given to public assistance recipients and other low income individuals." "The State continues to emphasize "universal access" provisions of WIA in order to meet the needs of persons with disabilities, persons in correctional facilities, and other marginalized individuals." For youth, the state guidance includes the targeted populations of veterans, low income and W-2 eligible individuals, apprentices, youth with disabilities, juvenile offenders and out-of-school youth.

In addition, all WDBs have local policies on priority of service, needs related payments and supportive services. Further detail from WDBs will be garnered from their ARRA local plans.

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The Opportunities Grants will assist low-wage workers currently not eligible for technical college financial aid to upgrade their skills. This and other strategies the Governor has recently incorporated into his workforce priorities, will assist the "working poor" to receive quality training and employment placement for family-sustaining wages with career advancement.

On May 4, 2009, Governor Doyle announced a \$600,500 Joyce Foundation grant that will reduce poverty by helping low-wage workers learn new skills and get better jobs in high growth sectors. As referenced earlier, the RISE partnership initiative between DWD and WTCS is part of the multi-pronged approach to prepare Wisconsin workers and businesses to succeed in the future economy. The initiative is intended to serve roughly 723,000 workers statewide who have a high school degree or less. This thrust will significantly address the assessment that two of three jobs available today will require more education in the future.

While the State infused new efforts for increasing training access, equally as important is the need for more in-depth, one-on-one services for those who need additional support or lengthier training. This is particularly necessitated because Wisconsin has a high labor force participation rate. As a consequence, one of the most important workforce development issues is attracting and retaining more non-traditional labor in the workforce. This includes minority workers, migrants, persons with disabilities, and persons with problem civil and job histories. Often this means addressing the multiple barriers for successful training and employment placement such as transportation, childcare, education and training in both technical and soft skills. Secondly, many of the job losses will warrant unemployed workers to seek entirely different careers requiring substantially more training to meet new job requirements.

In addition, the connection of workforce development to economic development has been identified as the major issue for Wisconsin's future economic success. Increased demand for higher skilled workers will require additional education and training. The need is for economic development and the workforce development communities to form partnerships and collaboratives that recognize and utilize the hidden workforce (older workers, immigrants, persons with disabilities, etcetera).

In summary, through extensive partnerships, the State has instituted measures that will substantially increase the number of opportunities for training. At the same time, the emphasis will be on providing optimal training opportunities that meet the skills needs for employers.

***Question IX.C.1.c. Describe how the state will integrate resources provided under the Wagner-Peyser Act and WIA Title I for adults and dislocated workers, as well as resources provided by required One-Stop partner programs, to deliver core services. (§112(b)(17)(a)(i).)***

*In its response, the state should address how it will integrate resources provided under the Recovery Act, the Wagner-Peyser Act, and WIA Title I for adults and dislocated workers, as well as resources provided by required One-Stop partner programs. For example, how will the state use these resources to provide significant funding for low-income and low-skilled workers that help them access the services and training needed to pursue family-supporting jobs.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 48]

With receipt of ARRA Wagner Peyser and RES funds, Job Service will have 50 new project staff to provide a greatly expanded network of RES sessions statewide, while at the same time allowing for more job seeking workshops, new soft and hard skill assessment strategies and

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more emphasis on business services. These will be done at the local level in a coordinated fashion with the One-Stop network partners.

DWD requires each WDB to develop an area-wide plan and strategy that outlines how partner agencies will use resources to meet the individual business, and economic growth needs of the area by employing a system-based, regional approach. Within Job Centers, resource integration is managed through One Stop Operators and tools such as Memoranda of Understanding (MOU), Operating Agreements and Facilities Plans. Job Service continues to wear multiple hats, and ensures that all Wagner-Peyser activities are fully integrated into the WIA planning process, local decision-making, and Job Center service delivery.

***Question IX.C.3.a. Describe the Governor's vision for increasing training access and opportunities for individuals including the investment of WIA Title I funds and the leveraging of other funds and resources. (§112(b)(17)(a)(i).)***

*In its response, the state should describe how the state will increase training access and opportunities for individuals, including the investment of WIA Title I funds and Recovery Act funds, and the leveraging of other funds and resources. How will the state use contracts with institutions of higher education and other training providers (as described in Section 6 of this TEGL) to maximize funds to the greatest benefit?*

[WIA State Plan Modification PY 09-10 Identifies state policy direction on expanded training services IX.C. 3. a; IX.C.3.b.ii; IX.C.3.d.i. Identifies more focused expansion of services IV.I and IX.C. 4.f.; ARRA Local Plan Guidelines II.D. 4. Page 5]

DWD Administrator Memo 09-02 emphasized that training would be the primary area of focus with overall enrollments in training expected to increase significantly. For ARRA Adult and Dislocated Worker funds, 70% must be spent on training. Wisconsin's State Plan PY 09-10 also noted that WDBs will be required to spend 35% of formula funds in Adult, Dislocated Worker and Special Response funds on training. Existing policy also establishes that approved training programs will lead to demand occupations. For ARRA youth funds, WDBs must spend at least 25% on training with a focus on Adult Basic Education, alternative high school equivalent training, or work readiness certification activities.

The ARRA Local Plan Guidelines include a section on the State's training priorities and provides further guidance on expectations. The WDBs maintain positive working relationships with the training providers serving their respective market areas. Course content and other captured data elements are updated as received from the WDBs, or directly from training provider representatives. Distance learning opportunities, especially from out-of-state providers, pose unique challenges to a system developed to service training exchanges within intra-state markets. However, Wisconsin is well positioned to protect both its training seekers and its approved institutions through the qualified assistance of the Wisconsin Educational Approval Board.

### **Higher Education and Other Training Contracts**

The Administrator's Memo 9-02 emphasizes the use of contracts with the Wisconsin Technical Colleges as key training providers as they expend ARRA funds on all types of training, including basic and occupational skills training. As provided in TEGL 14-08, the Memo specifies that "WDBs may pay the full cost of training funded with ARRA dollars. Therefore, costs for hiring additional instructors to provide group training are allowable, and so when necessary, WDBs may cover these costs to facilitate expedited training delivery for WIA-funded participants." Also reinforced in the TEGL, the Memo encourages the use of ARRA funds for "curriculum

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development by an eligible training provider if the curriculum is for emerging sectors and enhances the capacity of the institutions to ensure quality training within limited timeframes and is in the context of providing training to WIA participants. Curriculum activities should focus on adapting existing or creating new curriculum that will result in a short-term increase in accelerated training capacity."

In the first quarter of 2009, there was an average increase of 54 new course offerings approved per month. Projected annually, this will be a 385% increase over new course totals received in calendar year 2008.

The University of Wisconsin System two-year institutions are also responding to the urgency of this situation. Their participation at the state and local levels already has included adding classes, creating new program classes and changing curricula.

Given classroom space constraints, as well as expanding an existing successful model, DWD will further advance adult apprenticeship. The CWI received an update on adult apprenticeship at their March 27, 2009 meeting which resulted in the consensus conclusion that "apprenticeship activities needed to increase to the scale of the potential workforce pool." In addition, WTCS is the main provider of related instruction for apprenticeship. This partnership is vital to the success of the state's apprenticeship program.

Another focused strategy to increase training options are the State's new waiver requests on customized training and on-the-job training, and the continuation of the use of up to 10% of WDB formula funds to provide incumbent worker training. The purpose of these is to expand the flexibility of WDBs to better address the needs of under-employed and unemployed persons as well as provide skills upgrade needs of employed workers.

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### Governor's Initiatives

The Governor's Workforce Initiatives discussed earlier set the orientation for all WIA programming. In terms of training, this means that as WDBs shape their training emphasis, they will be targeting their funding in demand occupations in a regionally defined selected sector. The training itself is encouraged to be delivered in a chunked fashion, i.e. Enough training should be provided to enable entry level placement but a second, third, or even fourth chunk be available to allow the person to advance to positions within the occupation. This is a key focus for **Career Pathways** as a strategy within **RISE**. Pathways is a competency-based training that is responsive to employee workforce skill training needs and emerging economic development efforts.

The state's planned outcomes for RISE are:

- Higher number of low-income working adults enrolled in post-secondary education;
- Higher proportion of lower-skill adult learners transition into and complete associate degrees, technical diplomas, and/or certificates;
- Higher proportion of low-income working adults attain degrees, technical diplomas, and/or certificates; and,
- Increases in earnings and job quality.

The state's outcomes for new Pathways to the middle class are:

- Entry-level jobs that connect workers to future opportunities;
- Reliable and easy-to-understand ways to build skills and earn better pay;
- Lifelong learning in doable increments; and
- Sectors offering jobs with career potential.

The **Sector Initiative** will be the basis for a responsive training system that will address the needs of both employers and the workforce inter-dependently. Complementing the CWI's recommendations, the Governor's vision includes:

- One-Stop system alignment of training initiatives and ITAs to sector strategies and demand occupations;
- Development of more career pathways and "bridge" programs to support the skills advancement of working adults;
- Establishment of pilots on the appropriate tools to increase the awareness and interest in demand occupation employment opportunities available in the region and the pathways to achieving employment;
- Increased emphasis on offender reentry training and job obtainment to ensure that every available worker is tapped for the jobs of the future;
- Increased focus on accelerated training and occupational skills training;
- Coordination with non-WIA funded training programs operated through other state agencies with a focus on high-skilled demand occupations; and
- WDBs will be required to spend 35% of Adult, Dislocated Worker and Special Response funds on training in accordance with DWD guidance.

The Governor is also committed to increasing specialized training using the successful models from the **Wisconsin Regional Training Partnership** (WRTP). WRTP has demonstrated effective training methods in multiple industry sectors in tandem with labor unions. Their Center of Excellence for skilled trades and industries is another nationally-recognized model for other areas to replicate.

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Another focused state-wide training effort is through the DHS' Medicaid Infrastructure Grant (MIG) that includes a variety of activities have occurred with braided funding. On April 22, 2009, awards for *Pathways to Independence* grants were announced in an effort to help increase the number of integrated employment opportunities available to people with disabilities. The leveraging will augment current training opportunities, with diverse providers, and at venues outside of the traditional workforce system. Examples of innovative projects that will assist individuals with disabilities to secure and maintain competitive employment include:

- Marathon County, Community Industries Corporation - Supported employment services to facilitate the participation in integrated employment of Hmong and Southeast Asian individuals with disabilities;
- Milwaukee, Grand Avenue Club - Expand capacity to place and assist persons with mental health disabilities to increase their earned income;
- Pierce County, Ellsworth Community School District - Acquire meaningful work experience and acquire skills for employment through school-based and community-based businesses that provide various opportunities for students with disabilities.

***Question IX.A.5. What models/templates/approaches does the state recommend and/or mandate for service delivery in the One-Stop Career Centers? For example, do all One-Stop Career Centers have a uniform method of organizing their service delivery to business customers? Is there a common individual assessment process utilized in every One-Stop Career Center? Are all One-Stop Career Centers required to have a resource center that is open to anyone? (§§112(b)(2) and 111(d)(2).)***

*In its response, the state should describe its models/templates/approaches for service delivery in the One-Stop Career Centers, particularly whether the state is adjusting its approach to deliver increased levels of services with funds received under the Recovery Act.*

- *Do all One-Stop Career Centers have a uniform method of organizing their service delivery to business customers?*
- *Is there a common individual assessment process utilized in every One-Stop Career Center?*
- *What approaches will be used to ensure funds are targeted to those most in need, including low-income, public assistance recipients, persons with disabilities, etc.?*
- *How will states streamline the sequence of service to facilitate individual access to needed services and training?*

Per the Sections on Reemployment Services, the program will use a common in-take process that will be user friendly for all customers. Currently there is not a common individual assessment statewide. However, a common assessment tool statewide is one of the workforce goals for this program year.

The state has Job Center Standards (attachment L in the Wisconsin WIA Plan Modification) that are requirements for service delivery in the One-Stop network. The business-driven industry partner effort, discussed throughout both documents, will design regional service delivery to improve meeting business customers. In addition, every WDB has a Business Team for staff to have clear coordination and outreach roles with the private sector. Finally, the WDB Executive Director's organization, Wisconsin Association of Job Training Executives, has established a subgroup of business relations people to review best practices and make services consistent across the state.

Priority of services to targeted populations is discussed in the Administrator's Memos and highlighted in IX.C.1.a.

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The sequence of service is addressed in state policy Administrator's Memo 09-02: Determination of the core/intensive/training service provisions does "not mean that the individual must go through layers of service to prove that need: the determination of need itself can be a core and/or intensive service, such as assessment, or development of an Individual Employment Plan. Thus, a caseworker could initially meet with a participant, assess his or her skills, and consider labor market conditions, and determine that core or intensive services will not be sufficient to result in employment for the participant. The provision of training or other needed services can then be provided sequentially, concurrently, or in whatever order makes the most sense for the individual."

### **Youth Services**

#### **Question IX.E.1. Describe the state's strategy for providing comprehensive, integrated services to eligible youth, including those most in need. (§112(b)(18).)**

*In responding to this question, the state should include the following:*

- *Describe the anticipated program design for the WIA Youth funds provided under the Recovery Act. Include in this description a program design for both younger, in-school, and older or out-of-school youth (including the 22-24 year olds that can be served with Recovery Act funds).*

DWD has directed the WDBs to provide opportunities for summer employment, in addition to year round activities with ARRA funds. The intent is to expand the number of youth who are being served and to engage with workforce partners to ensure that veterans, low income and TANF eligible, youth with disabilities, juvenile offenders, youth apprenticeship, pre-apprenticeship program participants, and out of school youth are engaged in activities with this funding.

For older and out-of-school youth who are not returning to school following the summer months, DWD has directed the WDBs to consider work experiences and other appropriate activities beyond the summer months including training opportunities and reconnecting youth to academic options through multiple education pathways. The use of the career pathway model within the RISE initiative is an integral part of this effort.

DWD has directed WDBs to expend 70% of the ARRA Youth funds for summer employment activities by October 1, 2009, with the remainder of the funding to be used by June 30, 2010. DWD has allocated the funds to the WDBs to administer summer youth employment opportunities.

DWD has directed the WDBs to use existing community resources such as the Youth Apprenticeship program, Boys and Girls Clubs, Urban League, Community Action Agencies, YouthBuild, Veterans' Programs, Pre-Apprenticeship/Wisconsin Regional Training Partnership for referrals and private and public employer connections. WDBs may use a combination of public sector, private sector, and non-profit summer employment opportunities. In addition, WDBs were directed to ensure that the work experience for participants results in increased work readiness skills for participants. For older and out-of-school youth, DWD has directed the WDBs to consider work experiences and other appropriate activities beyond the summer months including training opportunities and reconnecting to academic opportunities through multiple education pathways particularly using the career pathway model. The career pathway is a new way of organizing a postsecondary program as a sequence of modules that leads learners in steps toward a degree or technical diploma.

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For out-of-school youth and older youth (18 to 24), DWD has directed WDBs to spend at least 25% of their ARRA Youth funds on training with a focus on Adult Basic Education, GED or HSED training, or work readiness certification activities. DWD's emphasis with this guidance is that WDBs will prepare these participants for movement into unsubsidized employment as the economy improves.

The state utilizes WIA policy related to supportive services and needs related payments which could include day care. Each WDB has their own local policies on supportive services and needs related payments. For older youth (18 to 24), WDBs will need to determine after the summer period, whether to continue to engage the youth only in work experience activities for which they will continue to receive a stipend or a paycheck, or, transfer them to the Adult Program and/or co-enroll with other programs.

In this ARRA Addendum, the State is requesting a waiver on the youth performance measures for out-of-school youth ages 18 to 24 served with ARRA funds beyond the summer months who participate in work experience only. This will allow the use of the work readiness indicator as the only indicator of performance for these youth, the same measure that applies to summer only youth participants. The waiver would only be applicable for the first six months following the summer of 2009.

The WDBs ARRA local plans identified serving an anticipated statewide total of 5,667 youth ages 14 to 24 in the summer youth employment program. Administrator's Memo 09-01 further details DWD's state policy and guidance to WDBs for ARRA and WIA youth funds.

### ***Veterans' Priority of Service***

***Question IX.C.5.b. What policies and strategies does the state have in place to ensure that, pursuant to the Jobs for Veterans Act (P.L. 107-288) (38 USC 4215), priority of service is provided to veterans (and certain spouses) who otherwise meet the eligibility requirements for all employment and training programs funded by the Department of Labor?***

*In answering this question, the state should outline the changes to state and local policies and strategies that make them sufficient to meet the requirements of 20 CFR 1010.230, published at 73 Fed. Reg. 78132 on December 19, 2008, of the Jobs for Veterans Act regulations issued on December 19, 2008 implementing priority of service for veterans and eligible spouses in Department of Labor job training programs. This includes providing the following information and/or attachments to the State Plan modification:*

- *A description of the changes to policies for the delivery of priority of service by the State Workforce Agency or Agencies, Local Workforce Investment Boards, and One-Stop Career Centers for all qualified job training programs delivered through the state's workforce system. The description must include how:
  1. *The state policies ensure that covered persons are identified at the point of entry and*
  2. *given an opportunity to take full advantage of priority of service.*
  3. *The state policies ensure that covered persons are aware of:*
    - a. *Their entitlement to priority of service;*
    - b. *The full array of employment, training, and placement services available under priority of service; and*
    - c. *Any applicable eligibility requirements for those programs and/ or services.**
- *A description or copy of the state's policy requiring Local Workforce Investment Boards to develop and include policies in their Local Plan to implement priority of service for the local One-Stop Career Centers and for service delivery by local workforce preparation and training providers.*

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[Wisconsin WIA State Plan Modification PY 09-10, Page 61]

The state first provided guidance to the WDBs regarding the Veterans Priority provisions by publishing Veterans Priority Letter (VPL) 1-05, dated April 13, 2005. This VPL provided the policy requirements as outlined in TEGL 05-03, which was issued by DOL to implement the Jobs for Veterans Act. The VPL provided specific guidance to each program area within the WDBs. In addition, the state published another VPL, 1-07, dated March 19, 2007, Implementation of Veterans Performance Goals for all DOL funded programs. This VPL established minimum performance goals as outlined in the TEGL 05-03, issued by DOL to implement the veterans' priority provision of the Jobs for Veterans Act. The state published VPL, 2-09, June 1, 2009, Final Rule on the implementation of Veteran's Priority of Service and Performance Goals for all DOL and the Recovery Act funded programs. [Attachment H] This VPL summarizes and gives specific guidance regarding 'Priority of Service for Covered Person', Final Rule, 20 CFR 1010 published in Federal Register 78132, December 19, 2008. In addition, the VPL also provides guidance and direction regarding the American Recovery and Reinvestment Act of 2009.

### References:

- VPL 2-09, dated May 28, 2009: Final Rule on the implementation of Veteran's Priority of Service and Performance Goals for all DOL and the Recovery Act funded programs.
- VPL 1-07, dated March 19, 2007: Implementation of Veteran's Priority Performance Goals for all DOL funded programs.
- VPL 1-05, dated April 13, 2005: Implementing the Veterans Priority Provisions of the "Jobs for Veterans Act" (P.L. 107-288) (guidance and requirements by Program Area)

DET conducts an annual review in determining if each WDB is meeting their requirements regarding the Jobs for Veterans Act, Priority of Service for veterans and eligible spouses. This year's monitoring guide will include additional inquiry including the following:

1. What is the process you use to identify Veterans and eligible spouses coming into the one-stop system?
2. What is the process you use to inform Veterans and eligible spouses coming into the one-stop system of their entitlement to priority of service?
3. What is the process you use to assess the needs of Veterans and eligible spouses seeking service through WIA/ARRA, and how are Veterans and eligible spouses identified with a barrier to employment?
4. What is the process used for referring Veterans and eligible spouses to appropriate program staff, or in the case of a Veteran or eligible spouse with an employment barrier, to the local Veterans Employment Representative, and co-enrolment?

In addition, as part of the review with each of the WDBs, determination will be made regarding the priority of service by training type and by low income. VPL 1-07 Provides guidance to each WDB on recommended minimum performance goals and guidance in order to comply with Priority of Service for Veterans. Established goals are based on the incidence of the veteran population 18-64 (as a percent of the total population age 18-64). The WIA service data, obtained from the Federal Research & Evaluation Database, once tabulated and made into an ad hoc report, will show and compare by each WDB the veterans versus non-veterans that are being served within each WDA. This data can be reviewed based on low income and training type and show if each WDB is meeting the requirements of veterans receiving priority of service "in proportion to the incidence of representation of veterans in the labor market".

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All WDBs have local policies to serve qualified veterans and their spouses first for WIA services. These will also be re-reviewed during the monitoring to ensure that the most recent Veteran Policy issuance is incorporated into their policy.

### ***Service Delivery to Targeted Populations***

***Question IX.C.4.a. Describe the state's strategies to ensure that the full range of employment and training programs and services delivered through the state's One-Stop delivery system are accessible to and will meet the needs of dislocated workers, displaced homemakers, low-income individuals, migrant and seasonal farm workers, women, minorities, individuals training for nontraditional employment, veterans, public assistance recipients and individuals with multiple barriers to employment (including older individuals, limited English proficiency individuals, and people with disabilities). (§112(b)(17)(A)(iv).)***

*In responding to this question, the state should:*

- *Describe the strategy the state will use to effectively implement the Recovery Act priority of service for low-income individuals and recipients of public assistance under the WIA Adult program.*

[WIA State Plan PY 09-10, Page 54]

Given some expanded service delivery methods, DWD will place a strong focus on the following to ensure full participation of all customers:

- Job Centers will administer any tests or examinations to obtain licenses and certifications in a way such that the individual's abilities and skills are accurately measured despite the existence of any barriers.
- Job Centers seek input from local resources and experts such as Disability Program Navigators to determine whether administrative procedures and criteria have an effect of screening out individuals with barriers to employment.
- Job Centers will plan work experiences and/or other job assistance services with local businesses based on the skills and abilities of the individual to match the business needs.
- Provide resources for participants to learn the impact of employment on existing or potential benefits.

Wisconsin's State Plan provides detail and background on a major collaborative effort to ensure the array of services for persons with disabilities who have been part of the long-term care system. [State Plan IX.C.4.f. page 57] Since that Plan submission, a new CWI- MIG Subcommittee has been appointed that includes a broad range of expertise given their expanded role to advise on and monitor the implementation effort of the MIG and the Managed Care and Employment Task Force recommendations. Attachment I details the new charge of the subcommittee which was adopted at the March 27, 2009 CWI meeting.

The Administrator's Memos, 09-01 and 09-02, stressed the importance of providing in-depth support, if needed, for success training completion of persons who may have multiple barriers. The state policy emphasizes the use of supportive services and needs related payments: It reiterates that "supportive services may include transportation, child care, dependent care, housing, and other services that are necessary to enable an individual, who is unable to obtain services from other programs, to participate in activities authorized under WIA." In addition, "WDBs should take advantage of the availability of these payments so that customers can

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pursue their career goals, rather than their short-term income needs determining the length of their training."

Finally, Job Service staff are the primary Job Center resource room staff, serving customers who come into the One Stop. These staff provide front-end employment assistance as well as program information for the various partners in our system, including DVR. A common intake form is used to initially identify customers who are seeking, or may benefit by, a referral to DVR for services, and then those referrals occur along with dual enrollments when appropriate. Job Service staff also provide assistance to all our job seekers, including those with disabilities, in registering and using JCW to do job search, create resumes, email employers, etcetera.

### **Section III. Operations**

#### ***Transparency and Public Comment***

***Instruction from Section II of State Planning Guidance Plan Development Process: Include a description of the process the state used to make the Plan available to the public and the outcome of the state's review of the resulting public comments. (§§111(g) and 112(b)(9).)***

*The Recovery Act places a high priority on transparency. The state should describe:*

- *State efforts to promote transparency.*
- *The process used to make the Plan modification available to the public and the outcome of the state's review of resulting public comments.*

In addition to the coordination and roll-out activities updated daily on the DWD ARRA website, post-activity on successes will also electronically available for public transparency. The website will post enrollment and expenditure data by WDB and statewide.

Governor Doyle began meeting with the Chair of the CWI to discuss his workforce priorities when the new Chair was confirmed in Spring 2007. Since the Chair's first CWI meeting, July 10, 2007, there have been on-going discussions to help steer the CWI's work. On behalf of the CWI, their Executive Committee conducted extensive review of current programs and practices as a means to develop a more responsive and coordinated workforce system. The Executive Committee met in open meetings on May 7, June 20, July 11, and November 11, 2008 to refine recommendations, and report to the CWI for further discussions. In addition, the DWD Secretary provided reports to the CWI on tandem issues related to the Governor's initiatives. The draft Wisconsin State Plan Modification was issued for public review and comment to the full-range of workforce partners prior to submittal to DOL on April 15, 2009. The draft ARRA Addendum that included the Waiver Plan was issued on May 19, 2009 for public review and comment. (Attachment M)

#### ***Increasing Services for Universal Access***

***Question VI.C. What state policies are in place to promote universal access and consistency of service statewide? (§112(b)(2).)***

*In its response, the state should explain how it will efficiently and effectively use its Wagner-Peyser Recovery Act funds to support the hiring of sufficient levels of staff in the limited time period available for state One-Stop Career Centers to provide universal access and services required to meet the needs of increased numbers of customers in the economic downturn.*

[WIA State Plan Modification PY 09-10, Page 25 and Page 122]

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Wisconsin has an approved Methods of Administration through September 26, 2010. WIA Section 188 is part of the annual monitoring guides. Finally, at the One-Stop service delivery level, the Wisconsin Job Center Standards include several standards that require universal access.

To increase service delivery for re-employment efforts, DWD will be hiring 50 additional staff and located at multiple additional sites across the state.

Through a comprehensive training strategy using the Disability Program Navigators (DPN), DWD will implement strategies to train existing, new staff hired with ARRA funds and partner staff that will cover WIA 188, Rehab Act 504, and ADA –ADAA (Note: Final regulations for the Americans with Disability Act as amended are not expected to be fully implemented until 2010 and the focus will be on current ADA regulations.)

DPNs will work closely with partner staff to ensure services offered off-site outside of the standard Job Center to ensure all WIA services are universally accessible. All newly hired ARRA staff identified to work offsite will receive priority training to ensure universal access. DPNs will work closely with EO to ensure Methods of Administration are followed and assist with any corrective actions.

The primary implementation strategy will focus on customer staff to ensure that all consumers and potential participants have access to the same information to help assess their needs and interests and receive the same opportunities to fully and equally participate in services. This greeting procedure may include:

- Requesting that consumers complete an intake/assessment form to determine needs and services,
- Offering all consumers (regardless of the *appearance* of a disability) assistance with completing forms,
- Displaying within close proximity written materials regarding the One-Stop services and programs available, and
- Requesting that consumers meet with an intake/referral specialist to assess an individual's needs, interests, and preferences in order to determine appropriate services and modifications/accommodations

Additional emphasis will be placed on:

- Not denying individuals opportunities to participate in services, training, aid, benefits, or training;
- Providing services, training, aid, benefits, or training equal to that provided to other participants;
- Providing an individual with a disability an aid, benefit, service or training that is as effective in achieving the same result or experience as other participants;
- Not providing different, segregated, or separate aid, benefits, services, or training to individuals with disabilities (unless such action is necessary to achieve the same result);
- Offering opportunities for individuals with disabilities to participate as members of planning/advisory board; and
- Not limiting an individual with a disability's enjoyment in any right, privilege, advantage, or opportunity enjoyed by others receiving benefits, services, or aid.

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### **Local Planning Process**

**Question VIII.D. Describe the state-mandated requirements for local areas' strategic planning, and the assistance the state provides to local areas to facilitate this process. (§112(b)(2) and 20 CFR 661.350(a)(13).)**

*In responding to this question, states should describe how they are facilitating the use of the local planning process to ensure that local areas are able to update their Local Plans and still quickly and efficiently deliver increased levels of services as intended under the Recovery Act.*

[WIA State Plan Modification PY 09-10, Page 29 and 30]

Wisconsin's State Plan modification highlights issue areas included in the Local Plan Guidelines that mirrors the new state roadmap for the workforce system and economic stability. The WDBs submitted their local plans on April 30, 2009. In order for WDBs to update their local plan, DET issued an ARRA Addendum Local Plan Guideline on May 19, 2009. [Attachment J] Information from the WDBs on WIA and ARRA activities will be collated and reported to the CWI.

### **Procurement**

**Question VIII.F.5. Describe the competitive and non-competitive processes that will be used at the state level to award grants and contracts for activities under title I of WIA, including how potential bidders are being made aware of the availability of grants and contracts. (§112(b)(16).)** (Note: All procurements must comply with OMB requirements codified in 29 CFR Parts 95.40-95.48 and 97.36.) *In answering this question, the state should describe:*

- *How providers of all youth services will be procured under the Recovery Act. If using funds for summer employment opportunities and the fiscal agent or the state is not operating this program element, please specifically describe procedures for procuring summer employment operational entities and job opportunities.*
- *How the state will implement the Recovery Act provision that a Local Workforce Investment Board may award a contract to an institution of higher education or other eligible training provider if the local board determines that it would facilitate the training of multiple individuals in high-demand occupations, and if such a contract does not limit customer choice.*

[Wisconsin WIA State Plan PY 09-10, Page 35]

Administrator's Memo 09-02 addresses the contractual activity with institutions of higher education and other eligible service providers. DWD will follow the state procurement procedures that allows the Governor to implement waivers for expediting procurement. DWD will seek those waivers if it is determined to be necessary.

### **Technical Assistance**

**Question VIII.G.2. Describe how the state helps local areas identify areas needing improvement and how technical assistance will be provided. (§112(b)(14).)**

*In answering this question, the state should describe its strategy for providing training and technical assistance to local areas for all programs funded by the Recovery Act, including whether Recovery Act funds will be used for technical assistance and training to local areas. The state should also address training to be provided to new staff and technical assistance on the creation of a summer employment program.*

[Wisconsin WIA State Plan PY 09-10, Page 36]

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Wisconsin has a cadre of workforce development program training and technical assistance (TAT) planned for 2009 to support local regions with their implementation and management of the WIA programs. Planned activities include sponsoring a statewide workshop and roundtable, providing workforce programs information and guidance through a variety of communications venues such as scheduled teleconferences and web resources. The following highlights DWD's activities to-date and the remaining TAT plan:

### **Summer Youth Employment Program**

The DWD Secretary launched the ARRA/WIA Summer Youth Employment Program jointly with the MWIB on March 5, 2009. The one-day "Best Practices to Implement a Successful Summer Youth Employment Program" attendees included WDB staff, WIA Youth Coordinators and Youth Service Providers from throughout the state and multiple agency state staff. The sessions were on:

- Program Design, Performance, Monitoring and Evaluation
  - Worksite selection
  - Child Labor Laws
  - Frequency and Focus of Monitoring
  - Evaluation
  - DET Technical Assistance
  - State Partners (DOC, DCF, DPI, DWD's Vocational Rehabilitation, Youth Apprenticeship, Adult Apprenticeship and Veterans Services)
- Program Planning and Staffing
  - Activity Timeline
  - Budgeting
  - Hiring Staff
  - Worksite Supervisor Training
  - Payroll and Timesheet Systems
  - Insurance - Workers Compensation and other coverage
- Marketing and Outreach
  - Best Practices to Find Youth
  - Best Practices to Find Worksites
  - Marketing Materials
  - Completion Activities

### **Wisconsin Sector Strategies Initiative Workshop**

Sponsor a half-day, workshop on the Wisconsin Sector Strategies Initiative to coordinate and jump start newly funded regional projects that are planned to strengthen the knowledge base and skills of their local area workforce. This Sector Strategies Workshop will bring together regional partnerships from industry, labor, education, workforce development, and economic development, to provide them with information and training resources that further solidify and advance the local regions sector strategies. Anticipated attendees of 50 to 75 WDA Sector Strategies Regional Project partnerships and DWD staff. The workshop is to be held in the summer of 2009.

### **On-the-Job Training and Customized Training**

DET will be issuing a state policy on OJT and customized training.

### **ARRA and WIA Program and Policy Guidance Web Page**

Expand the DWD ARRA website to include WIA program guidance. Specific topic sections on the web page would be created and maintained for all WIA programs including the Youth and

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Summer Youth programs. This web page would also be linked to federal and state ARRA and WIA resource websites including the U.S. DOL/ETA ARRA Q&A websites.

### **WIA Programs and ARRA Fiscal Accountability (ASSET) Reporting Guidance**

Represented by state-wide field staff and DET, the ASSET Users Group meets monthly on technical aspects of WIA reporting. A similarly designed entity also meets as a Automated Information Management Fiscal Group. If either of these bodies identify issue areas needing state clarification, DET will develop and issue guidance on collection, reporting and accountability standards. In addition, when DOL's guidance is issued related to details on reporting, DWD will provide any additional state policy.

### **On-going WIA Youth Summer Employment Program**

From April through September 2009, the WIA Youth Summer Employment Program will be a standing agenda item on monthly teleconferences held by the Wisconsin Youth Program Coordinators Team. The Coordinators Team is comprised of DET staff and local representatives from the 11 WDAs. During their monthly communications, the Youth Program Coordinators will have an opportunity to discuss issues and share promising practices on their local Youth Summer Employment Program activities and events. As needed, the Coordinators Team will invite the USDOL/ETA Youth Programs staff and/or other state agency staff to participate in their discussions on Wisconsin's Summer Youth Employment Program. Issues that arise between the monthly teleconferences can be addressed by a work group of WDA Youth Program leads that serve as a subcommittee for the state Youth Program Coordinators Team.

### **Workforce (WIA adult, DW, and youth, TAA, and Veterans) Programs Roundtable**

Hold annual, one-day Fall (September) Roundtable for Wisconsin state and local area staff and managers, who collaborate on the workforce development programs. This Roundtable is an effort to continuously improve the skills of Wisconsin's program service delivery staff and managers, and to build stronger partnerships between the local and state agencies and organizations that deliver these workforce services. Anticipated attendees of 120 statewide WIA programs staff and managers, TAA program staff and managers, Veterans Programs staff and managers, Workforce Development Board directors and staff, and local job center staff.

Topics may include:

- Federal/State Legislative Updates
- Labor Market Information and Economic Trends
- How to Better Serve Youth (Foster Care, Runaways, Homeless, Persons with Disabilities, and Juvenile Offender Youth)
- Integration of Apprenticeship into WIA
- Job Center of Wisconsin
- Sector Strategies – Regional Sector Based Workforce Development Strategies
- Unemployment Insurance
- Wisconsin's Green Jobs
- WI Manufacturing Skill Standards Certification

### **Disability-Related Training**

DET will augment the previous year's technical assistance on benefits counseling to WIA case managers to include other workforce partners as well as focus on Section 188 for the new delivery sites and sessions on "reasonable accommodation: local application." TAT and collaboration with MCOs and Employee Resources Inc. will also be conducted through PY 09-10 for additional WIA case manager education particularly with increased activity of the Ticket-to-Work program.

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### **Dislocated Worker and Trade Adjustment Assistance Programs Training WIA and TAA Coordination Training**

DET DW staff will conduct training on existing DW TAA Program Guidelines and on the new TAA Program Guidelines. The purpose of this training is to familiarize WIA staff with TAA program requirements in order to increase co-enrollment of dislocated workers. Participants will include local WDA's DW Program Managers, DW Program Case managers, and DWD staff working with WIA contracts. This statewide training will be delivered in a central location during the summer 2009 with an anticipated attendance of approximately 75 to 100 participants.

### **TAA Reauthorization, NEG and RES Training**

DET and UI staff will conduct training on the TAA Reauthorization. Participants will include local TAA Case Managers, Job Service District Directors, and DET staff. This statewide training will be delivered in a central location in the summer 2009. Anticipated attendance is approximately 30 to 50 participants. In addition, there will be technical support to assist throughout the implementation of the new regulations.

RES and Resource Room training will be provided to the newly hired RES staff and WDB staff will also be invited to participate.

Finally, there will be training on the statewide assessment tool.

### ***Monitoring and Oversight***

***Question VIII.H. Describe the monitoring and oversight criteria and procedures the state utilizes to move the system toward the state's vision and achieve the goals identified above, such as the use of mystery shoppers, performance agreements. (§112(b)(14).)***

*In responding to this question, the state should demonstrate, through a monitoring plan or otherwise, that the state monitoring system meets the requirement of 20 CFR 667.410(b)(2) and that the state's plan includes monitoring and oversight of the additional funds provided under the Recovery Act, particularly plans to monitor reemployment services and summer employment, including summer employment worksites.*

[WIA State Plan Modification PY 09-10, Page 36]

DET has two Local Program Liaisons (LPL) who will oversee and monitor the activities of the ARRA Adult, DW and Youth Programs. Monitoring will consist of both desk review and onsite reviews. Below are the timelines and a summary of how these will be conducted. See attachment K for the detailed timelines and monitoring guides.

### **Youth**

- June 2009: WDBs will submit a list of summer youth work sites prior to the onsite monitoring visit. From this list, samples will be chosen of various locations to be visited for onsite monitoring.
- July-August 2009: LPLs will conduct onsite monitoring of the summer youth sites that will include an interview with WDB staff to ensure that the local area is providing services according to TEGL 14-08, DWD Administrator Memo 09-01, and their approved WDB ARRA Plan. In addition, there will be youth participant interviews, workplace supervisor interviews and participant file reviews.
- LPLs will issue a monitoring report to the WDB within 30 days of the on-site review. Monitoring reports will cite items that need to be revised or corrected to ensure compliance.

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Any items needing immediate corrective action such as safety hazards or illegal working conditions will be addressed immediately. Other non-emergency items will require correction within a logical duration of time as determined by the LPL. LPLs will monitor to ensure the corrective action is implemented.

### Adult and Dislocated Worker

- July-August 2009: LPLs will conduct onsite readiness reviews of the Adult and DW programs at the same time that summer youth monitoring is conducted. Monitoring will include an interview with WDB staff to ensure that the local area is providing services according to TEGL 14-08, DWD Administrator Memo 09-02 issued April 16, 2009, and the approved local ARRA Plan. This is in addition to the annual monitoring that will begin in October 2009 on WIA and ARRA Youth, Adult and Dislocated Worker programs.

### Fiscal Monitoring

DWD has a fiscal system in place, CORE, that will be used for ARRA funds. The ARRA funds and the local formula funds activities will be captured separately in this system for reporting purposes. Financial reports will be reviewed monthly by DWD fiscal staff. In addition, DET staff will conduct an annual on-site visit at all 11 WDBs with special review emphasis on ARRA procurement, prevailing wage and Buy America.

### TAA and NEG

While the data validation exercise captures some information regarding TAA, DET plans to provide additional monitoring for these programs either separately or in tandem with the above annual monitoring. TAA will be a new program implementation technical assistance visit.

### Accountability and Performance

**Question X.C.1. Describe the state's performance accountability system, including any state-system measures and the state's performance goals established with local areas. Identify the performance indicators and goals the state has established to track its progress toward meeting its strategic goals and implementing its vision for the workforce investment system. (§§112(b)(3) and 136(b)(3).)**

- *The Recovery Act emphasizes the importance of accountability. Describe the state's overall efforts to hold the state and its local areas accountable for the results of activities funded by the Recovery Act, and how the state will measure whether it has achieved the state's goals for implementation as described in Questions I.C. and I.E. under "State Vision and Priorities."*
- *The Recovery Act requires states to report on work readiness to assess the effectiveness of summer employment opportunities for youth. The state should identify its methodology for determining whether a measurable increase in work readiness skills has occurred, and what tools will be used for this determination*

[Wisconsin WIA State Plan PY 09-10, Page 74]

DWD will employ several approaches to ensure that state and local programs meet Wisconsin's ARRA goals.

- Policy guidance to inform program operators of state priorities and to supplement DOL guidance.
- Technical assistance and training to local programs to clarify and advance policy initiatives or to meet deficiencies identified in the monitoring process.

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- A comprehensive monitoring system that includes desk reviews of progress reports and WDB self-assessment reviews. Desk reviews will be supplemented by on-site visits by DWD program and audit staff.

WDBs must determine whether a measurable increase in work readiness skills has occurred. When determining this, WDBs should follow the definition for a work readiness skill goal (see TEG 17-05, Attachment B Definition of Key Terms):

- *Work readiness skills goal* – a measurable increase in work readiness skills including world-of-work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters.) They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along and working well with others, exhibiting good conduct, following instructions and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem-solving skills, and acquiring an improved self-image.

WDBs should choose from a variety of assessment tools including worksite supervisor evaluations, work readiness skill checklists administered by program staff, portfolio assessments, and any other relevant forms of assessing work readiness skills.

**ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

**Workforce Investment Act and Wagner-Peyser Act  
Negotiated Performance Levels for PYs 2007 and 2008 and Proposed PY2009 Levels  
Wisconsin**

***Workforce Investment Act Performance Levels***

<b>Adult Measures</b>	<b>PY 2007</b>	<b>PY 2008</b>	<b>PY 2009</b>
Adult entered employment	76.00	78.00	70.00
Adult employment retention	84.00	86.00	82.00
Adult average six-month earnings	\$9,500.00	\$9,800.00	\$9,500.00
Adult employment and credential	66.30	67.70	Waived
<b>Dislocated Worker Measures</b>			
Dislocated worker entered employment	88.70	90.40	84.00
Dislocated worker employment retention	93.80	95.70	93.00
Dislocated worker average six-month earnings	\$14,175.00	\$14,400.00	\$14,000.00
Dislocated worker employment and credential	74.00	75.00	Waived
<b>Older Youth Measures</b>			
Older youth entered employment	75.50	77.00	Waived
Older youth employment retention	86.00	87.00	Waived
Older youth earnings change	\$4,552.00	\$4,575.00	Waived
Older youth credential	61.00	62.00	Waived
<b>Younger Youth Measures</b>			
Younger youth Skill Attainment	92.00	94.00	Waived
Younger youth diploma	82.00	83.00	Waived
Younger youth retention	75.90	77.70	Waived
<b>Youth Common Measures</b>			
Youth Placement into Employment/Education			72.00
Youth Degree/Certificate Attainment			75.00
Youth Literacy/Numeracy Gains			17.00
<b>Customer Satisfaction Measures</b>			
Participant ACSI	76.90	78.90	Waived
Employer ACSI	77.90	79.80	Waived
<b><i>Wagner-Peyser Act Performance Levels</i></b>			
<b>Measures</b>	<b>PY 2007</b>	<b>PY 2008</b>	
Entered employment	65.00	66.00	61.00
Employment retention	86.00	87.00	84.00
Average six-month earnings	\$13,500.00	\$13,800.00	\$13,500.00

**ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

**Attachment A**

**ETA Regional Administrator**

Region 5 - CHICAGO/KANSAS CITY

Byron Zuidema  
Regional Administrator  
U.S. Department of Labor/ETA  
230 S. Dearborn Street, Rm. 628  
Chicago, Illinois 60604  
(312) 596-5400  
FAX: 312-596-5401  
[Zuidema.byron@dol.gov](mailto:Zuidema.byron@dol.gov)

# ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

## Attachment B

### Program Administration Designees and Plan Signature

**Name of WIA Title I Grant Recipient Agency:** Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

**Name of WIA Title I Signatory Official:** Roberta Gassman, Secretary, Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail Address: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

**Name of WIA Title I Liaison:** Ron Danowski, Division Administrator, Division of Employment and Training  
Address: 201 East Washington Avenue, G108, Madison, WI 53702  
Telephone Number: 608-266-3485  
Facsimile Number: 608-261-8506  
E-mail Address: [ron.danowski@dwd.state.wi.us](mailto:ron.danowski@dwd.state.wi.us)

**Name of Wagner-Peyser Act Grant Recipient/State Employment Security Agency:**  
Roberta Gassman, Secretary, Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail Address: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

**Name and title of State Employment Security Administrator (Signatory Official):**  
Roberta Gassman, Secretary, Department of Workforce Development  
Address: 201 East Washington Avenue A400, Madison, WI 53702  
Telephone Number: 608-267-1410 TTY: 608-267-0477  
Facsimile Number: 608-266-1784  
E-mail Address: [roberta.gassman@dwd.state.wi.us](mailto:roberta.gassman@dwd.state.wi.us)

As the Governor, I certify that for the State of Wisconsin, the agencies and officials designated above have been duly designated to represent the State/Commonwealth in the capacities indicated for the Workforce Investment Act, Title I, and Wagner-Peyser Act grant programs. Subsequent changes in the designation of officials will be provided to the U.S. Department of Labor as such changes occur.

I further certify that we will operate our Workforce Investment Act and Wagner-Peyser Act programs in accordance with this Plan and the assurances herein.

Typed Name of Governor JIM DOYLE

Signature of Governor \_\_\_\_\_ Date \_\_\_\_\_

# ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

## Attachment C

### Acronyms

ARRA: American Recovery and Reinvestment Act of 2009

CWI: Council on Workforce Investment

DCF: Department of Children and Families

DET: Division of Employment and Training

DOC: Department of Corrections

DOL: Department of Health Services

DOL: Department of Labor

DWD: Department of Workforce Development

EISP: Emerging Industry Skills Partnership

JCW: Job Center of Wisconsin

MCO: Managed Care Organization

MOU: Memorandum of Understanding

MSSC: Manufacturing Skills Standards Certification

NGA: National Governor's Association

PLTW: Project Lead the Way

RISE: Regional Industry Skills Education

TEGL: Training and Employment Guidance Letter

UI: Unemployment Insurance

UW: University of Wisconsin

VPL: Veterans Priority Letter

VR: Vocational Rehabilitation

W-2: Wisconsin Works/TANF

WDA: Workforce Development Area

## **ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

WDB: Workforce Development Board

WIA: Workforce Investment Act

WRTP: Wisconsin Regional Training Partnership

WTCS: Wisconsin Technical College System

# ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

## Attachment D

### Governor Doyle's Executive Order

#### Executive Order # 278 Relating to the Creation of Job Opportunities in Wisconsin

WHEREAS, President Barack Obama signed the "American Recovery and Reinvestment Act of 2009" ("ARRA") into law on February 17, 2009; and

WHEREAS, the American Recovery and Reinvestment Act of 2009 provides renewed opportunities for citizens for job preservation and creation, infrastructure investment, energy efficiency, developing new technologies, assistance to the unemployed, and State and local fiscal stabilization; and

WHEREAS, the specific purposes of the American Recovery and Reinvestment Act of 2009 include preserving and creating jobs; promoting economic recovery; assisting those most impacted by the recession; providing investments needed to increase economic efficiency by spurring technological advances in science and health; investing in transportation, environmental protection and other infrastructure that will provide long-term economic benefits; and stabilizing State and local government budgets; and

WHEREAS, the key to a strong Wisconsin economy is an effective and agile workforce system that connects people to industries with job openings and to employers who need a skilled workforce; and

WHEREAS, Wisconsin has highly motivated workers who desire work opportunities so that they may support themselves and their families; and

WHEREAS, connecting job seekers and employers will promote and grow Wisconsin's economy and create new economic opportunities for Wisconsin's workers and employers; and

WHEREAS, Wisconsin can affirm its commitment to creating job opportunities made possible through the implementation of the American Recovery and Reinvestment Act of 2009;

NOWHEREFORE, I, JIM DOYLE, Governor of the State of Wisconsin, by the authority vested in me by the Constitution and the laws of this State, do hereby:

1. Direct all Executive Branch agencies to include in all contracts funded, in whole or in part, by the American Recovery and Reinvestment Act of 2009 ("ARRA-funded state contracts"), for which the invitations for bids or other solicitations for bids are published on or after February 17, 2009, a clause requiring contractors and subcontractors to ARRA-funded state contracts who employ workers in Wisconsin to post job openings created by ARRA-funded state contracts on the JobCenterOfWisconsin.com website.
2. Encourage local governments and their subunits that manage local projects funded by the American Recovery and Reinvestment Act of 2009 to require contractors and subcontractors who employ workers in Wisconsin to post job openings created by ARRA-funded local projects on the JobCenterOfWisconsin.com website.
3. Encourage Wisconsin employers who enter into ARRA-funded state or local contracts or who otherwise receive funding from the American Recovery and Reinvestment Act of 2009 to post job openings created by the ARRA-funded contract or ARRA funding on the JobCenterOfWisconsin.com website.
4. Posting is not required where an employer, contractor or subcontractor of an ARRA-funded state contract intends to fill the job opening created by ARRA funding with a present employee, a laid-off former employee or a job candidate from a previous recruitment, or where an exception has been granted by the Executive Agency or Wisconsin Department of Workforce Development.

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

5. Nothing in this order shall be interpreted to require the employment of apprentices if such employment may result in the displacement of journey workers employed by any employer, contractor or subcontractor.

6. Nothing in this order shall be read to permit any Executive Branch agency, local government, employer, contractor, subcontractor, or other entity to violate or ignore any laws, rules, directives or other legal requirements or obligations imposed by state or federal law. If any provision in this order conflicts with any law, rule, or other legal requirement or obligation imposed by state or federal law, the state or federal law shall control.

7. Nothing in this order creates any right, benefit, or trust responsibility, substantive or procedural, enforceable at law by a party against the State of Wisconsin, its agencies or employees, or any other person.

IN TESTIMONY WHEREOF, I have  
hereunto set my hand and caused the Great Seal of the State of Wisconsin to be affixed. Done at the Capitol in the  
City of Madison this sixteenth day of April in the year two thousand nine.

---

JIM DOYLE  
Governor

By the Governor:

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DOUGLAS LA FOLLETTE  
Secretary of State

ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

Attachment E

Department of Workforce Development  
Administrator's Memos

DEPARTMENT OF WORKFORCE DEVELOPMENT  
DIVISION OF EMPLOYMENT AND TRAINING  
ADMINISTRATOR'S MEMO SERIES

ACTION 9-02  
 NOTICE

\* \* \* SPECIAL ISSUE \* \* \*

ISSUE DATE: **April 16, 2009**  
DISPOSAL DATE:

\*PROGRAM CATEGORIES: **WIA**

**To:** Workforce Development Board Directors

**From:** Roberta Gassman  
Secretary

**RE:** American Recovery and Reinvestment Act (ARRA) of 2009: Workforce Investment Act (WIA) **Adult and Dislocated Worker Programs**

**PURPOSE:**

The purpose of this Administrator's Memo is to provide policy guidance and direction regarding the American Recovery and Reinvestment Act (ARRA) of 2009 funding for activities authorized under the Workforce Investment Act (WIA) for the Adult and Dislocated Worker Programs.

**REFERENCES:**

U.S. Department of Labor (DOL) Training and Employment Notice 30-08  
DOL Training and Employment Guidance Letter 13-08  
DOL Training and Employment Guidance Letter 14-08  
DOL Training and Employment Guidance Letter 14-08, Change 1

**BACKGROUND:**

The ARRA of 2009 provides \$500 million in funding for the WIA Adult Program and \$1.25 billion for the Dislocated Worker Program. For the Adult Program, Wisconsin received \$5.18 million [85% of that amount, \$4.4 million, is distributed to the 11 Workforce Development Boards (WDB) by formula]. Wisconsin received \$16 million for the Dislocated Worker Program, of which 60% or \$9.63 million is distributed to the 11 Workforce Development Boards.

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**\*PROGRAM CATEGORIES:**

AS--Apprenticeship  
Standards  
CR--Civil Rights

FM--Financial Management  
Requirements  
FL--Foreign Labor Certification  
IT--IT Systems  
JC--Job Center

LM--Labor Market  
Information  
ML--Migrant Labor  
RA--Refugee Assistance  
TC--Tax Credit Programs  
TA--Trade Assistance

TR--Transportation  
WIA--Workforce  
Investment Act  
YA--Youth Apprenticeship

## **ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

ARRA funding allocated for WIA are Program Year (PY) 2008 funds. Section 133(c) allows WDBs two years from the start of the program year to expend these funds, or they are subject to recapture and reallocation by the state. WDBs must expend allocated ARRA funds prior to June 30, 2010 or DWD may recapture and reallocate those funds to ensure ARRA funds are expended by the June 30, 2011 deadline for the use of PY2008 funding specified in TEGL 14-08.

ARRA is intended to preserve and create jobs, promote the nation's economic recovery, and assist those most affected by the recession. The purpose of these funds is to substantially increase the number of adults and dislocated workers being served and to support their entry or re-entry into the job market. Additionally, overall enrollments in training are expected to increase significantly.

All WIA provisions are applicable for ARRA implementation. ARRA funds can be used on all activities specified under the WIA Title I Adult and Dislocated Worker programs unless expressly stated otherwise in this document. TEGL 14-08 states that the Recovery Act funding is to be spent concurrently with other WIA and Wagner-Peyser funding, and should not be used to replace state or local funding currently dedicated to workforce development.

See Attachment 1 for the Adult and Dislocated Worker ARRA Allocations by Workforce Development Area.

### **DISLOCATED WORKER POLICY:**

It is the intent of ARRA that substantially increased numbers of dislocated workers will be served with the infusion of formula funds, and that training will be a significant area of focus. Refer to the Training section below for further details.

### **Co-enrollment of individuals served by ARRA Dislocated Worker Funds and the Trade Adjustment Assistance Program**

Dislocated workers eligible for the Trade Adjustment Assistance (TAA) program are expected to be co-enrolled in the WIA Title I Dislocated Worker Program. This is to ensure that the resources available through each program are maximized and a comprehensive package of services is made available to each dislocated worker.

The TAA program will fund occupational and on-the-job training, provide income support in the form of trade readjustment allowances and other TAA services, including allowable payments for transportation, relocation and subsistence. The WIA program will provide "wrap around" services, which typically include assessment, case management, job search and placement assistance, supportive services and follow-up services.

### **TAA Reauthorization**

The TAA program was reauthorized under ARRA, with changes taking effect on May 18, 2009. Changes include some expanded benefits and services and added flexibility, particularly in the area of training requirements. A workgroup made up of state and local TAA and WIA staff has recently formed to identify strategies to expand co-enrollment, particularly in the context of TAA reauthorization. Additional guidance on WIA and TAA program co-enrollment and changes to the TAA program will be issued in the near future.

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

### ADULT and DISLOCATED WORKER POLICY:

#### Targeted Populations and Priority of Service

ARRA encourages the funds to be used on services that most efficiently and effectively assist workers affected by the current economy to obtain employment, with priority given to public assistance recipients and other low income individuals as defined in WIA section 134(d)(4)(E).

WDBs must incorporate priority of services for veterans and eligible spouses sufficient to meet the requirements of 20 CFR part 1010, published at Fed. Reg. 78132 on December 19, 2008, the regulations implementing priority of service for veterans and eligible spouses in Department of Labor job training programs under the Jobs for Veterans Act. Under sec. 1010.310(b)(3) of these regulations, when the veteran's priority is applied in conjunction with another statutory priority like the Recovery Act's priority for recipients of public assistance and low-income individuals, veterans and eligible spouses who are members of the Recovery Act priority group must receive the highest priority within that priority group, followed by non-veteran members of the priority group. The WDBs' priority of service policies for qualified veterans and their spouses under the Job for Veterans Act continue to apply. Shortly, the DET Office of Veterans Services will issue a new Veteran Program Letter (VPL). At that time, WDBs must review their policies for compliance with the VPL and revise them accordingly.

The State continues to emphasize "universal access" provisions of WIA in order to meet the needs of persons with disabilities, persons in correctional facilities, and other marginalized individuals.

#### Sequence of Service

WIA Title I provides the basis for Adult and Dislocated Worker ARRA activities including the determination of the core/intensive/training service provisions. As stated in the preamble to the WIA regulations, and reiterated in ARRA, these determinations do not mean that the individual must go through layers of service to prove that need; the determination of need itself can be a core and/or intensive service, such as an assessment, or development of an Individual Employment Plan. Thus, a caseworker could initially meet with a participant, assess his or her skills, and consider labor market conditions, and determine that core or intensive services will not be sufficient to result in employment for the participant. The provision of training or other needed services can then be provided sequentially, concurrently, or in whatever order makes the most sense for the individual.

#### Assessment Services

**The State also re-emphasizes that the initial assessment of a participant is vital to ensuring short and long-term successes. All participants must receive an objective assessment. The primary focus must be on assessment and data driven career counseling that support training and job search activities aligned with economic and job growth. Case managers should help eligible customers take advantage of the significant increase in Pell Grant funds also included in ARRA.**

#### Training and Related Services

WDBs must spend at least 70 percent of the ARRA Adult funds and ARRA Dislocated Worker funds on training. Training services include the full range of occupational skills training, adult education and literacy services, and customized training as described in WIA. Training related expenditures for the participant such as supportive services and needs related payments are also allowable training costs for the 70 percent. Costs for assessment and case management may not be included for purposes of the 70 percent requirement.

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

WDBs are strongly encouraged to use the Wisconsin Technical Colleges in their areas as key training providers as they expend ARRA funds on all types of training, including basic and occupational skills training. As laid out in TEGL 14-08, WDBs may pay the full cost of training funded with ARRA dollars. Therefore, costs for hiring additional instructors to provide group training are allowable, and so when necessary, WDBs may cover these costs to facilitate expedited training delivery for WIA-funded participants. TEGL 14-08 strongly encourages WDBs to take an expansive view of how the funds can be integrated into transformational efforts to improve service delivery using ARRA funds.

WDBs are expected to use ARRA funding to emphasize assessment and training in these targeted industries: Energy, Weatherization, Health Care, and Advanced Manufacturing. Significant ARRA investments are also encouraged for key industries such as construction, transportation, renewable energy sectors and other industries with emerging green jobs that traditionally use or expect to draw heavily upon apprenticeship.

**WDBs may use ARRA funds to enter into contracts for group training. The full reasonable and necessary cost of group training is allowable so long as the contract does not limit customer choice, and does not duplicate existing training courses and curricula. Contract training providers are not required to be on the State Eligible Training Provider List to receive ARRA funding.**

WDBs may expend ARRA funds for curriculum development by an eligible training provider if the curriculum is for emerging sectors and enhances the capacity of the institutions to ensure quality training within limited timeframes and is in the context of providing training to WIA participants. Curriculum activities should focus on adapting existing or creating new curriculum that will result in a short-term increase in accelerated training capacity.

WDBs are expected to provide training services that, upon successful completion, lead to a certificate, an associate degree, baccalaureate degree, or the skills or competencies needed for a specific job or jobs, an occupation, or occupational group.

WDBs are strongly encouraged to use the technical colleges in their areas as a key provider of curriculum development for new courses that will serve WIA-funded participants.

Training services includes:

- Occupational skills training, including training for nontraditional employment\*\*
- Curriculum development linked with training
- On-the-Job Training
- Programs that combine workplace training with related instruction
- Co-operative education programs
- Registered apprenticeship
- Training programs operated by the private sector
- Skill upgrading and retraining
- Job readiness training
- Adult education and literacy activities provided in combination with any of the above
- Basic or English language education as long as they are provided in connection with occupational skill training leading to a job or career for which the individual is preparing.

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\* Nontraditional Training includes entrepreneurial training, Asset building, financial literacy training, and Micro- enterprise development.

## **ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

- Vocational English as a second language training
- Customized training conducted with a commitment by an employer or group of employers to employ the individuals upon successful completion of the training.

WDBs may use other methods of training such as the integration of work-based and classroom-based learning activities and class-size projects. DWD encourages the use of short-term training using the career pathways model.

### **ABE and GED Services**

Individuals need to be assessed on their English language and computer-skill levels sufficient to function in the workplace and community, other skills and abilities, and career goals to help them map their skills against current and anticipated jobs in order to design a comprehensive package of services. The State is directing WDBs to target funds for:

- (1) Adult Basic Education and basic skills training
- (2) Filling skill gaps or remediation
- (3) Bridge programs as defined in the Wisconsin RISE initiative
- (4) Coursework related to preparation toward a career goal

### **Supportive Services and Needs Related Payments**

ARRA recognizes that adults participating in training to advance or retool their skills will need supportive services and/or needs-related payments to remain and succeed in training. WIA provides the basis for these services, and WDBs are required to review and update their local policies.

TEGL14-08 reiterates that supportive services may include transportation, child care, dependent care, housing, and other services that are necessary to enable an individual, who is unable to obtain the services from other programs, to participate in activities authorized under WIA. Needs-related payments may be provided to adults who are unemployed and do not qualify for or have ceased to qualify for unemployment compensation for the purpose of enabling such individuals to participate in programs of training services. Guidance on the provision of needs-related payments to adults and dislocated workers can be found in 20 CFR 663.815 - 663.840. WDBs should take advantage of the availability of these payments so that customers can pursue their career goals, rather than their short-term income needs determining the length of their training

### **Waivers**

Waivers approved for PY 2008, and July 1, 2009 through September 30, 2009, are applicable to ARRA funds with one exception. The transfer of up to 100 percent of funds between the Adult and Dislocated Worker programs is not applicable to ARRA funds. The funds transfer limit for ARRA funds between the two programs remains at the current provision of up to 30 percent with the approval of DET.

### **Discretionary Awards**

In order to be eligible for regular statewide discretionary funds, statewide discretionary ARRA funds, or state endorsement for DOL's ARRA competitive grants, WDBs must:

- Expend 70% of ARRA WIA Adult and Dislocated Worker funds on training;
- Expend 35% of formula WIA Adult and Dislocated Worker funds (local allocation and Special Response funds) on training;
- Demonstrate that WIA and TAA recipients are co-enrolled; and
- Comply with state and federal ARRA reporting requirements.

## **ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

### **Allocations**

WIA ARRA Adult and Dislocated Worker allocations are found in Attachment 1. WDBs may begin incurring ARRA costs as of February 17, 2009 but must expend allocated ARRA funds prior to June 30, 2010. DWD may recapture and reallocate funds to ensure ARRA funds are expended by the June 30, 2011 deadline for the use of PY2008 funding specified in TEGL 14-08.

DWD expects to receive the Program Year 2009 WIA Allocations in the near future and will issue those amounts expeditiously. DOL expects coordination and concurrent expenditure of this fund source with WDB ARRA allocations.

### **Accountability: Transparency, Reporting, Monitoring**

ARRA funded participants and ARRA expenditures must be reported separately from the WIA formula funded programs.

- All employment opportunities, including WDB and contractor staff positions, generated by ARRA activities must be made available through the JobCenterofWisconsin.com website.
- All job-ready participants served by WIA formula and ARRA funding are to be registered, and have resumes available on JobCenterofWisconsin.com.
- All individuals served with ARRA funds must be tracked in ASSET. The DOL WIA Title I adult and dislocated worker program performance measures apply to ARRA funded participants. Further instructions will be provided after the DOL training and employment guidance letter is issued on participant and expenditure reporting.
- DET monitoring will begin in June and a check-off guide will be provided prior to on-site visits.

### **WIA Local Plan Guidelines**

In February, DWD issued the Program Year 2009 WIA Local Plan Guidelines. Through a separate communication, WDBs will receive an ARRA WIA Local Plan Guidelines supplement.

### **CORe reporting**

There are a number of new ARRA codes that have been created to track the ARRA funds. WDBs should carefully review their ARRA grant agreements regarding this.

### **Branding and Acknowledgements**

Any materials, documents or reports created using ARRA funds shall contain the ARRA symbol and give credit to ARRA and DWD for funding.

**ACTION SUMMARY STATEMENT:** Implement the ARRA Adult and Dislocated Worker Program as outlined in this Administrator's Memo, WIA law and regulations, and DOL-issued guidance.

### **CONTACT:**

For program questions, contact your Local Program Liaison. For fiscal questions, contact Nancy Eilks.

ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

**American Recovery & Reinvestment Act Adult & Dislocated Worker Allocations by WDA**

WDA Name		Adult			Dislocated Worker		
			Share	Allocation		Share	Allocation
1	Southeast		8.04%	\$354,399		8.22%	\$791,795
2	Milwaukee		36.44%	\$1,605,474		22.94%	\$2,210,446
3	WOW		4.55%	\$200,451	X	5.52%	\$531,606
4	Fox Valley		6.10%	\$268,904		8.35%	\$804,413
5	Bay Area	X	7.91%	\$348,334		8.70%	\$837,935
6	North Central		6.57%	\$289,696		9.37%	\$902,511
7	Northwest		9.60%	\$422,971		4.85%	\$467,409
8	West Central		5.55%	\$244,538		5.11%	\$492,670
9	Western	X	2.91%	\$128,441		6.00%	\$578,526
10	South Central	X	7.29%	\$321,424		12.07%	\$1,163,205
11	Southwest		5.03%	\$221,643		8.88%	\$855,248
	Total		100.00%	\$4,406,276		100.00%	\$9,635,764

X Held Harmless

Source: US DOL TEGL 13-08, March 2009

Updated October 20, 2009

**Workforce Investment Act Allocations by WDA: ARRA Act Fund -1a**

WDA Name		Adult			Youth			Dislocated Worker		
		Share	Allocation		Share	Allocation		Share	Allocation	
1	Southeast		10.10%	\$445,000		10.60%	\$1,243,882		7.72%	\$743,823
2	Milwaukee		32.22%	\$1,419,595		32.35%	\$3,796,842		19.03%	\$1,833,850
3	WOW	X	3.06%	\$134,792	X	2.94%	\$345,298	X	5.59%	\$539,088
4	Fox Valley	X	5.27%	\$232,429	X	5.11%	\$600,226		11.39%	\$1,097,147
5	Bay Area		11.04%	\$486,573		11.15%	\$1,308,552		12.10%	\$1,166,024
6	NorthCentral		8.56%	\$377,119		8.71%	\$1,022,662		8.91%	\$858,107
7	Northwest		9.18%	\$404,415	X	6.51%	\$763,584		4.28%	\$412,090
8	West Central	X	5.33%	\$234,986	X	6.47%	\$758,876	X	6.60%	\$635,632
9	Western	X	2.91%	\$128,441	X	3.00%	\$352,081		4.06%	\$391,671
10	South Central	X	6.59%	\$290,325	X	7.29%	\$855,141		11.74%	\$1,131,318
11	Southwest		5.73%	\$252,601		5.88%	\$690,347		8.58%	\$827,014
	Total		100.00%	\$4,406,276		100.00%	\$11,737,490		100.00%	\$9,635,764

X Held Harmless

Source: US DOL NOO March 19, 2009

**ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

**DEPARTMENT OF WORKFORCE DEVELOPMENT  
DIVISION OF EMPLOYMENT AND TRAINING  
ADMINISTRATOR'S MEMO SERIES  
\*\*\* SPECIAL ISSUE \*\*\***

   **X ACTION**     **9-01**  
   **NOTICE**

**ISSUE DATE:**        April 16, 2009  
**DISPOSAL DATE:**

**\*PROGRAM CATEGORIES: WIA**

**To:**    Workforce Development Board Directors

**From:** Roberta Gassman  
          Secretary

**RE:**    American Recovery and Reinvestment Act (ARRA) of 2009: Workforce Investment Act  
          (WIA) **Youth Funds**

**PURPOSE:** This Administrator's Memo provides final allocation amounts and direction on expenditure of WIA Youth funds, particularly related to Summer Youth Employment, provided through the American Recovery and Reinvestment Act of 2009.

**REFERENCES:**

U.S. Department of Labor (DOL) Training and Employment Notice (TEN) 30-08  
DOL Training and Employment Guidance Letter (TEGL) 14-08  
DOL Training and Employment Guidance Letter 14-08, Change 1

**BACKGROUND:** The American Recovery and Reinvestment Act (ARRA) of 2009 provides \$1.2 billion in funding for the Workforce Investment Act (WIA) Youth Program. Wisconsin will receive \$13.8 million (85% of that amount, \$11.7 million, is distributed to the 11 Workforce Development Areas). See Attachment 1 for ARRA allocations by Workforce Development Area. The expenditure period for the funds is from February 17, 2009 through June 30, 2010; however, the U.S. Department of Labor (DOL) has stated that they anticipate the majority of the expenditures will occur in 2009.

ARRA funding allocated for WIA are Program Year (PY) 2008 funds. Section 128(c) allows WDBs two years from the start of the program year to expend these funds, or they are subject to recapture and reallocation by the State. WDBs must expend allocated ARRA funds prior to June 30, 2010. DWD may recapture and reallocate funds to ensure ARRA funds are expended by the June 30, 2011 deadline for the use of PY2008 funding specified in TEGL 14-08.

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**\*PROGRAM CATEGORIES:**

**AS--Apprenticeship  
Standards  
CR--Civil Rights**

**FM--Financial Management  
Requirements  
FL--Foreign Labor Certification  
IT--IT Systems  
JC--Job Center**

**LM--Labor Market  
Information  
ML--Migrant Labor  
RA--Refugee Assistance  
TC--Tax Credit Programs  
TA--Trade Assistance**

**TR--Transportation  
WIA--Workforce  
Investment Act  
YA--Youth Apprenticeship**

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

As stated in TEN 30-08, there are a number of principles that we must keep in mind as we implement the ARRA:

- Transparency and accountability
- Expedited and effective use of the funds, with expenditures made concurrently with regular formula funds
- Emphasis on training and innovative and invigorated service delivery strategies
- Emphasis on services for hard-to-serve populations and needs-related payments.

**POLICY:** As outlined in the TEGL 14-08, "The Recovery Act, . . . . , is intended to preserve and create jobs, promote the nation's economic recovery, and to assist those most impacted by the recession." The WIA Youth Program funding provided through the ARRA will play a large part in reaching the goal of providing employment and other services to our young people. DWD expects that WDBs will be able to substantially increase the number of youth engaged in employment and training activities.

The purpose of the funding is to provide opportunities for summer employment in addition to year-round activities. Year-round activities could include tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention, work experience and occupational skills training. Eligibility for WIA Youth Programs is expanded to include 14 to 24 year olds (current WIA youth eligibility is 14 to 21) to reach young adults who have become disconnected from both education and the labor market. Performance measures for summer youth employment have been simplified so that work readiness will be the only indicator of success.

This funding will provide the Department with an opportunity to work with WDBs to engage youth beyond those currently being served in the WIA Youth Program. Our intent is to promote coordination/collaboration between the WDBs and programs administered by the Department of Corrections (Adult and Juvenile Corrections), Department of Children and Families (Foster Care and Wisconsin Works), Department of Natural Resources, and DWD (Veterans, Youth Apprenticeship, Division of Vocational Rehabilitation, and Adult Apprenticeship).

### **Allowable activities**

All youth activities under the WIA Youth Program are allowable activities for the use of ARRA funds. Unless otherwise stated in this guidance, the laws and regulations for the WIA youth program apply to the ARRA. WDBs may continue to spend ARRA WIA Youth funds during PY 2009. However, DOL Employment and Training Administration is strongly encouraging states and local areas to use as much of these funds as possible to operate expanded Summer Youth Employment Programs during the summer of 2009 and provide as many youth as possible with summer employment opportunities and work experiences throughout PY2009. DWD expects that 70% of the available funds will be spent by October 1, 2009.

### **Eligibility and Performance changes**

There are two significant changes to the WIA youth program funded with ARRA:

- 1) The maximum eligible age for participation has increased from age 21 to age 24. DWD expects that WDBs will serve eligible youth in each age group from 14 to 24.

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

- 2) The work readiness performance indicator will be the only measure used to assess the effectiveness of the ARRA Summer Youth Employment Program.

### **Neediest Youth**

WIA Youth Services, including those under ARRA, should be focused on the youth most in need including: out-of-school youth and those most at risk of dropping out, youth in and aging out of foster care, youth offenders and those most at risk of court involvement, homeless and runaway youth, children of incarcerated parents, migrant youth, Indian and Native American youth, and youth with disabilities.

### **Summer Employment**

WDBs should have already begun recruiting and determining eligibility for participation in the Summer Youth Employment Program. However, the first date of service for ARRA Summer Youth Employment should be no earlier than May 1, 2009. WDBs are encouraged to maximize spending of ARRA WIA funds for 2009 Summer Youth Employment Programs.

For purposes of the ARRA funds, the period of summer is defined as May 1 through September 30. Per TEGL 14-08, "summer employment" may include any set of allowable WIA Youth services that occur during the period of summer (May 1 through September 30) provided it includes a work experience component.

WDBs are encouraged to reach out broadly to engage other community partners and programs in providing referrals for possible participants in the Summer Youth Employment Program. It is the Department's intent that targeted populations outlined below are informed of and have the opportunity to participate in Summer Youth Employment Programs.

### **Targeted Populations**

The expansion of the age eligibility to age 24 provides an opportunity to engage targeted populations and to coordinate with our program partners in providing employment and training services.

*Veterans* – Given the expanded age range, WDBs have the opportunity to serve an increased number of veterans and their spouses. Priority of service requirements apply. If WDBs are interested in receiving referrals, please contact the Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program Representatives in your area. Here is the link to the DWD Veterans Office staff: <http://www.dwd.state.wi.us/veterans/vetreprs.htm>.

*Low income and TANF eligible individuals* – Another target group is low income and TANF eligible (W-2) individuals. WDBs should work with their local county human and social service agencies and W-2 agencies to determine who might be appropriate candidates from among the Food Share, Medicaid and W-2 participants.

*Registered Apprentices* – Pre-apprenticeship training programs provide the opportunity for a hands-on training experience that provides an introduction to the skills and knowledge needed in a potential career field and prepares young adults to be eligible for formal apprenticeship programs. Summer employment experiences may include pre-apprenticeship programs. To contact your local apprenticeship training representatives, please visit DWD's website at

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

<http://www.dwd.state.wi.us/apprenticeship/contacts.htm> for information on how to incorporate these opportunities in your Summer Youth Employment Programs.

*Youth Apprentices* – The Youth Apprenticeship Program may include individuals who, as part of their Youth Apprenticeship program, (<http://www.dwd.state.wi.us/youthapprenticeship/>) need to participate in a work experience activity. DWD has communicated with our Youth Apprenticeship Coordinators regarding this potential summer employment opportunity and have asked them to work with their local WDBs in referring potential participants. Below is a link to the YA coordinators list: <http://www.dwd.state.wi.us/youthapprenticeship/coordinators.htm>.

*Youth with disabilities* – Division of Vocational Rehabilitation (DVR) staff may be contacting WDBs regarding DVR clients who would meet the WIA ARRA Youth program eligibility requirements and could benefit from summer employment. If you have questions regarding this, you may contact:

- Cynthia Cain, DWD/DVR, (262) 548-5880 or Deanna Krell, DWD/DVR, (262) 548-5871
- Steve Gilles, Department of Public Instruction, (608) 266-1146

*Juvenile offenders* – For information about working with juvenile offenders, please contact Mary Ratz, Employment Programs Coordinator, Department of Corrections/Division of Juvenile Corrections, (608) 376-0115.

*Out of school youth* – The requirement that a minimum of 30% of WIA Youth Program funds be spent on out-of-school youth applies to the ARRA Youth Program funds.

### **Program Design and Flexibility**

The design framework of local youth programs must provide a comprehensive objective assessment of each youth participant, including a review of the academic and occupational skill levels, as well as the service needs of each youth. In addition, an Individual Service Strategy (ISS) must be developed for each youth participant identifying age-appropriate career goals and consideration of the assessment results for each youth. Flexibility is only allowed for those individuals during the summer months only funded exclusively with ARRA funds.

WDBs will have program design flexibility in the following areas:

- Determining which WIA Youth Program elements they provide;
- Determining whether the 12 month follow-up period will be required for youth served with ARRA funds during the period of summer as defined above. However, WDBs should provide follow-up services when deemed appropriate.
- Determining the type of assessment and Individual Service Strategy (ISS) for youth served with ARRA funds during the summer months only and provide the type of assessment deemed appropriate for each individual.
- Determining whether academic learning must be directly linked to a summer employment opportunity.

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

### Procurement

If the WDB is the grant recipient/fiscal agent for the ARRA Youth funds and has opted to administer the Summer Youth Employment Program themselves, nothing further needs to be done. However, if that is not the case, WDBs must competitively select the providers to administer the Summer Youth Employment Program. DWD does not anticipate requesting a waiver for the procurement requirements.

### Performance tracking

WDBs must determine whether a measureable increase in work readiness skills has occurred. When determining this, WDBs should follow the definition for a work readiness skill goal (see TEGl 17-05, Attachment B Definition of Key Terms):

- *Work readiness skills goal* – a measurable increase in work readiness skills including world-of-work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters.) They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along and working well with others, exhibiting good conduct, following instructions and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem-solving skills, and acquiring an improved self-image.

WDBs should choose from a variety of assessment tools including worksite supervisor evaluations, work readiness skill checklists administered by program staff, portfolio assessments, and any other relevant forms of assessing work readiness skills.

### Worksite development

Ensuring proper selection and supervision of worksites is vital to the success of the ARRA Summer Youth Employment Program. In addition, it is critical that work experience arrangements do not unfavorably impact current employees and do not impair existing contracts for services or collective bargaining agreements. Work experience of participants (both during summer employment and other work experience placements funded with ARRA) must not replace the work of employees who have experienced layoffs. Youth summer employment should be a work experience intended to increase work readiness skills of participants and not impact the profit margin of a for-profit company. ETA recommends adopting selection criteria to ensure that one employer is not favored at the expense of another employer.

In developing worksites, WDBs may use a combination of public sector, private sector, and non-profit summer employment opportunities. WDBs should work closely with their city, county and other units of government to develop worksites. Use existing community resources for referrals and private and public employer connections (for example, Youth Apprenticeship program, Boys and Girls Clubs, Urban League, Community Action Agencies, YouthBuild, Vets, Pre-Apprenticeship Programs, Wisconsin Regional Training Partnership).

## **ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

Section 1604 of the ARRA specifically states that WDBs are not allowed to use any of the ARRA funds for “any casino or other gambling establishment, aquarium, zoo, golf course, or swimming pool.” WDBs should not place a youth funded with ARRA in summer employment or work experience in any of these facilities.

### **Workplace guidelines**

WDBs should adhere to current workplace safety guidelines, child labor laws, and the minimum wage guidelines.

WDBs may provide wages or stipends to youth engaged in a classroom-based component as part of a summer employment opportunity. WDBs must have a policy related to issuing stipends to youth.

### **Incorporating Green Work Experiences**

ARRA funds provide an opportunity for WDBs to offer youth training opportunities in “green jobs.” We encourage WDBs to work with their local technical colleges to map “green” educational and career pathways to determine appropriate training opportunities and coursework for “green” jobs. Broadly defined, “green jobs” is “employment associated with some aspect of environmental improvement.” These jobs could be in fields as diverse as agriculture, manufacturing, construction, installation and maintenance, as well as scientific and technical, administrative, and service-related activities that contribute substantially to preserving or restoring environmental quality.<sup>3</sup>

### **Focus on training**

The ARRA Summer Youth Employment Program should be more than just a work experience program, especially for the 18 to 24 year old participants. WDBs must spend at least 25% of their ARRA Youth funds on training with a focus on Adult Basic Education, GED or HSED training, or work readiness certification activities. The intent is to prepare these young people for movement into unsubsidized employment particularly as we begin to see economic improvement.

### **Continued Services Supporting Older/Out-of-School Youth During Non-Summer Months**

The out-of-school 16 to 24 year old population “experience among the highest rates of unemployment and their future labor market prospects are poor given their lack of education and work experience.” Governor Doyle believes that provision of meaningful work experiences and continued engagement of this population after the summer period as defined in ARRA is vital to the success of these young people. The Governor also believes that this significant investment of ARRA funds presents an extraordinary and unique opportunity for the workforce system to accelerate its transformational efforts and demonstrate its ability to innovate and implement effective service delivery strategies for this at-risk population.

For older and out-of-school youth who are not returning to school following the summer months, WDBs should consider work experiences and other appropriate activities beyond the summer months, including training opportunities and reconnecting to academic opportunities through

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<sup>3</sup> Staff Report – Green Jobs: A Pathway to a Strong Middle Class, Middleclass Taskforce, chaired by Vice President Joe Biden.

## **ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION**

multiple education pathways. Use of the career pathway model as defined in DWD's RISE initiative will help ensure this. The career pathway is a new way of organizing a postsecondary program as a sequence of modules that leads learners in steps toward a degree or technical diploma. Each step increases skills and improves the learner's career and earning opportunities. Industry sectors that are appropriate for pathway development are those that need skilled workers and contribute to the economic growth of the region. Bridge instructional programming helps adults with basic skills or English Language Learning (ELL) needs take the first step onto career pathway learning and work. Bridge programs explicitly link Adult Basic Education (ABE) and ELL instruction with preparation for postsecondary education and occupational skill attainment. To support low-income workers in career pathway learning, employers, workforce development agencies, educational institutions, and other community organizations actively collaborate to provide training resources and wrap-around support services to the learner as well as reinforce the value of continuing along the pathway.

### **Waivers**

DWD will submit a waiver plan to ETA to request that ETA waive the youth performance measures for out-of-school youth ages 18 to 24 served with ARRA funds beyond the summer months who participate in work experience only. This will allow the use of the work readiness indicator as the only indicator of performance for these youth, the same measure that applies to summer youth only participants. The waiver would only be applicable for the first six months following the summer of 2009 (i.e., October to March).

### **Work Opportunity Tax Credit**

WDBs should promote the Work Opportunity Tax Credit (WOTC) as an incentive for employers to hire older and out-of-school youth transitioning to the workplace following work experiences. ARRA expands the WOTC to disconnected youth ages 16 to 24 who are not regularly attending school, not readily employed, and lacking basic skills.

### **Allocations**

WIA ARRA Youth allocations are found in Attachment 1. The expenditure period for ARRA WIA Youth funds is February 17, 2009 through June 30, 2010. However, WDBs must expend at least 70% of the funds by October 1, 2009 leaving 30% of the funds to be dedicated to year-round activities. DWD may recapture and reallocate funds to ensure ARRA funds are expended by the June 30, 2011 deadline for the use of PY2008 funding specified in TEGL 14-08.

DWD expects to receive the Program Year 2009 WIA Allocations in the near future and will issue those amounts expeditiously. DOL expects coordination and concurrent expenditure of this fund source with WDB ARRA allocations.

### **WIA Local Plan Guidelines**

In February, DWD issued the Program Year 2009 WIA Local Plan Guidelines. Through a separate communication, WDBs will receive an ARRA WIA Local Plan Guidelines supplement.

### **CORe reporting**

There are a number of new ARRA codes that have been created to track the ARRA funds. Please carefully review your ARRA grant agreement regarding this.

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

### Tracking in ASSET

Individuals served with ARRA funds must be tracked in ASSET. DWD will be issuing further guidance on this in the near future.

### Branding and Acknowledgements

Any materials, documents or reports created using ARRA funds shall contain the ARRA symbol and give credit to ARRA and DWD for funding.

**ACTION SUMMARY STATEMENT:** Implement the ARRA Summer Youth Employment Program as outlined in this Administrator's Memo, WIA law and regulations, and DOL-issued guidance.

**CONTACT:** For program questions, contact your Local Program Liaison. For fiscal questions, contact Nancy Eilks.

**American Recovery & Reinvestment Act  
Youth Allocations by WDA**

WDA Name		Youth		
			Share	Allocation
1	Southeast		8.44%	\$990,638
2	Milwaukee		36.29%	\$4,260,036
3	WOW		4.63%	\$543,067
4	Fox Valley		6.30%	\$739,060
5	Bay Area	X	7.77%	\$912,114
6	North Central		6.64%	\$779,402
7	Northwest		6.70%	\$786,846
8	West Central		6.87%	\$806,099
9	Western	X	3.00%	\$352,081
10	South Central	X	8.24%	\$966,801
11	Southwest		5.12%	\$601,346
	Total		100.00%	\$11,737,490

X Held Harmless

Source: US DOL TEGL 13-08, March 2009

Update October 20, 2009

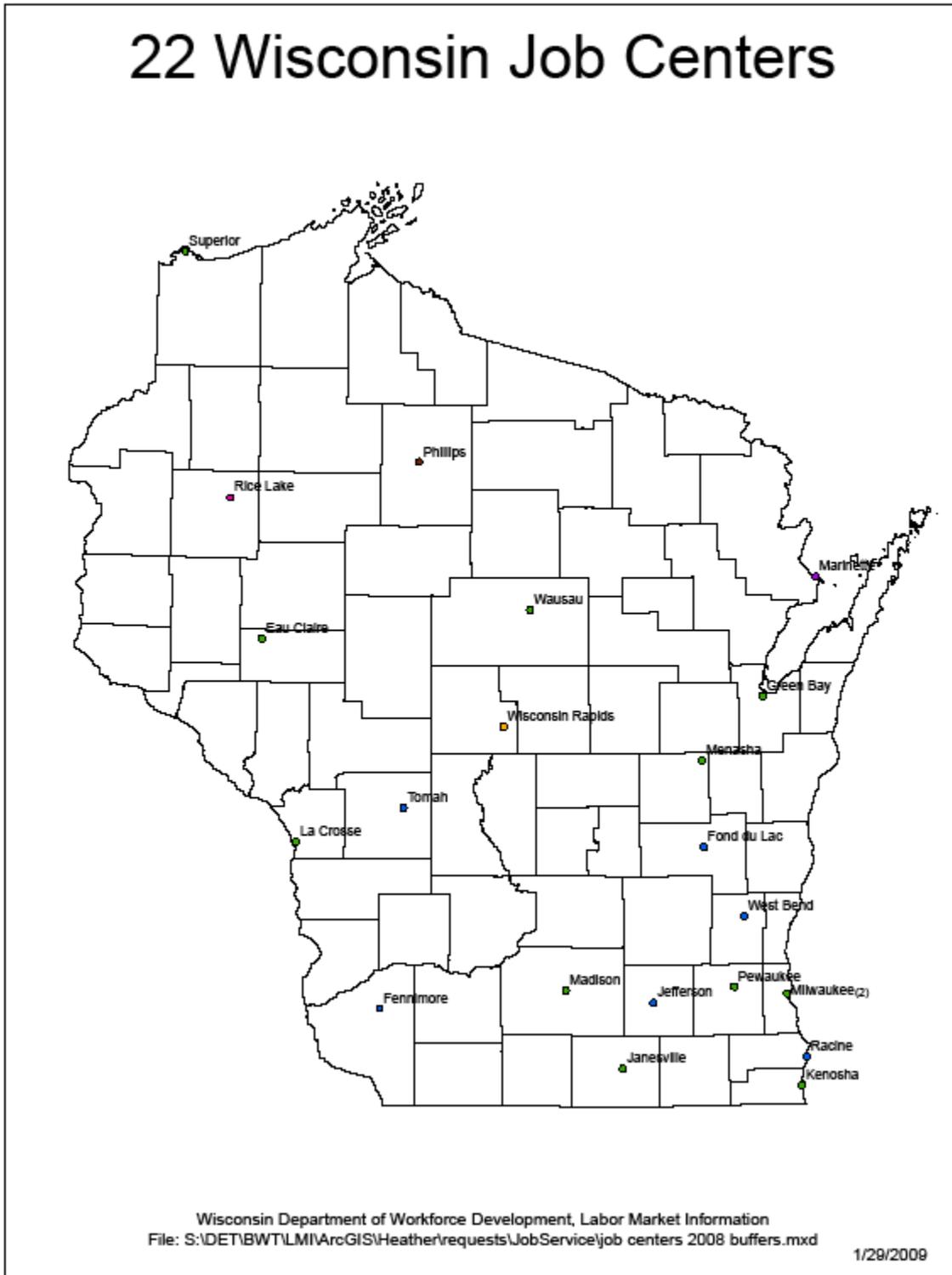
### Workforce Investment Act Allocations by WDA: ARRA Act Fund -1a

WDA Name		Adult		Youth		Dislocated Worker				
		Share	Allocation	Share	Allocation	Share	Allocation			
1	Southeast		10.10%	\$445,000		10.60%	\$1,243,882		7.72%	\$743,823
2	Milwaukee		32.22%	\$1,419,595		32.35%	\$3,796,842		19.03%	\$1,833,850
3	WOW	X	3.06%	\$134,792	X	2.94%	\$345,298	X	5.59%	\$539,088
4	Fox Valley	X	5.27%	\$232,429	X	5.11%	\$600,226		11.39%	\$1,097,147
5	Bay Area		11.04%	\$486,573		11.15%	\$1,308,552		12.10%	\$1,166,024
6	NorthCentral		8.56%	\$377,119		8.71%	\$1,022,662		8.91%	\$858,107
7	Northwest		9.18%	\$404,415	X	6.51%	\$763,584		4.28%	\$412,090
8	West Central	X	5.33%	\$234,986	X	6.47%	\$758,876	X	6.60%	\$635,632
9	Western	X	2.91%	\$128,441	X	3.00%	\$352,081		4.06%	\$391,671
10	South Central	X	6.59%	\$290,325	X	7.29%	\$855,141		11.74%	\$1,131,318
11	Southwest		5.73%	\$252,601		5.88%	\$690,347		8.58%	\$827,014
	Total		100.00%	\$4,406,276		100.00%	\$11,737,490		100.00%	\$9,635,764

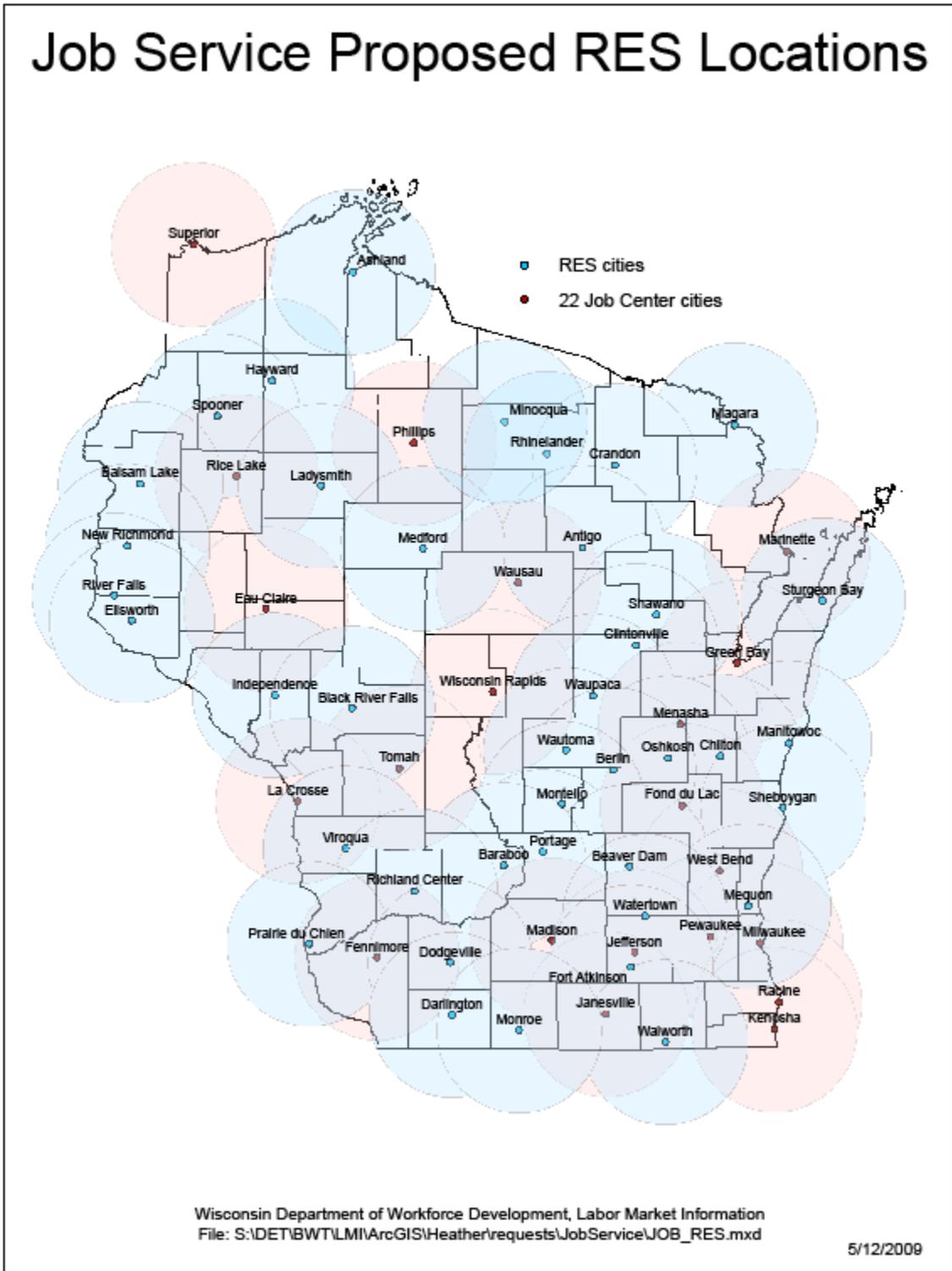
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Source: US DOL NOO March 19, 2009

Attachment F



Attachment G



# ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

## Attachment H

May 28, 2009

### Veteran Program Policy Letter 2-09

**TO: Workforce Development Board Directors  
DET Managers and Supervisors  
Office of Veterans Services Staff  
DVET(DOL/VETS)**

**FROM: Roberta Gassman, Secretary  
Ron Danowski, DET, Administrator  
Kenneth Grant, Director – Office of Veterans Services**

**SUBJECT: Final Rule on the Implementation of Veteran's Priority of Service and Performance  
Goals for all DOL and the Recovery Act funded programs**

**I. PURPOSE:** The issuance of a final rule to implement "Priority of Service" in qualified job training programs prescribed in section 2(a)(1) of the Jobs for Veterans Act (JVA). The final rule was issued on December 19, 2008 and became effective on January 19, 2009. In addition, this VPL also provides guidance and direction regarding the American Recovery and Reinvestment Act of 2009 ("the Recovery Act") funding for activities authorized under the Workforce Investment Act of 1998 (WIA) and the Wagner-Peyser Act.

**II. REFERENCES:** 'Jobs for Veterans Act' (Public Law 107-288), dated November 7, 2002.

Implementing the Veteran's Priority Provisions of the 'Jobs for Veterans Act' (P.L. 107-288), USDOL, ETA, TEGL No. 5-03, dated September 16, 2003.

[http://www.ows.doleta.gov/dmstree/teg/teg/2k3/tegl\\_05-03.htm](http://www.ows.doleta.gov/dmstree/teg/teg/2k3/tegl_05-03.htm)

Implementing the Veteran's Priority Provisions of the 'Jobs for Veterans Act' (P.L. 107-288), DWD, JSB, and VPL 1-05, dated April 13, 2005.

Implementation of Veteran's Priority Performance Goals for all DOL funded programs, DWD, Veteran's Unit, VPL 1-07, dated March 19, 2007.

Priority of Service for Covered Persons; Final Rule, 20 CFR 1010 published in Federal Register 78132, December 19, 2008.

<http://www.dol.gov/vets/E8-30166.pdf>

Overview of the Employment and Training Administration's Implementation Strategy for Workforce Investment Act and Wagner-

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

Peyser funding under the American Recovery and Reinvestment Act of 2009, TEGL 30-08, ETA, USDOL, March 4, 2009.

<http://www.naswa.org/recovery/overallguidance.cfm>

Allotments for Training and Employment Services as specified in the American Recovery and Reinvestment Act of 2009 (Recovery Act) for activities under the Workforce Investment Act of 1998 (WIA). Workforce Investment Act Adult, Dislocated Worker and Youth Activities Allotments; Wagner-Peyser Act Allotments, and Reemployment Service (RES) Allotments, TEGL 13-08, ETA, USDOL, March 6, 2009.

<http://www.naswa.org/recovery/overallguidance.cfm>

Guidance for Implementation of the Workforce Investment Act and Wagner-Peyser Act Funding in the American Recovery and Reinvestment Act of 2009 and State Planning Requirements for Program Year 2009, TEGL 14-08, ETA, USDOL, March 18, 2009.

<http://www.naswa.org/recovery/overallguidance.cfm>

American Recovery and Reinvestment Act (ARRA) of 2009: Workforce Investment Act (WIA) Adult and Dislocated Worker Programs, WIA Administrator Memo 9-02, dated April 16, 2009

### III. RECISSIONS:

Implementing the Veterans' Priority Provisions of the "Jobs for Veterans Act" (P.L. 107-288), State Veteran Program Letter No. 3-04, and Job Service Bureau, dated October 1, 2003.

WIA Policy Update 4-03: Veterans' Priority of Service in Workforce Investment Act (WIA) Title I Adult Programs, Bureau of Workforce Programs, DWS, dated February 13, 2004.

Implementing the Veterans' Priority Provisions of the "Jobs for Veterans Act" (P.L. 107-288), State Veteran Program Letter No. 01-05, and Job Service Bureau, dated April 13, 2005.

### IV. BACKGROUND:

***Unless notated, VPL 2-09 summarizes 'Priority of Service for Covered Persons', Final Rule, 20 CFR 1010 published in Federal Register 78132, December 19, 2008.*** The 'Jobs for Veterans Act' (P.L. 107-288), which was enacted on November 7 2002, established "priority of service" requirements for all United States Department of Labor (USDOL) Employment and Training programs.

The Job for Veterans Act (JVA) provides that veterans and eligible spouses of veterans (as defined in § 1010.110) are identified as covered persons and are entitled to priority over non-covered persons for the receipt of employment, training, and placement services provided under new or existing qualified job training programs, notwithstanding any other provision of law. The JVA defines qualified job training programs as 'any workforce preparation, development or delivery program or service that is

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

directly funded, in whole or in part, by the U.S. Department of Labor” 38 U.S.C. 4215(a) (2). Currently, such programs are offered by many agencies with the USDOL, including, but not limited to, Employment and Training Administration (ETA), Veterans Employment & Training Service (VETS), the Women’s Bureau, and the Office of Disability Employment Policy (ODEP).

The JVA, and the priority of service it requires, is an important acknowledgment of the sacrifices of the men and women who have served in the U. S. Armed Forces. USDOL’s strategic vision for priority of service to covered persons honors veterans and eligible spouses of veterans as our “heroes at home” and envisions that USDOL-funded employment and training programs, including the publicly funded workforce investment system, ***will identify, inform and deliver comprehensive services to covered persons as part of strategic workforce development activities across the State of Wisconsin.***

In Wisconsin, the Job Centers are the delivery point for a significant percentage of qualified job training programs and services covered by the JVA and ***are required to implement priority of service. All Job Centers should have clear strategies for providing veterans and eligible spouses of veterans with the highest quality of service at every phase of services offered.*** This can range from basic functions, such as assistance with job search and identification of needed skills, to more customized initiatives such as creating career pathways. USDOL expects that the One-Stop System will draw on all available resources to support the reemployment needs of covered persons.

Veterans and their eligible spouses have specific needs and concerns that can be addressed by USDOL-funded employment and training program providers developing strategies for serving covered persons. When military service has ended, a major concern for many veterans is obtaining a good job. Some veterans may experience particular difficulty, both in finding employment and in readjusting to civilian work environments. USDOL-funded employment and training programs should work with employers to ensure that the value a veteran brings to the table is understood and to address any concerns that employers may have about hiring veterans.

In addition to assisting recently separated veterans and eligible spouses to meet the challenges of their specific situation, priority of services also is intended to assist those veterans and eligible spouses for whom military service concluded some time ago. These veterans and eligible spouses are likely to have significant civilian labor market experience. However, they experience dislocation or find that they are underemployed relative to their skills and experience. ***Priority of service is intended to assist all veterans and eligible spouses to improve their civilian sector***

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

***employment and earnings. Priority of service does not change a program's intended functions; covered persons still need to meet all statutory eligibility and program requirements for participation.***

The Recovery Act contains several provisions designed to provide services to targeted populations. Priority use of Workforce Investment Act (WIA) adult formula funds under the Recovery Act must be for services to recipients of public assistance and other low-income individuals as described in WIA section 134(d)(4)(E) ((see section 11.B. of Training and Employment Guidance Letter (TEGL) 14-08)). Section 11.C. of TEGL 14-08 also discusses the interaction of this priority with the 'veterans' priority' under the Jobs for Veterans Act. Basically the TEGL states that "veterans and eligible spouses who are members of the Recovery Act priority group must receive the highest priority within that priority group, followed by non-veteran members of the Recovery Act priority group.

**V. ACTIONS REQUIRED:** Within the guidelines established in Section 2(a) of the Act 38 U.S.C. 4215(a) which created a "priority of service" for veterans (and some spouses) "who otherwise meet the eligibility requirements for participation" in all USDOL programs identified in TEGL 3-05. Local performance goals are established in Veteran's Program Policy Letter (VPPL) 1-07, Attachment A, column F based on the incidence of the veteran population 18-64 (as a per cent of the total population age 18-64).

The policy or policies must require that processes are in place to ensure that covered persons are identified at the point of entry and given an opportunity to take full advantage of priority of service. These processes shall be undertaken to ensure that covered persons are aware of:

1. Their entitlement to priority of service;
2. The full array of employment, training, and placement services available under priority of service; and
3. Any applicable eligibility requirements for those programs and/or services.

Monitoring priority of service will be performed jointly between the Veterans' Employment and Training Service (VETS), and the USDOL agency responsible for the program's administration and oversight.

Recipients of funds for qualified job training programs must implement processes in accordance with § 1010.300 to identify covered persons at the point of entry, whether in person or virtual, so the covered person can be notified of their eligibility for priority of service. Since qualified job training programs may offer various types of services including staff-assisted services as well as self-services or information activities, recipients also must ensure that

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

priority of service is implemented throughout the full array of services provided to covered persons by the qualified job training program.

Every recipient of funds for qualified job training programs must collect such information, maintain such records, and submit reports containing such information and in such formats as the USDOL Secretary may require related to the provision of priority of service. Recipients must collect two broad categories of information:

1. For the qualified job training programs specified in paragraph 1.a. of this section, information must be collected on covered persons from the point of entry, as defined in § 1010.300 (a).
  - a. For purposes of paragraph 1 of this section, qualified job training programs that serve veterans (currently the Wagner-Peyser, WIA Adult, WIA Dislocated Worker, WIA National Emergency Grant, and Senior Community Service Employment Programs) must collect information and report on covered entrants. The Trade Adjustment Assistance (TAA) Program must collect information and report on covered entrants on the effective date of the next information collection requirement applicable to that program.
  - b. All recipients must collect and maintain data on covered and non-covered persons who receive services, including individual record data for those programs that require establishment and submission of individual records for persons receiving services.
2. For all qualified job training programs, including the programs specified in paragraph 1.a. of this section. Information must be collected on covered and non-covered persons who receive services, as prescribed by the respective qualified job training programs, as provided in paragraph 1.b. of this section.

to:

The information to be collected shall include, but is not limited

- a. The covered and non-covered person status of all persons receiving services;
- b. The types of services provided to covered and non-covered services;
- c. The dates that services were received by covered and non-covered persons; and;
- d. The employment outcomes experienced by covered and non-covered persons receiving services.

Except as provided in paragraph 2. b. of this section, for persons receiving services, recipients must apply the definitions set forth in § 1010.10 to distinguish covered from non-covered persons receiving services and, within covered persons, to distinguish veterans from eligible spouses.

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

Under TEGL 14-08 “the Recovery Act” states that States and local areas must incorporate priority of services for veterans and eligible spouses sufficient to meet the requirements of 20 CFR part 1010, published at Fed. Reg. 78132 on December 19, 2008, the regulations implementing priority of service for veterans and eligible spouses in Department of Labor job training programs under the Jobs for Veterans Act. Under sec. 1010.310(b) (3) of these regulations, when the veterans priority is applied in conjunction with another statutory priority like the Recovery Act’s priority for recipients of public assistance and low-income individuals, veterans and eligible spouses who are members of the Recovery Act priority group must receive the highest priority within that priority group, followed by non-veteran members of the Recovery Act priority group.

Under DWD Administrator’s Memo 9-02, states that WDBs must incorporate priority of services for veterans and eligible spouses sufficient to meet the requirements of 20 CFR part 1010, published at Fed. Reg. 78132 on December 19, 2008, the regulations implementing priority of service for veterans and eligible spouses in Department of Labor job training programs under the Jobs for Veterans Act. Under sec. 1010.310(b) (3) of these regulations, when the veteran’s priority is applied in conjunction with another statutory priority like the Recovery Act’s priority for recipients of public assistance and low-income individuals, veterans and eligible spouses who are members of the Recovery Act priority group must receive the highest priority within that priority group, followed by non-veteran members of the priority group. The WDBs’ priority of service policies for qualified veterans and their spouses under the Job for Veterans Act continue to apply. Upon, the DET Office of Veterans Services issuing a new Veteran Program Letter (VPL), WDBs must review their policies for compliance with the VPL and revise them accordingly.

**VI. INQUIRIES:** Inquiries regarding this Veteran Program Policy Letter should be made to the State Veterans Program Manager, Office of Veteran Services, Division of Employment and Training, Department Workforce Development, 201 E. Washington Ave., Room G100, P.O. Box 7972, Madison, WI 53707.

**VII. EFFECTIVE DATE:** Immediately.

**VIII. EXPIRATION DATE:** Continuing.

# ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

## Attachment I

### Charge Council on Workforce Investment Medicaid Infrastructure Grant Subcommittee

Adopted by the Council on March 27, 2009

#### Background

Wisconsin has achieved a number of advances in promoting community integration of people with disabilities particularly in domicile choices, and the resource options people need for independence. However, many adults with disabilities do not have a full range of opportunities for employment in work settings that are typical of other adults in their communities: Jobs leading to self sufficiency, or, family-sustaining wages that reflect individual choices and career ambitions. A high quality, continuously improving and comprehensive workforce system in Wisconsin must meet the needs of people with disabilities who choose to work.

At the same time, Wisconsin recognizes that economic health, growth and global competitiveness are dependent on a highly skilled workforce, capable of attracting and sustaining quality industries. Economic growth is dependent on education and training that matches the skill-sets needed to expand existing businesses as well as a pipeline of talent for emerging industries. To those goals, initiatives such as Regional Industry Skills Education, Career Pathways and Medicaid Infrastructure Grant activities merging into the current infrastructures will help create a more sophisticated collaborative workforce system.

People with disabilities, provided with effective supports, must be an integral part of the 21<sup>st</sup> Century workforce with full access to the broadest range of employment opportunities. This is an essential part of Governor Doyle's "Invest in People" strategy: To maximize people's potential through quality education and training that will, in turn, ensure Wisconsin has a highly skilled workforce that supports job growth and business development.

#### Purpose

The Council on Workforce Investment Medicaid Infrastructure Grant Subcommittee (CWI-MIG) will advise the Department of Health Services (DHS) on the implementation of the State's Medicaid Infrastructure Grant (MIG). The committee will also monitor the implementation of the recommendations of the Managed Care and Employment Task Force (MCETF).

The mission of MIG is to enhance Wisconsin's employment and training delivery system that:

- maximizes employment for people with disabilities;
- increases the state's labor force through the inclusion of people with disabilities; and
- protects and enhances workers' healthcare, other benefits and needed supports.

The Managed Care and Employment Task Force was charged with identifying an effective infrastructure in the context of Wisconsin's developing managed long term care system that promotes and supports a wide range of employment options, and an individualized approach to supporting each person's identified employment outcome. The Task Force presented to the Wisconsin Department of Health Services a final report containing 84 recommendations that are intended to ensure best practices for supporting and facilitating a broad range of quality employment choices and outcomes for participants in the long term care system. The recommendations are divided into two groups:

## ARRA ADDENDUM TO WISCONSIN'S WIA STATE PLAN MODIFICATION

- recommendations related to improving the managed long-term care system's infrastructure and broader community collaborations, and
- recommendations related to improving the experiences and outcomes of individual consumers

### Activities

The CWI-MIG Subcommittee will:

1. Provide advice, guidance and recommendations for action to the Departments in carrying out the general activities of MIG and the specific activities that address the 84 MCETF recommendations.
2. Monitor and review the implementation of the 84 MCETF recommendations.
3. Be provided with work plans for all MIG projects and advance copies of MIG submissions to the grant funder, the Centers for Medicare and Medicaid Services.
4. Be provided with reference and project materials and presentations.
5. Meet quarterly.
6. Be supported by staff from the Department of Workforce Development's Division of Employment and Training/ Bureau of Workforce Training and DHS's Division of Long Term Care/ Office of Independence and Employment.

Attachment J

# WORKFORCE INVESTMENT ACT

## LOCAL PLAN GUIDELINES SUPPLEMENT FOR THE

## AMERICAN RECOVERY AND REINVESTMENT ACT

**May 2009**



Submit Plan To:

Nancy Eilks, Auditor  
Department of Workforce Development  
Division of Employment and Training  
P.O. Box 7972, Room G100  
Madison, Wisconsin 53707  
(608) 267-2985

Submit By:

**June 1, 2009**

**WORKFORCE INVESTMENT ACT**  
**LOCAL PLAN GUIDELINES SUPPLEMENT**

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## Purpose

The purpose of this Workforce Investment Act (WIA) Local Plan Guidelines Supplement is for local areas to address how they will utilize funding under the American Recovery and Reinvestment Act (ARRA) of 2009 (referred to as “Recovery Act”) to meet the growing demand for workforce development services.

The modifications to the Local Plans described in these guidelines and the information gathered through the WIA performance and reporting systems will be important sources of information to ensure transparency and accountability for use of Recovery Act funding.

## Background

The Recovery Act, signed by President Obama on February 17, 2009, is intended to preserve and create jobs, promote the nation’s economic recovery, and to assist those most impacted by the recession. With the additional workforce funding provided in the Recovery Act, and the increased employment and training services such funding will support, the workforce system will play a vital role in America’s economic recovery by assisting workers who are facing unprecedented challenges to retool their skills and re-establish themselves in viable career paths.

In utilizing the funding in the Recovery Act, all levels of the workforce system must be guided by four principles:

- Transparency and accountability in the use of Recovery Act funding;
- Expedited and effective use of the funds, with expenditures made concurrently with regular formula funds;
- Emphasis on training and innovative and invigorated service delivery strategies; and
- Emphasis on services for hard-to-serve populations and needs-related payments.

## Introduction

States and Workforce Development Areas (WDAs) are expected to spend Recovery Act funding quickly and effectively. It is Congress’ intent, as well as the Obama Administration, that the majority of these funds will be utilized within the first year of availability. Congress intends that Recovery Act funds be spent concurrently with standard formula funds to greatly increase the capacity of the workforce system to serve workers in need. It is the intent of the Recovery Act that substantially increased numbers of adults and dislocated workers will be served with the infusion of formula funds, and that training will be a significant area of focus. WDBs should ensure that supportive services and needs-related payments are available to support the needs of hard-to-serve populations. The purpose of the youth funding is to provide opportunities for summer employment in addition to year-round activities. Service delivery strategies should be focused on innovative and effective approaches that both meet the demands of today’s economy and result in an improved workforce system for tomorrow’s global economy.

## Requirements for Completing the Plan

Consistent with the emphasis on broad collaboration and input into plan development, the WIA requires that the Workforce Development Board (WDB) make copies of the Local Plan available for public comments in each county in the WDA. The public comment period can occur immediately following the June 1, 2009 deadline for submittal of the plan to the Department of Workforce Development (DWD). Any revisions to the Local Plan due to public comments are due to DWD by July 1, 2009.

Public comment, at a minimum, is to consist of the following procedures:

- Copies of the Local Plan made available to the public in each county in the WDA through such things as public hearings, local news media and local websites.
- Members of the public and the WDB, including business and labor organizations, have an opportunity to comment on the Plan.
- A thirty (30) day period, immediately following the submission of the Plan to DWD, is allowed for comment from the public.
- The WDB makes information about the Plan available to the public on a regular basis through open meetings.
- Any public comments that express disagreement with the Plan and the WDB's response to those comments are to be submitted to DWD by July 1, 2009. In addition, the WDB must submit a copy of the published notice.

Each Plan is to follow the format of these guidelines:

- All pages numbered, including attachments
- A Table of Contents, which identifies the name and page number for each section
- Single spaced, double-sided, 11 point font on 8.5 x 11 white paper
- Microsoft Word document
- A maximum of 50 pages, excluding attachments
- Stapled or three-hole punched, not bound

#### Submittal Requirements

**Submit an original, three hard copies and one copy by email by 4:30 P.M. on June 1, 2009 to:**

Nancy Eilks, Auditor  
Department of Workforce Development  
Division of Employment and Training  
P.O. Box 7972, Room G100  
Madison, Wisconsin 53707  
(608) 267-2985  
[nancy.eilks@dwd.wisconsin.gov](mailto:nancy.eilks@dwd.wisconsin.gov)

#### Review and Approval of the Plan

Upon submission, all plans will be reviewed immediately for completeness. If there is a problem, WDBs will be notified within one week. The content of plans will be reviewed and approved by July 15, 2009, unless DWD, the Governor's designee, determines in writing that: (1) there are deficiencies in local workforce investment activities that have not been addressed, or (2) the plan is determined inconsistent with Title I and the regulations of WIA, including required public comment provisions.

Modification Procedures

Each Local Plan is considered a living document that may need to be modified over the course of the year. As required in §661.355 of the WIA Final Regulations, DWD, acting on behalf of the Governor, has established procedures for modifying local plans. These requirements are outlined in DWD policy 03-02.

Key Dates

*Local Plan Guidelines Supplement* Issued ..... May 19, 2009  
Local Plan Supplement Due ..... June 1, 2009  
Local public comment period begins..... June 1, 2009  
Public comments and revisions of Local Plan, if any, due ..... July 1, 2009  
Local Plan Addendum Approved ..... July 15, 2009

Assistance

If you have questions, or would like assistance, please contact:

Dianne Reynolds      (608) 266-0988

The Local Program Liaison assigned to your WDA:

Theresa Loerke      (608) 264-8179  
Karen Pfeil      (608) 266-9663

## **I. Overview**

### **A. Recovery Act Implementation**

1. Describe the WDB's vision to use Recovery Act funds to drive change throughout the local workforce system to meet 21<sup>st</sup> century workforce and economic challenges.
2. Describe the WDB's involvement in designing and implementing the Recovery Act program.
3. Describe the Youth Council's involvement in designing, selecting service providers, and implementing the Recovery Act Youth program.
4. Describe current or planned communication and coordination activities with other agencies doing Recovery Act activity.
5. Describe plans and policies to ensure emphasis on serving low-income, displaced, and under-skilled adults and disconnected older youth.
6. Describe goals that reflect the need to expand services and increase the numbers of individuals trained and served.

### **B. One-Stop Readiness**

1. Describe plans to ensure the Job Centers have the staff and systems, including bilingual staff, to serve the increased numbers of customers to meet Recovery Act expectations and local economic demand.
2. In the context of a low-growth economy, describe planned changes to training strategies that address longer-term unemployment.
3. Describe how case managers will assist diverse customers, including TANF, low-income individuals, and other targeted population such as veterans and persons with disabilities, along with dislocated workers, in matching skills competency training with job growth projections in the region.

## **II. Adult and Dislocated Worker Programs**

It is the intent of the Recovery Act that WIA Adult and Dislocated Worker funds be used to provide the necessary services to substantially increased numbers of individuals to support their entry or reentry into the job market. WDBs should consider how assessment and data-driven career counseling can be integrated into their service strategies to support individuals in successful training and job search activities that align with areas of anticipated economic and job growth. Additionally, overall enrollments in training are expected to increase significantly. Recovery Act funds can be used on all activities specified under the WIA Adult and Dislocated Worker programs.

### **A. Outreach and Recruitment**

1. Describe strategies to identify and recruit participants to be served.

2. The Job Service Reemployment Services (RES) are going to increase dramatically throughout the State. Under this statewide initiative, claimants will be triaged and offered services via one of four paths. One of those paths will be referrals, including those to WIA Title 1. Describe how Title 1 providers will communicate information about upcoming training opportunities (especially short-term training opportunities like boot camps and OJTs) to RES staff so they can make referrals as appropriate.

#### B. Target Groups

Priority use of the Adult funds shall be for services to recipients of public assistance and other low-income individuals as described in WIA section 134(d)(4)(E). Local workforce development strategies should include robust approaches to helping these workers access training and employment services that advance them along career pathways in high-growth industries.

1. Describe the strategies to outreach, recruit and serve the following populations:
  - a. Public assistance recipients
  - b. Low-income individuals
  - c. Persons with disabilities
  - d. Individuals deficient in basic skills
2. Describe the coordination efforts with organizations related to the above populations, and their coordinative roles. For example, describe collaborative partnerships with your area's Managed Care Organizations.

#### C. Services

1. Describe the planned use of funds for the Adult and Dislocated Worker programs, identifying where these plans represent services and strategies that are new, different or more expansive than those currently made available through the regular formula-funded programs. The response should also address the following:
  - a. Plans to implement expanded supportive services, including the identification of supportive services to be provided and increased local expenditure limits. Identify the broader range of supportive services, such as benefits counseling by credentialed practitioners, and other supports for improved service to all WIA/ARRA target populations. If the WDB has updated their current support service policy since submittal with the WIA Local Plan, submit the updated policy as an attachment.
  - b. Plans to develop and implement a needs-related payment policy, including how the amount will be determined (for example, through a financial planning process) and the system for tracking and issuing payments. If the WDB has updated or developed a needs-related payment policy since submittal with the WIA Local Plan, submit the policy as an attachment. (Guidance on the provision of needs-related payments to adults and dislocated workers can be found in 20 CFR 663.815 – 663.840).

2. Describe the services and resources available to assist job seekers to obtain and retain employment. These services may include, among others, business services to facilitate connections between job seekers and employers, job fairs, and job seeking skills activities (resumes, interviewing, conducting online job searches, etc.), and should be made available for participants that complete training as well as those who already have the occupational skills to compete in the current labor market. Include in your description any augmented business services such as coordination with vocational rehabilitation to ensure only one-point contact with employers, and role(s) of the WIA Navigators to support Business Services Teams' efforts with participant support and in employer education.

#### D. Training

It is the intent of the law that substantially increased numbers of adults and dislocated workers will be served with this infusion of formula funds, and that training will be a significant area of focus. Training services include occupational skills training, on-the-job training, programs that combine workplace training and related instruction, including registered apprenticeship, training programs operated by the private sector, skill upgrade and retraining, entrepreneurship training, job readiness training, adult education and literacy training, and customized training.

1. Describe the WDB's plans to implement expanded training services for adults and dislocated workers to address the following:
  - a. Promotion of assessment and training in advanced manufacturing, energy, weatherization and health care industries
  - b. Service to targeted populations
  - c. Employer-based training options (On-the-Job Training and Customized Training)
  - d. Use of short-term training along career pathways
  - e. Class-size projects
  - f. Credentials or work-ready certification
  - g. Local policies, including plans to increase locally imposed limitations on training costs or ITAs
  - h. Provision of multi-program, integrated employment goals and other strategies for specific targeted population groups.
2. Describe the WDB's plans to target Recovery Act funds for:
  - a. Adult Basic Education and basic skills training
  - b. Filling skill gaps or remediation
  - c. Bridge programs as defined in the Wisconsin RISE Initiative
  - d. Course work related to preparation toward a career goal
  - e. Co-enrolled participants in training and/or supportive services (e.g. WIA/Veteran, WIA/DVR)
3. To maximize the reach of formula funds, eligible customers should be assisted in taking advantage of the significant increase in Pell Grant funds also included in the Recovery Act. Describe policies and procedures to ensure that all eligible customers apply for Pell Grants, and other financial assistance.
4. Describe plans to expand local training capacity, including the selection of alternative training providers (such as proprietary schools, community-based organizations and registered apprenticeship).

5. To increase the availability of training to workforce system customers, the Recovery Act allows local WDBs to award contracts to institutions of higher education, such as community colleges, or other eligible training providers, if the board determines it would facilitate the training of multiple individuals in high-demand occupations and if the contracts do not limit customer choice. Describe plans to award such contracts.
6. A minimum of 70% of both the WDB's Recovery Act adult and dislocated workers allocation must be spent on training. Describe how the WDB plans to meet this goal.

#### E. Coordination

1. Dislocated workers eligible for the Trade Adjustment Assistance (TAA) program are expected to be co-enrolled in the WIA Title 1 Dislocated Worker Program. This is to ensure that the resources available through each program are maximized and a comprehensive package of services is made available to each dislocated worker. Describe how Recovery Act funds will be used to expand co-enrollment of TAA eligible participants in the WIA program and the Recovery Act funded "wrap-around" services that will be made available to eligible dislocated workers. Include a description of customer flow and the role of each program in providing assessment, employability plan development, case management, placement, training and follow-up services. Also describe other co-enrollments to serve targeted populations, such as W-2 and vocational rehabilitation participants.
2. The Department of Labor expects that Unemployment Insurance claimants are provided with a full array of services through Reemployment Services (RES), Wagner-Peyser Act, and WIA grant funding via a comprehensive and integrated service delivery model. Describe how this statewide initiative will be integrated into the local service delivery structure.

### III. Summer Youth Employment Program

While the Act does not limit the use of the Recovery Act funds to summer employment, the Congress is clearly interested in these funds being used to create summer employment opportunities for youth. The Department of Labor (DOL) strongly encourages states and local areas to use as much of these funds as possible to provide as many youth as possible with summer employment opportunities and work experiences throughout the year, while ensuring that these summer employment opportunities and work experiences are high quality. DOL is also particularly interested in and encourages the development of work experiences and other activities that expose youth to opportunities in "green" educational and career pathways.

#### A. Outreach and Recruitment

1. Describe strategies to identify and recruit participants to be served.
2. Veterans age 21 to 24 have a particularly high incidence of unemployment immediately upon discharge. Describe plans to outreach, recruit and provide services to these individuals.

## B. Target Groups

1. Describe new or additional strategies (since submittal of the WIA Local Plan) to target and serve youth most in need of services such as:
  - a. Out-of-school youth and those most at risk of dropping out
  - b. Youth in and aging out of foster care
  - c. Youth offenders and those at risk of court involvement
  - d. Homeless and runaway youth
  - e. Children of incarcerated parents
  - f. Migrant youth
  - g. Indian and Native American youth
  - h. Youth with disabilities
2. The Recovery Act funding provides an opportunity to engage youth beyond those currently being served in the WIA youth program. Describe plans to coordinate and collaborate with the following:
  - a. Department of Corrections (Adult and Juvenile Corrections)
  - b. Department of Children and Families (Foster Care and Wisconsin Works)
  - c. DWD Veterans' staff
  - d. Youth Apprenticeship
  - e. Division of Vocational Rehabilitation
  - f. Adult Apprenticeship
  - g. Department of Health Services
3. The Recovery Act increases the age eligibility to a maximum of 24 years old. Describe additional services and strategies for youth ages 21-24.

## C. Services

1. Describe the planned use of funds for the youth program, identifying where these plans represent services and strategies that are new, different or more expansive than those currently made available through the regular formula-funded youth program.
2. A minimum of seventy percent of the WDB's Recovery Act youth allocation must be spent by October 1, 2009. Describe how the WDB plans to meet this goal.
3. The Recovery Act allows some flexibility in program design for the summer months. Describe the WDB's plans for:
  - a. Program elements offered during the summer
  - b. Types of assessments utilized
  - c. Development of the Individual Service Strategy
  - d. Addressing academic needs
  - e. Providing follow-up services
4. Describe plans to connect summer youth participants to other services or training opportunities available in the area, or to the year-round youth program.

5. Opportunities for skilled workers in the fields of solar, geothermal, wind power design, and the use of environmentally-friendly building materials will mean increased job opportunities for young people who have had exposure to work experiences that equip them with the appropriate “green” knowledge. Describe plans to incorporate “green” work experiences in the youth program.
6. Describe plans to measure and document Work Readiness outcomes for youth funded through WIA youth Recovery Act funds.
7. Describe and attach the WDB’s policy for providing stipends to youth.

#### D. Training

1. Identify the planned number of worksites, including the number of public sector, private sector, and non-profit.
2. Describe any special projects or group activities.
3. Describe plans to expand work experience opportunities to registered apprenticeships offered by employers.
4. Describe the WDB’s strategy for ensuring that work experience agreements do not unfavorably impact current employees and do not impair existing contracts for services or collective bargaining agreements.
5. Describe the WDB’s strategy for ensuring the work experience of the participants does not replace the work of employees who have experienced layoffs (see 20 CFR 667.270 for non-displacement requirements).
6. Youth summer employment should be a work experience intended to increase work readiness skills of participants and not impact the profit margin of a for-profit company. Describe the selection criteria to ensure that one employer is not favored at the expense of another employer.
7. Describe the WDB’s plans to deliver an orientation, including safety training; wage and hours provisions; and child labor laws to youth participants and worksite supervisors.
8. Has the WDB secured worker’s compensation or other similar coverage for work-related injury or illness of trainees?

#### E. Selection of Service Providers

1. Describe the procurement process utilized to select the summer youth service providers.
2. Provide a list of service providers who will be providing youth services using WIA Recovery Act funds. The contact information provided in this chart will be posted on the DWD Recovery Act website (use Form C).

#### **IV. Year-Round Youth Program**

1. Describe program components of the WDA's year-round youth services funded with Recovery Act funds.
2. A minimum of twenty-five percent of the WDB's Recovery Act youth allocation must be spent on training with a focus on ABE, GED/HSED or work readiness certification. Describe how the WDB intends to meet this goal.
3. Describe continued services that will be provided to support older/out-of-school youth during non-summer months.

#### **V. Accountability**

##### **A. Expenditures and Enrollments**

1. Describe how the WDB will ensure that Recovery Act funds will supplement and not supplant existing resources which are spent on workforce programs and services.
2. Complete the following forms:
  - a. Quarterly Enrollment and Budget Summary - Adult and Dislocated Worker Programs (Form D)
  - b. Quarterly Enrollment and Budget Summary – Youth Program (Form E)
  - c. Budget Back-up - Adult and Dislocated Worker Programs (Form F)
  - d. Budget Back-up – Youth Program (Form G)
  - e. Staffing Plan – Adult, Dislocated Worker and Youth Programs (Form H)

##### **B. Monitoring**

1. Describe plans for onsite monitoring of all summer worksites/projects, including wage and hour provisions, child labor laws, worksite supervision and safety.
2. Submit the WDB's timetable for conducting summer youth program monitoring.
3. Oversight and monitoring should determine whether or not there is compliance with programmatic, accountability, and transparency provisions of the Recovery Act and Training and Employment Guidance Letter 14-08, as well as the regular provisions of WIA. Describe the process in place for monitoring and oversight of the additional funds provided under the Recovery Act. At a minimum, the response should address the following:
  - a. Monitoring expenditures and enrollments
  - b. Monitoring of service providers
  - c. Monitoring worksites and special projects.

## VI. Assurances and Signatures

1. The WDB, including the chief elected official of the area and providers receiving funds under Title I of the Workforce Investment Act, will comply with the Fiscal Controls established in Section 184 of WIA.
2. The WDB and chief elected official assure that they will comply with the nondiscrimination provisions of WIA section 188, including an assurance that a Methods of Administration has been developed and implemented.
3. The WDB assures that it will collect and maintain data necessary to show compliance with the nondiscrimination provisions of WIA section 188.
4. The WDB assures that veterans will be provided priority access to employment and training activities authorized in section 134 of WIA.
5. The WDB assures that all WIA participants will be exposed to a full range of career choices including orienting and exposing them to training and jobs with family-supporting wages.
6. The WDB assures that financial literacy training/information is made available for all participants.
7. The WDB assures that no funds received under WIA will be used to assist, promote, or deter union organizing.
8. The WDB assures that it will comply with section 504 of the Rehabilitation Act of 1973 and the American's with Disabilities Act of 1990.
9. The WDB assures that it developed this plan in consultation with the business community, labor organizations, and required partners.
10. The WDB assures that funds will be spent in accordance with WIA legislation, regulations, written DOL Guidance, Division of Employment and Training (DET) Guidance and all other applicable federal and state laws.
11. The WDB assures that no WIA funds will be spent on the development or operation of any data management systems that duplicate systems provided by the State of Wisconsin, especially ASSET, WorkNet, or Job Center of Wisconsin.
12. The WDB assures that it will comply with state program priorities and directives set out in the state plan and any subsequent modifications.
13. The WDB assures that 70% of the Recovery Act youth allocation will be spent by October 1, 2009.
14. The WDB assures that 25% of the Recovery Act youth allocation will be spent on ABE, GED, HSED or work readiness training for 18 to 24 year old youth.
15. The WDB assures that all individuals served with Recovery Act funds will be tracked in ASSET.
16. The WDB assures that all employment opportunities generated by Recovery Act activities will be made available through the Job Center of Wisconsin website.
17. The WDB assures that Recovery Act funds will not be used for any casino or other gambling establishment, aquarium, zoo, golf course, or swimming pool.
18. The WDB assures that all costs will be tracked and reported in accordance with the line codes established in the CORE reporting system for each contract.
19. The WDB assures that Recovery Act funds will be treated as a separate fund source to enable reporting of contract costs, subcontract costs and performance separate from other programs.

NOTE: Signatures are also required on the Certifications in the Forms C and D.

This plan has been developed for the \_\_\_\_\_ WDA in accordance with the terms of the WIA.

**Approved for the Workforce Development Board**

**Workforce Development Board Chair**

Name (type or print): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Approved for the Counties of the Workforce Development Area**

**Chief Local Elected Official**

Name (type or print): \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Local Elected Officials (Optional):**

Name (type or print): \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (type or print): \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

etc., for the number of counties in the area.

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**Certification Regarding  
Debarment, Suspension, Ineligibility and Voluntary Exclusion  
Lower Tier Covered Transactions**

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This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, Participants' responsibilities. The regulations were published as Part VII of the May 26, 1988 Federal Register (pages 19160-19211).

**BEFORE COMPLETING CERTIFICATION, READ ATTACHED INSTRUCTIONS WHICH ARE  
AN INTEGRAL PART OF THE CERTIFICATION**

- (1) The prospective recipient of Federal assistance funds certifies, by submission of this proposal, that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective recipient of Federal assistance funds is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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Name and Title of Authorized Representative

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Signature

Date

**Instructions for Certification**

1. By signing and submitting this proposal, the prospective recipient of Federal assistance funds is providing the certification as set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective recipient of Federal assistance funds knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the Department of Labor (DOL) may pursue available remedies, including suspension and/or debarment.
3. The prospective recipient of Federal assistance funds shall provide immediate written notice to the person to whom this proposal is submitted if at any time the prospective recipient of Federal assistance funds learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
4. The terms “covered transaction,” “debarred,” “suspended,” “ineligible,” “lower tier covered transaction,” “participant,” “person,” “primary covered transaction,” “principal,” “proposal,” and “voluntarily excluded,” as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to whom this proposal is submitted for assistance in obtaining a copy of those regulations.
5. The prospective recipient of Federal assistance funds agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the DOL.
6. The prospective recipient of Federal assistance funds further agrees by submitting this proposal that it will include the clause titled “Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions,” without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may but is not required to check the List of Parties Excluded from Procurement or Nonprocurement Programs.
8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the DOL may pursue available remedies, including suspension and/or debarment.

**CERTIFICATION REGARDING LOBBYING**

**CERTIFICATION FOR CONTRACTS, GRANTS, LOANS AND COOPERATIVE AGREEMENTS**

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employe of an agency, a Member of Congress, an officer or employe of Congress, or an employe of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employe of any agency, a Member of Congress, an officer or employe of Congress, or an employe of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all\* subawards at all tiers (including subcontracts, subgrants and contracts under grants, loans, and cooperative agreements) and that all\* subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

	WIA Title I-B
Grantee/Contractor Organization	Program/Title

Name of Certifying Official	Signature	Date

\*Note: In these instances, "All," in the Final Rule is expected to be clarified to show that it applies to covered contract/grant transactions over \$100,000 (per OMB)

**American Recovery and Reinvestment Act (ARRA)  
Youth Service Providers**

<b>Youth Service Provider</b>	<b>Contact Information</b>	<b>Services Provided</b>	<b>Est. Number of Youth Served in Summer of 2009 (ARRA Only)</b>	<b>Est. Number of Youth Served in Year-Round Activities (ARRA)</b>

**ARRA Quarterly Enrollment and Budget Summary**

\_\_\_\_\_ **Adult** \_\_\_\_\_ **Dislocated Worker Program**

**WDA** \_\_\_\_\_

All figures are cumulative

	Admin	Program	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 5	Qtr 6	Qtr 7	Qtr 8	Qtr 9
			6/30/2009	9/30/2009	12/31/2009	3/31/2010	6/30/2010	9/30/2010	12/31/2010	3/31/2011	6/30/2011
<b>ARRA Funded Activities</b>											
Total Participants											
Receiving Intensive Services											
Enrolled in Training											
Occupational Classroom											
OJT											
Customized ( Employer Based)											
Receiving Supportive Services											
Receiving Needs Related Payments											
<b>ARRA Program Expenditures</b>											
Core and Intensive Services											
Training											
Supportive Services											
Needs Related Payments											
<b>ARRA Administrative Expenditures</b>											
<b>TOTAL ARRA Expenditures</b>											

ARRA Quarterly Enrollment and Budget Summary - Youth Program WDA \_\_\_\_\_

All figures are cumulative

Admin	Program	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 5	Qtr 6	Qtr 7	Qtr 8	Qtr 9
		6/30/2009	9/30/2009	12/31/2009	3/31/2010	6/30/2010	9/30/2010	12/31/2010	3/31/2011	6/30/2011
<b>ARRA Funded Activities</b>										
Total Participants										
Enrolled in Work Experience										
Receiving ABE/GED/Work Ready										
Receiving Supportive Services										
Receiving Stipends										
<b>ARRA Program Expenditures</b>										
Youth Wages & Stipends										
Training (ABE/GED/Work Ready)										
Supportive Services										
<b>ARRA Administrative Expenditures</b>										
<b>TOTAL ARRA Expenditures</b>										

**ARRA Back-up Budget**

\_\_\_\_\_ Adult

\_\_\_\_\_ Dislocated Worker

WDA

	Administration	Program	Total
<b>Staff Salaries</b>			
<b>Staff Fringe Benefits</b>			
<b>Staff Travel</b>			
<b>Communications</b>			
<b>Facilities (rent, utilities, maintenance)</b>			
<b>Office Supplies</b>			
<b>Testing and Instructional Materials</b>			
<b>Equipment</b>			
Use/Depreciation			
Purchase			
Lease			
<b>Training</b>			
Classroom (tuition, books, fees, etc.)			
OJT Reimbursements			
Customized Training			
Supportive Services			
Needs Related Payments			
Audit costs			
Contracted Services			
<b>Total</b>			

**ARRA Back-up Budget  
Youth**

**WDA**

	<b>Administration</b>	<b>Program</b>	<b>Total</b>
<b>Staff Salaries</b>			
<b>Staff Fringe Benefits</b>			
<b>Staff Travel</b>			
<b>Communications</b>			
<b>Facilities (rent, utilities, maintenance)</b>			
<b>Office Supplies</b>			
<b>Testing and Instructional Materials</b>			
<b>Equipment</b>			
Use/Depreciation			
Purchase			
Lease			
<b>Training and Services</b>			
Wages & Stipends			
ABE/GED/Work Ready			
Supportive Services			
Audit costs			
Contracted Services			
<b>Total</b>			

**ARRA  
Staffing Plan**

\_\_\_\_\_ Adult    \_\_\_\_\_ Dislocated Worker    \_\_\_\_\_ Youth    WDA \_\_\_\_\_

<b>Administrative Staff Salary and Benefits</b>				
Position	Monthly Total	% Charged	# Months	Total
Administrative Staff Total	\$ -			\$ -
<b>Program Staff Salary and Benefits (include contracted staff)</b>				
Position	Monthly Total	% Charged	# Months	Total
Program Staff Total	\$ -			\$ -
<b>Staffing Total</b>				

## Attachment K

### Monitoring

Date: June 5, 2009

To: Workforce Development Board Directors  
Workforce Development Board Chairs  
Chief Local Elected Officials

From: Gary Denis, Director  
Bureau of Workforce Training

Subject: American Recovery and Reinvestment Act (ARRA) Program Year (PY) 2008  
Onsite Monitoring of Workforce Development Board (WDB) Programs

**This is to announce the onsite monitoring of PY2008 ARRA programs managed by the Workforce Development Boards (WDBs). Monitoring will consist of both desk review and onsite reviews to be conducted by the Department of Workforce Development/Division of Employment and Training (DWD/DET) Local Program Liaisons (LPL). Following are the timelines and summary of how monitoring will be conducted.**

#### ARRA Desk Review Survey

- June 2009: WDBs will receive a copy of the desk review survey to complete and return to their LPL by June 22, 2009. This survey will ask for a list of summer youth worksites and worksite agreement templates prior to the onsite monitoring visit. From the worksite list, samples will be chosen of various locations to be visited for onsite monitoring.

#### ARRA Youth Program

- July-August 2009: LPLs will conduct onsite monitoring of the selected summer youth sites that will include an interview with WDB staff to ensure that the local area is providing services according to TEGL 14-08, DWD Administrator Memo 09-01, and their approved WDB ARRA Plan. In addition, there will be youth participant interviews, workplace supervisor interviews, and participant file reviews.
- LPLs will issue a monitoring report to the WDB within 30 days of the onsite review. Monitoring reports will cite items that need to be revised or corrected to ensure compliance. Any items needing immediate corrective action such as safety hazards or illegal working conditions will be addressed immediately. Other non-emergency items will require correction within a logical duration of time as determined by the LPL. LPLs will monitor to ensure the corrective action is implemented.

#### ARRA Adult and Dislocated Worker (DW) Programs Implementation Guide

- July-August 2009: LPLs will conduct onsite monitoring to determine how the local area has implemented its ARRA Adult and DW programs to date. This is intended to be a preliminary review only and a more comprehensive review will be done during annual subsequent monitoring as described on page 2 of this correspondence. This preliminary, abbreviated review will be completed during the same visit as the summer youth monitoring visits. Monitoring will consist of an interview with WDB staff to ensure that the local area is planning and implementing services according to TEGL 14-08, DWD Administrator Memo 09-02 issued April 16, 2009, and the approved local ARRA Plan.

### **ARRA Monitoring Guides**

Copies of the ARRA monitoring guides are attached. They include:

- ARRA Desk Review Survey – PY08
- ARRA Adult and Dislocated Worker Programs Implementation Guide – PY08
- ARRA Youth Monitoring Guide – PY08
- WIA and ARRA Youth File Review Guide – PY08

### **Subsequent Annual Monitoring**

Once ARRA-specific monitoring is completed, we will separately proceed with our routine, annual monitoring which will include WIA formula and ARRA programs. Monitoring both programs together will enable us to assess transparency and accountability between the programs. Following is the timeline and topics for this monitoring. As this time nears, specific information including the monitoring guides will be shared with you.

- Approximately October 2009 – February 2010: Onsite interviews and file reviews will be conducted with emphasis in the following areas:
  - WIA and ARRA Adult and Dislocated Worker Program;
  - WIA and ARRA Youth Programs;
  - Veterans questions including statistical analysis;
  - Selective Service process per WIA Policy Update 08-06 published December 5, 2008;
  - On-the-job training and customized training;
  - Supportive Services including needs-related payments;
  - Co-enrollments with other related programs;
  - Waiver outcomes;
  - Assurances found in the WIA and ARRA Plan; and
  - WIA and ARRA Financial Monitoring.

Thank you in advance for your assistance and cooperation in completing this important work. Please contact your Local Program Liaison if you have questions.

Attachments: (4)

**Program Year 2008**

## **American Recovery and Reinvestment Act (ARRA) Desk Review Survey**

Department of Workforce Development  
Division of Employment and Training (DET)  
Bureau of Workforce Training, Local Services Section  
201 E. Washington Avenue, P.O. Box 7972  
Madison, WI 53707-7972

**The Desk Review Survey is a part of the Workforce Development Area (WDA) program review process. Its purpose is to assist you and DET staff to prepare for the upcoming on-site visit. Prior to the onsite review, a desk review is conducted. A variety of information is used in doing so, including your response to this survey.**

Please submit the completed Desk Review Survey items below to your DET Local Program Liaison (LPL) by Monday, June 22, 2009. Failure to return the items by the due date may result in a monitoring finding and/or ineligibility for additional grant funding opportunities. The Desk Review Survey and all attachments **must be submitted electronically. Hard copies are not required.**

Thank you for your assistance in completing this portion of the Program Year (PY) 08 review process. Please contact your LPL if you have any questions or concerns.

Theresa Loerke (608) 264-8179 [theresa.loerke@dwd.wisconsin.gov](mailto:theresa.loerke@dwd.wisconsin.gov)  
Karen Pfeil (608) 266-9663 [karen.pfeil@dwd.wisconsin.gov](mailto:karen.pfeil@dwd.wisconsin.gov)

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### **ARRA Youth Program**

Please submit the following which relate to your ARRA Youth Program:

- e. List of worksites (separate by public and private sector). List must include the name of the worksite, the worksite address, youth job titles, duration of employment, and number of youth employed.
- f. Worksite agreement template(s).

**IDENTIFYING DATA**

WDA \_\_\_\_\_ Date of Review \_\_\_\_\_

DET Staff Reviewer(s) \_\_\_\_\_

WDB Staff Interviewed \_\_\_\_\_

**PURPOSE**

The purpose of the American Recovery and Reinvestment Act (ARRA) Program Year (PY) 2008 review is to determine whether the program is being implemented in accordance with the provisions of TEGL 14-08, DWD Administrator’s Memo Series 09-02, the WIA State ARRA Supplemental Plan, and the WIA Local ARRA Supplemental Plan. Additionally, the review should identify best practices and technical assistance needs.

**DESK REVIEW** of WIA activities should be used to review existing information prior to conducting the onsite review with the objective of identifying particular issues and concerns that may need attention or discussion during the onsite review.

**Sources of Information for the desk review:**

- 10. TEGL 14-08 published March 18, 2009;
- 11. Administrator’s Memo Series 09-02 issued April 16, 2009;
- 12. WIA State ARRA Supplemental Plan related to adult and dislocated worker program;
- 13. WIA Local ARRA Supplemental Plan related to adult and dislocated worker program;
- 14. ARRA adult and dislocated worker participant data in ASSET;
- 15. ASSET and Webi reports; and
- 16. CORE financial reports.

11. Desk Review

<b>Items Reviewed</b>	<b>Comments/Observations</b>
Local ARRA Plan	
Adult Planned Vs. Actual Enrollments	
Dislocated Worker Planned Vs. Actual Enrollments	
Adult Planned Vs. Actual Program Expenditures	
Dislocated Worker Planned Vs. Actual Program Expenditures	
Percentage of ARRA Adult and Dislocated Worker Allocation Spent on Training (70% is the goal)	

## INTERVIEW QUESTIONS FOR WDB STAFF

- 1) Describe veterans services.
  - What process are you using to identify Veterans and eligible spouses when they come into the Job Center? (Requirement exists that they are identified at the point of entry and given an opportunity to take full advantage of priority of service)
  - What process or procedures do you have in place at the Job Center to inform Veterans and eligible spouses that they have priority of service? (You can verbally inform them, have something that refers to the priority of service placed in the waiting area, or provide a document to them that clearly states that they have priority of service).
  - Do you have any questions about veterans services (veteran and eligible spouse definition, proof of veteran status, priority of service, referrals, etc.)
- 2) Describe and assess how the process of referring Re-employment Services (RES) participants to WIA Title 1 and ARRA is being done. (*ARRA Local Plan II.A*)
- 3) Describe and assess how recipients of public assistance and other low-income individuals are receiving priority of service. (*ARRA Local Plan II.B*)
- 4) If applicable, describe and assess how the needs related payment process is operating. (*ARRA Local Plan II.C*)
- 5) Describe and assess how the WDB is ensuring that 70% of their ARRA adult and dislocated worker allocation is being spent on training. (*ARRA Local Plan II.D*)

## OBSERVATIONS AND CONCLUSIONS

Use this form to summarize major findings, issues, and concerns. To the degree possible, note recommendations and follow-up steps to be taken, along with how this will be accomplished, in particular, as well as any technical assistance needs identified.

Based on the interview, are there any concerns about the ARRA's adult and dislocated worker program?

Were any problems/issues/technical assistance needs identified?

Are there any best practices that could be shared with other WDAs?

What are the recommended actions?

Is follow-up required? If so, when?

### Summary of Review

WDA \_\_\_\_\_ Date of Review \_\_\_\_\_

DET Staff Reviewer(s) \_\_\_\_\_

WDB Staff Interviewed \_\_\_\_\_

**Summary and Observations.** Summarize the strengths (including best practices) and weaknesses identified.

**Follow Up Needed.**

**Technical Assistance Needs.** Identify technical assistance needs of the WDB or program provider.

**IDENTIFYING DATA**

WDA \_\_\_\_\_ Date of Review \_\_\_\_\_

DET Staff Reviewer(s) \_\_\_\_\_

WDB Staff Interviewed \_\_\_\_\_

**PURPOSE**

The purpose of the American Recovery and Reinvestment Act (ARRA) Program Year (PY) 2008 review is to determine whether the program is being implemented in accordance with the provisions of TEGL 14-08, DWD Administrator’s Memo Series 09-01, the WIA State ARRA Supplemental Plan, and the WIA Local ARRA Supplemental Plan. Additionally, the review should identify best practices and technical assistance needs.

**DESK REVIEW** of WIA activities should be used to review existing information prior to conducting the onsite review with the objective of identifying particular issues and concerns that may need attention or discussion during the onsite review.

**Sources of information for the desk review:**

- 17. TEGL 14-08 published March 18, 2009;
- 18. Administrator’s Memo Series 09-01 issued April 16, 2009;
- 19. WIA State ARRA Supplemental Plan related to youth program;
- 20. WIA Local ARRA Supplemental Plan related to youth program;
- 21. WDA’s list of worksites;
- 22. WDA’s worksite agreement template;
- 23. ARRA youth participant data in ASSET;
- 24. ASSET and Webi reports;
- 25. CORE financial reports; and
- 26. Child Labor Law literature from Wisconsin Equal Rights Division (take extras for possible distribution during onsite reviews)

12. Desk Review

<b>Items Reviewed</b>	<b>Comments/Observations</b>
Local ARRA Plan	
List of Worksites	
Worksite Agreement Templates	
Planned Vs. Actual Enrollments	
Planned Vs. Actual Program Expenditures	

## INTERVIEW QUESTIONS FOR WDB STAFF AND YOUTH SERVICE PROVIDERS

- 1) Describe the referral processes in place, including what agency(s) they are working with, agreements in place, procedures, forms, and any best practices or problems that have resulted. (*ARRA Local Plan III.B.1 and B.2*)
  - a) Department of Corrections (Adult and Juvenile Corrections)
  - b) Department of Children and Families (Foster Care and W-2)
  - c) DWD Veterans Staff
  - d) Youth Apprenticeship
  - e) Division of Vocational Rehabilitation
  - f) Adult Apprenticeship
  - g) Other
- 2) Provide an assessment of special services to assist the 21-24 year old youth. Are there plans to revise any of this approach? Please share best practices. (*ARRA Local Plan III.B.3*)
- 3) How is the local area determining which youth will be in summer work experience only versus those who will stay on in WIA year round youth programs? (*ARRA Local Plan III.C.4, Section IV*)
- 4) How is the local area determining which youth in summer work experience only will be transferred into WIA Adult Services? Describe the transition process. (*ARRA Local Plan IV.3*)
- 5) How were worksites developed? Was the WDB able to establish a sufficient number of worksites? What criteria were used for selecting worksites? Was there any additional criteria used in selecting private sector employers? (*ARRA Local Plan IV.D.1, D.2, D.3, D.4, D.5, D.6, and D.7*)
- 6) Is the WDB on track to spend at least 70% of their youth funds by October 1, 2009? If not, discuss reasons and solutions. (*ARRA Local Plan III.C.2*)
- 7) Review the procurement process used to select summer youth program providers. Review the Request For Proposals (RFPs) used. Discuss if the process is within the procurement regulations of Section 123 of WIA? (*ARRA Local Plan III.E.1 and E.2*)
- 8) Describe the orientation process provided for worksite supervisors. Provide a copy of the agenda and handbook. (*III.D.7*)
- 9) Describe the orientation process provided to youth prior to their work experience. Provide a copy of the agenda and handbook.
- 10) Review monitoring processes in place to ensure all summer sites are monitored for the following items. Describe how monitors were trained in these items. Collect and review monitoring tools. Collect and review completed monitoring reports to date. (*ARRA Local Plan V.B*)
  - That wage and hour provisions are being complied with;
  - That child labor laws are being met;
  - That youth are providing acceptable performance;
  - That workplace supervision is adequate;
  - That youth are working in safe conditions per child labor laws.
  - That the terms of the worksite agreement are being carried out.
- 11) Describe which summer jobs were posted on Job Center of Wisconsin (JCS) as required per the Governor's Executive Order.
- 12) How is the WDA ensuring it spends at least 25% of its ARRA youth funds on training with a focus on ABE, GED, HSED, or work readiness certification training?
- 13) Is the local area using the career pathway model in its ARRA summer youth model? If so, describe how this is being done.

- 14) How is the local area promoting Work Opportunity Tax Credit (WOTC) as an incentive for employers to hire older and out-of-school youth? How many employers have expressed interest in this?
- 15) How is the local area ensuring that materials, documents, and reports contain the ARRA symbol and give credit to ARRA and DWD for funding? Collect samples of these materials.
- 16) What kind of activities determine if the youth has met the work readiness goal set? What documentation will we see in the participant file to support this? (III.C.6)
- 17) Describe the payroll/timekeeping process in place.
- 18) How are you ensuring that veterans are being served by the program? (III.A.2)
  - How many veterans or their spouses have been referred to each WDB location by the DVOPs/LVERs veteran staff? (requirement placed on DVOPs/LVERs by Vets Program to have them refer eligible vets to the WDB youth coordinators)
  - How many veterans or their spouses have been referred to each WDB location for services under this funding?
  - Of those veterans or spouses referred, how many have you been able to place in some type of employment?
  - Do you have any questions about veterans services (veteran and eligible spouse definition, proof of veteran status, priority of service, referrals, etc.)?
- 19) Describe best practices:
  - Name of project
  - Contact Person
  - Description of Project
- 20) Please provide media releases, advertising, and other promotions done to promote the WDA's summer youth program.

## SITE SUPERVISOR INTERVIEW

Worksite Name: \_\_\_\_\_

Crew Leader: \_\_\_\_\_ Alternate Supervisor: \_\_\_\_\_

Location of Worksite: \_\_\_\_\_ Date of Visit: \_\_\_\_\_

- 1) How long have you been a worksite supervisor for job training programs?
- 2) Describe services provided at site and project goals/expected outcomes.
- 3) Did you attend an orientation session? Describe what was included in the orientation session. Were you informed of child labor and safety laws?
- 4) How do you communicate with the youth program staff (e.g., in person, by telephone, computer)? Have they made any onsite visits to monitor, check progress, etc.?
- 5) How often do you submit timesheets and participant evaluations? What is the process (who enters the hours, how are they entered, who checks for accuracy)?
- 6) What are the job duties of the youth participant? Are these duties documented in writing? If so, please describe.
- 7) If this is a private sector work experience, does the work done by the youth participant(s) match that of a regular employee in both content and quality?
- 8) What is your understanding of the youth participant's assignment to this worksite? Do you think this purpose can be achieved? Why or why not?
- 9) What is the probability of regular employment with your business for the youth participant?
- 10) How does the business benefit from participating as a worksite?
- 11) Is there sufficient work to be done? \_\_\_\_ Yes \_\_\_\_ No
- 12) Are there adequate supplies to work with? \_\_\_\_ Yes \_\_\_\_ No
- 13) In case of inclement weather for outdoor worksites, is there an alternate site for participants to go? \_\_\_\_ Yes \_\_\_\_ No
- 14) Are there any indications of Child Labor Law violations? If so, please explain.
- 15) Are work conditions safe and appropriate for a youth program? \_\_\_\_ Yes \_\_\_\_ No
- 16) Are there sanitary facilities available? \_\_\_\_ Yes \_\_\_\_ No
- 17) Is there a first aid kit on-site that is easily accessible? \_\_\_\_ Yes \_\_\_\_ No
- 18) Have there been any accidents? If so, describe. \_\_\_\_ Yes \_\_\_\_ No
- 19) If yes, have any accident reports been filed? \_\_\_\_ Yes \_\_\_\_ No
- 20) Do you have any questions or suggestions regarding the summer youth program?

## **PARTICIPANT INTERVIEW**

Participant's Name: \_\_\_\_\_ Participant's Age: \_\_\_\_\_

Name of Worksite: \_\_\_\_\_ Date Visited: \_\_\_\_\_

Location of Worksite: \_\_\_\_\_

- 1) Is this the first year you have participated in the Employment Program?  
 Yes  No
- 2) How did you get this job?
- 3) Who are your supervisors?
- 4) Is a supervisor available at all times?  Yes  No
- 5) Did you have an orientation to the program?  Yes  No  
If yes, describe.
- 6) What are your duties and assignments?
- 7) If this is a private sector job, does your work match that of a regular employee in both content and quality?
- 8) Do you receive help from others when you need it?  Yes  No
- 9) Do you have enough tools/supplies to work with?  Yes  No
- 10) Do you have enough work to keep busy?  Yes  No
- 11) Have you had an accident requiring medical attention at a clinic or hospital?  
 Yes  No If yes, when did it occur and what happened? Did you report the accident to your supervisor?
- 12) Where is the First Aid Kit?
- 13) Do you know what to do if you are unable to come to work?  Yes  No
- 14) What do you do if you have a complaint or grievance?
- 15) What do you like about the program?
- 16) What do you dislike about the program?
- 17) What are your suggestions to improve the program?
- 18) Do you participate in any math or reading programs as part of this program?  
 Yes  No If yes, do you find them useful?  Yes  No
- 19) What skills are you learning on the job?
- 20) Does your supervisor/instructor talk to you about your progress?  Yes  No
- 21) What skills do you think would be more useful in the future?
- 22) What are your plans for the future in terms of school and/or work?

## **OBSERVATIONS AND CONCLUSIONS**

Use this form to summarize major findings, issues, and concerns. To the degree possible, note recommendations and follow-up steps to be taken, along with how this will be accomplished, in particular, as well as any technical assistance needs identified.

- 1) Based on the interview, are there any concerns about the youth program?
- 2) Were any problems/issues/technical assistance needs identified?
- 3) Are there any best practices that could be shared with other WDAs?
- 4) What are the recommended actions?
- 5) Is follow-up required? If so, when?

**Summary of Review**

WDA \_\_\_\_\_ Date of Review \_\_\_\_\_

DET Staff Reviewer(s) \_\_\_\_\_

WDB Staff Interviewed \_\_\_\_\_

**Summary and Observations.** Summarize the strengths (including best practices) and weaknesses identified.

**Immediate Follow Up Needed.**

**Follow Up Needed.**

**Technical Assistance Needs.** Identify technical assistance needs of the WDB or program provider.



OBJECTIVE ASSESSMENT & INDIVIDUAL SERVICE STRATEGY	COMMENTS:
<input type="checkbox"/> Yes <input type="checkbox"/> No   Objective Assessment (basic skills, occupational skills, prior work experience, interests/aptitudes, support service needs, NTO, etc.)	
<input type="checkbox"/> Yes <input type="checkbox"/> No   Individual Service Strategy (based on assessment, measurable skill attainment goals, jointly developed)	
<input type="checkbox"/> Yes <input type="checkbox"/> No   ISS includes non-WIA services; is reviewed & updated	

<p><b>DESIGN FRAMEWORK &amp; SERVICES (FOR ARRA SUMMER WORK EXPERIENCE ONLY)</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Design Framework (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Paid Work Experience (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Supportive Services (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Work Readiness (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Stipends for Youth In Training (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Other services (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Services ended on September 30, 2009 or sooner</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Services concur with assessment and ISS</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Work Experience Agreement in file</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Payroll timesheets are in the file.</p>	<p>COMMENTS:</p>
<p><b>DESIGN FRAMEWORK &amp; SERVICES (FOR WIA AND YEAR ROUND ARRA):</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Design Framework (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No First Youth Service (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Supportive Services (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Other services (dates)</p> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Services concur with assessment and ISS</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Gap in service (documented)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Work Experience Agreement</p>	<p>COMMENTS:</p>
<p><b>WORK READINESS GOAL: (FOR ARRA SUMMER WORK EXPERIENCE ONLY)</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No First goal set on date of first service</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Measurable goal related to local policy</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No File contains documentation to support the goal was met</p>	<p>COMMENTS:</p>
<p><b>TRANSITIONING OF ARRA YOUTH: (FOR ARRA SUMMER WORK EXPERIENCE ONLY)</b></p> <p><b>If the youth turned 24, check what happened.</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No ARRA services ended, not put into any other WIA Program.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No ARRA services ended, youth became a WIA participant.</p>	<p>COMMENTS:</p>
<p><b>EXIT INFORMATION:</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Exit documented in case notes</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Follow-up services provided</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Supplemental employment data</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Exclusionary exit</p>	<p>COMMENTS:</p>
<p><b>WOULD INFORMATION REPORTED IN ASSET PASS UNDER DATA VALIDATION AND IS IT ACCURATELY REPORTED FOR PERFORMANCE? (FOR WIA Title 1 only)</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (All Youth) Employment Status at Participation</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (All Youth) Enrolled in Education Status</p>	

<input type="checkbox"/> Yes <input type="checkbox"/> No Older Youth Only: Credential Type	
<input type="checkbox"/> Yes <input type="checkbox"/> No Younger Youth Only: Type of Skill Attainment Goal	
<input type="checkbox"/> Yes <input type="checkbox"/> No Younger Youth Only: Date that Skill Attainment Goal Set	
<input type="checkbox"/> Yes <input type="checkbox"/> No Younger Youth Only: Goal Attainment Status	
<input type="checkbox"/> Yes <input type="checkbox"/> No Younger Youth Only: Date that Skill Attainment Goal Attained	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Attainment of diploma, GED, or Certificate	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Date that Degree or Certificate Attained	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: School Status at Exit.	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Youth Placement First Quarter After Exit	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Youth Retention Third Quarter After Exit	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Assessment Done Via Approved Test for ABE	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Assessment Done Via Approved Test for ESL	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Functional Area that Youth Tested In	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Date that Pre-Test Administered	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Score of Pre-Test	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Pre-Test Education Level	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Date that Post-Test Administered	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Score of Post-Test	
<input type="checkbox"/> Yes <input type="checkbox"/> No All Youth: Post-Test Education Level	

## Attachment L

### Wisconsin WIA Waiver Plan - June 2009 Attachment to the ARRA Addendum WIA Wisconsin State Plan Modification

#### Background

Governor Doyle submitted a State Workforce Investment Act (WIA) Waiver Plan on August 29, 2008 to the U.S. Department of Labor. The waiver requests that were approved for program year 2008 by DOL on November 28, 2008 include the following WIA sections:

Waiver to permit the State to replace the performance measures with only common performance measures reporting, WIA Section 136 (b).

Waiver to transfer funds up to 100 percent between the Adult and Dislocated Workers local formula funds, WIA Section 133(b)(4).

Waiver to use up to 10 percent of local formula funds to provide statewide employment and training activities, including incumbent worker training, WIA Section 134.

Waiver on the competitive procurement process for youth providers, WIA Section 123.

A previously approved waiver, the latest DOL extension being July 25, 2007 for program year 2008 is:

Waiver to extend the period of initial eligibility of training providers which postpones the implementation of the subsequent eligibility provision 20 CFR § 63.530.

#### Action Requested

**I. The Governor is requesting that the above DOL granted waivers be extended for the full program year 2009- 2010 for WIA formula Funds and American Recovery and Reinvestment Act funds** (with the exception that the waiver of up to 100 percent transfer of funds between the Adult and Dislocated Worker program funds is not applicable to ARRA funds.) As required in DOL's Training and Employment Guidance Letter 14-08, these waiver requests are included in this waiver plan (with the exceptions that the implementation of common measures, and the initial eligibility extension are exempt from the required submission of the full waiver plan.)

**II. The Governor is requesting DOL's approval of three new waiver requests for the full program year 2009 - 2010 for WIA formula funds and ARRA funds**, and are included in this waiver plan:

Waiver to increase the employer reimbursement for on-the-job training for small and medium-sized businesses, WIA section 101(31)(B).

Waiver on the 50 percent employer match for customized training, WIA section 101(8).

Waiver on the youth performance measures for out-of-school youth ages 18-24 served with ARRA funds beyond the summer months who participate in work experience only, WIA section 136 (b) (2) (A).

**Waiver title/purposes: On-the Job Training Employer Reimbursement and Customized Training Employer Match**

Wisconsin is requesting a waiver to increase the employer reimbursement for on-the-job training for small and medium-sized businesses and to waive the employer requirement to pay for not less than fifty percent of the cost of the training as required in customized training.

**Identify the statutory/regulatory requirements that are requested to be waived:**

WIA section 101 (31) (B) and WIA section 101 (8)

**Describe the actions that the State or local area, as appropriate, have undertaken to remove State for local statutory or regulatory barriers:**

The Wisconsin ARRA WIA State Plan Addendum identifies customized training and on-the-job training (OJT) as a focused strategy to increase training options. In addition to providing a fuller array of training choices for participants, this waiver will expand the flexibility of WDBs to better address the needs of under-employed and unemployed persons as well as provide skills upgrade needs of employed workers.

Currently, WDBs have very small numbers of WIA Title I participants in OJT with seven of the 11 WDBs providing OJTs ranging from one participant to thirty-two within their WDA in calendar year 2008. For customized training, the number of services is even lower. There were six WDBs with a total of 15 participants in the same calendar year. This is primarily because WDBs have relied predominantly on the WIA Training Account system to serve participants.

The Milwaukee WIB has requested both of these waivers, and DET anticipates more WDB requests through the summer. In order to give the WDBs full flexibility for their waiver requests to the state, these requests do not have any constraints except that the OJT waiver would only be applicable to small and medium sized businesses. Based on Wisconsin covered employment by industry by size, this would entail 128,805 business "units" that have one- 40 employees making up a total of 1,053,090 workers in small businesses. For the medium sized businesses of 50- 99 employees, there are 386,325 workers in 5,710 units. The state wants to allow the WDBs the potential to tailor needed services to optimize training for participants and meet employer demand for skilled workers.

Given the economic circumstances, the state is actively creating ways to allow WDBs to provide a broader range of training to address the larger participant level and also better meet the needs of individuals for successful training leading to gainful employment. Wisconsin has a high labor force participation rate. Most of the readily employable workers are already in the workforce. As a consequence, one of the most important workforce development issues identified in

Wisconsin is attracting and retaining more non-traditional labor in the workforce. This includes minority workers, people with disabilities, persons with problem civil and job histories, immigrants and older workers. Often this means addressing several barriers to training and employment such as transportation, childcare, education and training in both technical and soft skills. In addition, many of the people experiencing job losses are now needing to completely change their career path or require entirely new skills to meet advanced industry needs.

These two training methods are typically more attractive to people who have been disconnected from educational systems, those persons who have more unique learning needs with one-on-one assistance, and people who, (particularly formerly employed workers and persons who dropped out of high school, or never attended school such as immigrants), are more comfortable in work settings than academic classrooms. The targeted populations identified in WIA may be better served in these more stimulating, smaller, contextual training environments. In addition, the more hands-on training will improve soft skills.

These two waiver issues would directly assist in the implementation of the Governor's *Next Steps* related to "worker training" and well-serve as implementation features of other Gubernatorial workforce initiatives. Second, the CWI made several recommendations to improve the participation of private sector employers for training, job placement and retention, including:

"Providing incentives to employers engage with on-site training and hiring of job center seekers via multiple strategies, including but not limited to:

1. Creating employer financial incentives to provide job seekers with on-site training for job readiness and "employability" skills prior to an employee hire, and/or targeting funds to workforce intermediaries for cross-program job readiness and "employability skills" training.
2. Requesting a waiver from DOL to eliminate the 50% employer contribution for WIA on-the-job training and customized training."

*There are no State or local regulatory barriers to implement this waiver. If the waiver request is granted, it would not preclude the state or local areas to develop and implement additional measures to assess performance.*

***Describe the goals of the waiver and the expected programmatic outcomes if the request is granted:***

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The expectations for successful outcomes include

- Increased training participation of disconnected youth and adults and persons who need contextual training;
- Improve the talent match of participants with local employer needs; and
- Relieve the pressure on the technical college and two-year university system in order to provide optimal training with proper instructor-student ratios.

Long-term goals:

- Infuse career pathways and apprenticeship to further broaden training options.

***Describe the individuals impacted by the waiver:***

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- Out-of-school youth who need real world of work experiences with a link to the occupational skills and academic requirements;

- Older Dislocated Workers who have been in the world of work and are not desiring to "go back to school";
- Other participants also not comfortable in the traditional academic setting;
- People with low skills who may not be able to qualify for higher wage training.

***Describe the process used to monitor the progress in implementing such a waiver, the process used to provide notice to any Local Board affected by the waiver, Local Board's opportunity to comment on the request, and meaningful public comment by business, organized labor, public officials, community-based organizations and other stakeholders:***

DET will be issuing a new state policy on OJT and customized training in anticipation of these waiver approvals. WDBs will submit their waiver requests unique to their areas either as a separate plan or through the ARRA Addendum Local Plan process. DET will review those requests based on the state waiver policy that will be updated should this waiver be approved. WDBs will record the participants in the state's reporting system, ASSET, that separates the WIA and ARRA funds. These training strategies will be included in the Local Program Liaison's annual monitoring.

**Waiver title/purpose: Youth Performance Measures for Out-of-School Youth**

Wisconsin is requesting a waiver on the youth performance measures for out-of-school youth ages 18 to 24 served with ARRA funds beyond the summer months who participate in work experience only. This waiver would use the Work Readiness Indicator as the only indicator of performance for youth ages 18 – 24 served with ARRA funds who participate in a paid work experience only during the time period October 1, 2009 to March 31, 2010.

**Identify the statutory/regulatory requirements that are requested to be waived:**

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WIA section 136(b) (2) (A)

**Describe the actions that the State or local area, as appropriate, have undertaken to remove State for local statutory or regulatory barriers:**

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There are no state or local barriers to implementing the requested waiver.

***Describe the goals of the waiver and the expected programmatic outcomes if the request is granted:***

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The waiver is intended to facilitate implementation of WIA Youth Services under ARRA and support the intent of Congress to serve 18 – 24 year olds through a paid work experience in a time of difficult economic conditions. The waiver would also increase integration of services to customers, increase accountability at the state, local and service provider levels, provide greater flexibility to local boards in designing and implementing services, and improve services to youth and increase participation of out-of-school youth.

Extending the program design flexibility articulated in section 16A of TEGL 14-08 from the summer youth component to those older, out-of-school youth beyond September 30 would allow local service providers to devote more time and resources to the specific needs of these customers. Many local service providers have established local partnerships to service 22 – 24 year olds, and several boards are considering having these youth continuing in age-appropriate projects beyond September 30. By securing this waiver, local staff would be better positioned to work with youth to determine which program would best meet their needs.

During the time this waiver is in effect, youth service providers will be actively working to connect these youth to further education and training opportunities through the WIA Youth, WIA Adult and/or other programs as appropriate.

***Describe the individuals impacted by the waiver:***

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Approval of this waiver would give youth service providers greater flexibility in determining appropriate services for the older youth population, ages 18 – 24, served with ARRA funds. This increased flexibility will maximize the number of older youth serviced with these funds.

***Continued Service Plans for Participants:***

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For older and out-of-school youth who are not returning to school following the summer months, WDBs should consider work experiences and other appropriate activities beyond the summer months, including training opportunities and reconnecting to academic opportunities through multiple education pathways. Use of the career pathway model as defined in DWD's RISE initiative will help ensure this. The career pathway is a new way of organizing a postsecondary program as a sequence of modules that leads learners in steps toward a degree or technical diploma. Each step increases skills and improves the learner's career and earning opportunities. Industry sectors that are appropriate for pathway development are those that need skilled workers and contribute to the economic growth of the region. Bridge instructional programming helps adults with basic skills or English Language Learning (ELL) needs take the first step onto career pathway learning and work. Bridge programs explicitly link Adult Basic Education (ABE) and ELL instruction with preparation for postsecondary education and occupational skill attainment. To support low-income workers in career pathway learning, employers, workforce development agencies, educational institutions, and other community organizations actively collaborate to provide training resources and wrap-around support services to the learner as well as reinforce the value of continuing along the pathway.

***Describe the process used to monitor the progress in implementing such a waiver, the process used to provide notice to any Local Board affected by the waiver, Local Board's opportunity to comment on the request, and meaningful public comment by business, organized labor, public officials, community-based organizations and other stakeholders:***

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DET will issue a policy on the state-wide implementation of this waiver. It will be included in the Local Program Liaison's annual monitoring as well as ARRA-specific on-site reviews. Individuals served with ARRA and WIA funds will be tracked in ASSET.

**Waiver title/purpose: *Transfer of Funds between Adult and Dislocated Worker***

This waiver request increases the current 30% cap to an unlimited ability for WDBs to transfer funds between the WIA Adult and Dislocated Worker WIA Title Ib formula allocation funds. The waiver would give local boards the ability to respond to on-going changes and significantly increase the WDBs' flexibility over program delivery to best address the specific geographic, demographic and industry needs that change from community to community.

The State understands that this waiver is not applicable to ARRA funds.

**Identify the statutory/regulatory requirements that are requested to be waived:**

WIA §133(b)(4) and 20CFR §667.140 allows local boards with the approval of the Governor to transfer up to 20 percent of a program year allocation for adult employment and training activities as well as the dislocated worker activities between the two funding streams. The percentage was increased to 30 percent through a Congressional appropriation.

**Describe the actions that the State or local area, as appropriate, have undertaken to remove State or local statutory or regulatory barriers:**

This waiver will remove a current federal impediment to implement the Governor's Grow Wisconsin - The Next Steps: Accelerate - Innovate Reform Regulations that includes the outcome of eliminating barriers in order to maximize program effectiveness. The funding flexibility will avail WDBs, those with the most knowledge and expertise, to optimally use the funds available for improved service delivery. Dovetailing the Governor's Grow efforts, the CWI recommended to "streamline the funding process" and, "increase participation for job seekers and employers in a sustainable, comprehensive, training and employment system with streamlined administrative roles at the state and local levels."

WDBs have exercised their option under the law to transfer funds on a limited basis due to the current constraints. Given that Wisconsin has a few metropolitan pockets with a relatively high number of manufacturing industries undergoing major re-engineering and product development, and, conversely, large rural areas, WDB expenditures between the programs vary. The waiver will support better responsiveness to changes within each area.

DWD approved the South Central Wisconsin WDB April 6, 2009, requested implementation of this waiver, and anticipates further WDB requests through program year 2009 - 10.

There are no State or local regulatory barriers to implement this waiver.

**Describe the goals of the waiver and the expected programmatic outcomes if the request is granted:**

The general waiver goal is to eliminate a barrier in order to maximize program effectiveness. Additional goals that will be achieved include:

- Enhancing the flexibility of the WDBs to respond to workforce and economic conditions within their local areas to meet customer needs as well as improving targeted assistance efforts;
- Increasing collaboration between industry needs and worker training will improve with the expanded ability of WDBs to plan and respond accordingly; and,
- Performance outcomes will be improved through better targeting of funding.

***Describe the individuals impacted by the waiver:***

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All customers serviced by WIA Title I B and those co-enrolled in partner programs will be positively affected by this waiver through increased responsiveness. WDBs will benefit with additional fiscal flexibility and local control. Also, more efficient use of resources where funds are most needed will likely result in more customers served.

***Describe the process used to monitor the progress in implementing such a waiver, the process used to provide notice to any Local Board affected by the waiver, Local Board's opportunity to comment on the request, and meaningful public comment by business, organized labor, public officials, community-based organizations and other stakeholders:***

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DET issued a revised state policy providing guidance to the WDBs in implementing this waiver and revised the fiscal procedures. Each quarter, DET staff will review participant and performance data via ASSET, and generate special reports when deemed necessary. Monthly expenditure reports will also be a monitoring tool.

**Waiver title/purpose: *Use of Formula Funds for Incumbent Worker Training***

Wisconsin is requesting the use of up to 10% of the local youth, adult and dislocated worker formula funds to provide activities as allowable in the same manner as the statewide activity funds with an emphasis on incumbent worker training. The purpose is to expand the flexibility of the WDBs to address the skill upgrade needs of job seekers to meet the requisite skills for current employers and anticipated emerging industries.

**Identify the statutory/regulatory requirements that are requested to be waived:**

Allow the WDBs to use funds allocated to them under WIA Sections §127, §128, § 129, §132 and §133 in the same manner and fashion as statewide activity funds are now used under WIA Section §134(a)(3)(iv)(I), and 20 CFR §665.210(d)(1) "establishing and implementing innovative incumbent worker training programs" as well as exclusion of participants served under this waiver from the performance measures reporting WIA Section §136, TEGL 29-05 and all other related sections.

The waiver was approved by DOL with a broadened scope to permit the use of up to 10 percent of WDB formula funds for any statewide employment and training activities in the section.

DOL's conditions are:

- (a) track the funds by funding stream the same as is currently required;
- (b) track all participants served with these funds for performance; and
- (c) continue to conduct the required local employment and training activities in WIA section 134(d)

**Describe the actions that the State or local area, as appropriate, have undertaken to remove State or local statutory or regulatory barriers:**

DET has approved the South Central Wisconsin WDB's April 6, 2009 waiver request for program year 2008- 09. DET has received a request from the North Central WDB through the local plan process, with more requests anticipated through the summer.

Larger scale incumbent worker training and certain other activities, such as WIA investments in Manufacturing Skills Standards Certification, have been limited due to the current law. This waiver will allow DWD to help ensure that Wisconsin's workforce system is demand-driven and that WDBs are given maximum flexibility in tailoring service delivery and making strategic investments in workforce development activities to meet the needs of state and local economies and labor markets. This waiver is vital to help facilitate the implementation of the Governor's Sector Strategies Initiatives discussed in the ARRA Addendum State Plan.

Allowing WDBs the authority to use a limited portion (up to 10%) of their allocated funds for incumbent worker training programs permits them to develop a fuller continuum of training services that address the needs of the growing numbers of persons unemployed and the existing employed/underemployed workforce. Expanded local service delivery options could include establishing an employer loan program to assist in skills upgrading, increasing the

number of individuals trained for non-traditional employment, targeting areas in immediate response to economic conditions and developing exemplary program activities.

The Governor's Grow Wisconsin - The Next Steps includes priorities for "worker training," "advancing industry-led training initiatives" and "emerging industry skills partnerships," all of which support innovative incumbent worker training activities. The Governor emphasized that "By strengthening partnerships among schools, technical colleges, workforce development boards, labor unions, businesses and the state, we can deliver the training our workers need to improve their skills, knowledge and productivity and at the same time provide business with the qualified workers they need." Furthermore, this waiver supports the CWI's recommendation to "improve the participation of private sector employers for training, job placement and retention..."

There are no State or local regulatory barriers to implement this waiver.

***Describe the goals of the waiver and the expected programmatic outcomes if the request is granted:***

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A shift in service delivery strategies described in the ARRA Addendum State Plan, with an additional emphasis on targeted and innovative incumbent worker training to build the skills and employment options for workers, will focus on the following goals:

- Increased business sustainability by reducing the risk of laying off employees or business closure because workers have not kept current with new skills and technologies;
- Increased participation in career pathways and life-long learning models;
- Meet industry needs dovetailing the Sector Strategies Initiative; and
- Increased shift to on-the-job and customized training, and other more employer-directed short-term training programs that will ensure appropriate skill-set attainment to match the employer's job needs

***Describe the individuals impacted by the waiver:***

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WIA participants involved in any statewide activities. Assistance will be provided to local employers to upgrade the skills of the existing workers, enabling them to remain competitive. All customers of the workforce system will benefit from increased flexibility in service delivery.

***Describe the process used to monitor the progress in implementing such a waiver, the process used to provide notice to any Local Board affected by the waiver, Local Board's opportunity to comment on the request, and meaningful public comment by business, organized labor, public officials, community-based organizations and other stakeholders:***

---

DET issued a revised state policy to the WDBs implementing this waiver, and internal fiscal reporting. Participants will be tracked through ASSET, and WDBs will continue to work under the current 10% limit on local administration. Local Program Liaisons will provide on-going oversight and on-site monitoring with the WDBs that choose to participate in this waiver. Monthly expenditure reports will also be a monitoring tool.

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**Waiver title/purpose: Youth Program Procurement Requirements**

Wisconsin is requesting to have waived the requirement of awarding grants or contracts to eligible providers of youth activities on a competitive basis with the previous DOL conditions. This waiver request would simplify procurement requirements for youth services where there are few providers to compete, as is the case in many rural Wisconsin communities.

The waiver was approved only for rural areas, and on a case-by-case Division of Employment Training (DET) review of documented justification from the local area. DOL's conditions are:

- (a) Applicable only to rural areas;
- (b) DET review WDB waiver requests on a "case-by-case basis and approval is granted only when the local area documents that there are no viable providers or that all current providers are underperforming"; and
- (c) DET provide ongoing oversight and onsite monitoring.

**Identify the statutory/regulatory requirements that are requested to be waived**

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WIA Section §123 from funds allocated under Section §128 (b).

**Describe the actions that the State or local area, as appropriate, have undertaken to remove State or local statutory or regulatory barriers:**

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DET has approved two local waivers for the West Central Wisconsin WDB and the North West Wisconsin Workforce Investment Board for program year 2008- 09. DET anticipates extension requests from these WDBs and additional requests for program year 2009-2010 through the local plan process or separate waiver plans.

There have been three notable problems associated with the existing competitive model:

- Over the years there has been progressively less competition and an increasingly limited pool of willing sub-recipients;
- Sub-recipients provide some of the required ten elements well, but not all; and,
- **The cost to provide services in this manner is administratively burdensome and expensive.**

The existing model has resulted in a delivery system that serves a very low number of youth, one that relies on a network of service providers who are not equipped to deliver all ten youth program elements in a comprehensive and efficient manner. Secondly, given that two-thirds of Wisconsin is comprised of rural areas, there are an insufficient number of eligible providers.

It is the intent of this waiver request that when these services can be provided by existing staff and/or through existing or prospective partner arrangements, then the option should exist for the WDBs to use these services. If services cannot be provided by existing program staff or partner agencies, there would be a competitive procurement in compliance with Section 123 of the regulations so that all ten program elements would always be available to eligible youth.

This waiver will contribute to the Governor's effort to reform Wisconsin's workforce system by allowing better service delivery for youth. The waiver would also allow WDBs to provide some service to youth through the virtual Job Center, JobCenterofWisconsin.com.

There are no State or local regulatory barriers to implement this waiver.

***Describe the goals of the waiver and the expected programmatic outcomes if the request is granted:***

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This waiver will accomplish the following goals:

- Establish an easy-to-navigate, coherent case management system for youth that requires minimal movement among service providers;
- Create partnerships to serve youth similar to the partnerships that currently exist by memoranda of understanding to serve Adults in the One-Stop Centers;
- Improve performance levels and monitoring service delivery;
- Create points of collaboration for all youth service providers (public and non-public) affording seamless services to youth; and,
- Increase access to youth services under WIA by better utilizing Youth Centers in the existing One-Stop Career Centers, and creating appropriate satellite centers and website.

This waiver creates an opportunity for WDBs to use current program staff and partner agreements to provide required services and seek competitive procurement of outside services when needed. This is critical and necessary given the current state of resources and limited number of providers in some parts of State, and results in the maximum investment of available resources to directly serve youth.

***Describe the individuals impacted by the waiver:***

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The waiver will directly impact WIA eligible youth.

***Describe the process used to monitor the progress in implementing such a waiver, the process used to provide notice to any Local Board affected by the waiver, Local Board's opportunity to comment on the request, and meaningful public comment by business, organized labor, public officials, community-based organizations and other stakeholders:***

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DET provided guidance to the WDBs in implementing this waiver. Local Program Liaisons will provide on-going oversight and on-site monitoring of the WDBs with this approved waiver. Monthly expenditure reports will also be a monitoring tool.

## Attachment M

### Public Comment Process

In accordance with WIA Section 189(l)(4)(B)(v), CFR 20 §661.420(c)(5), and related guidance, the Division of Employment and Training (DET) provided numerous opportunities for participation in the development of, and comment on, the draft ARRA Addendum Plan and draft Waiver Plan. The draft ARRA Addendum Plan and the draft Waiver Plan were formally issued on May 19, 2009 to workforce partners for a public review and comment period, and they were posted on the workforce website. In order to ensure broad input on the Plans, and increase awareness of the State's workforce ARRA activities, WDB Executive Directors were requested to forward the drafts to other people within their regional business, labor and community and faith-based training and employment network.

The following activities highlight key partner involvement throughout statewide conversations on draft state Plans and waiver issues:

- Wisconsin Association of Job Training Executives (WAJTE) is comprised of the WDBs' executive directors. Their discussions related to common measures waiver opportunity began in September 2007 with the DET Bureau Director, Gary Denis. The DET Administrator, Ron Danowski, was also part of these discussions and met with the directors on April 2, 2008, to further vet waiver issues for the development of the final draft Waiver Plan;
- A WAJTE survey was completed April 14, 2008. The directors identified common measures, increasing the 30% cap on formula fund transfers and incumbent worker training as the three most important waivers to improve their service delivery. On the issue of waiving the youth competitive procurement process, 66.7% of the directors endorsed this waiver;
- ASSET User's Group composed of local and state staff discussed the common measures waiver at their meeting in January 2008 and provided input on the pros and cons; and,
- As mentioned in the Plan text, the Council on Workforce Investment reviewed waiver possibilities while developing their March 2006 and June 2007 recommendations to the Governor on systemic improvements with the workforce infrastructure and in areas of service delivery. The Council's Executive Committee was consulted about the pending draft Waiver Plan at their May 7, 2008, meeting.
- For the second state Waiver Plan and ARRA Addendum, these previous conversations and questionnaires were taken into account, in addition to individual WDB requests. The CWI's June 12, 2009, March 27, 2009, and December 2, 2008 agendas included reports by the DET Administrator for members' input on the draft Plans.
- DET issued a revised state waiver policy on February 10, 2009 to encourage WDBs to request waivers and provide guidance on the DOL waiver approvals for PY 08-09.
- Through the Spring of 2009, the DWD Secretary and DET Administrator have discussed waiver issues at the WAJTE meetings, and DET staff provided technical assistance for WDB Waiver Plan requests.

**Wisconsin's ARRA Addendum  
to the State WIA Modification Plan PY 09-10  
Public Review and Comment and State Response**

**Introduction**

After a wide distribution effort described in the previous page, four people provided comments to the draft ARRA Addendum. The verbatim e-mail comments are quoted below. The [State responses](#) follow each commenter's emails as they were received.

**(1) May 20, 2009:**

Comment was from:

**Ronald (Bud) Gayhart  
Director,  
Center for Innovation & Business Development  
UW-Whitewater  
402 McCutchan Hall  
Whitewater, WI 53190**

"While many of the proposed steps address worker retraining, education and job search assistance, I don't see anything that targets growing "businesses" in any way. If businesses grow and expand they create jobs. Training and education do NOT create jobs. Training and education will enhance worker skills and marketability but what I'm seeing in Janesville is GM workers completing courses at Blackhawk Tech" with the expectation" that they will find new employment providing a good wage. What they are finding is "empty promises" and unmet expectations. That just adds to the bitterness, despair, and anger in the region. We need to assist existing businesses to get them growing again."

**State Response:**

Thank you for taking the time to review and make comments on the Draft State ARRA Plan. Your point about the lack of specific job creation is well taken. The Workforce Investment Act (and the addition of the American Recovery and Reinvestment Act) is a job training program that is designed to support economic development through upgrading skills/retraining/new training development of the workforce. Other portions of the ARRA will provide more direct business expansion through contracts, public works, etc. DWD recognizes that job training does not necessarily create new jobs but the Department is committed to have people trained and ready for new job growth as the recession eases. The Draft Plan also identifies a major new approach to the workforce system through the Sector Strategy Initiative that will have training more in-line with the economic development needs and priorities of regions' businesses.

**(2) May 22, 2009:**

Comment was from:

**Terri Stout**

"I have read the draft and I don't see where it says anything about the unemployment benefits continuing for people who are in school full time. I thought I had heard that the federal government wanted the states to change the UI benefits to cover people in school full time even after the UI benefits had run out. Please let me know the status on this. Thanks"

State Initial Response:

This individual has been contacted by e-mail. We will follow-up with them on the letter referenced below with the letter sent to UI claimants on Pell grants. We will incorporate that into our final response.

Thank you for reviewing the draft ARRA Addendum to the State's WIA State Plan. Yes, there have been conversations on this, and the DWD is working on a communication regarding the unemployment insurance status and the UI approved training issue you raised. Once that has been finalized, I will forward that to you as well as put that information in the ARRA Addendum. A follow-up response included the adopted legislation information referenced on page 15, and the new toll free UI number to better serve people inquiring on this issue.

**(3) June 18, 2009:**

Comment was from:

**Janet L. Washbon, Ph.D.**  
**Associate Vice President**  
**Policy and Government Relations**  
**Wisconsin Technical College System**  
**4622 University Avenue**  
**PO Box 7874**  
**Madison, WI 53707-7874**  
**janet.washbon@wtcssystem.edu**

"Wisconsin Technical College System (WTCS) received a request on May 19, 2009 to review and comment by June 18, 2009 on Wisconsin's Draft American Recovery and Reinvestment Act (ARRA) Addendum that is required to be submitted to the U.S. Department of Labor no later than June 30, 2009.

As requested, the WTCS forwarded the link to the Draft Addendum materials to the technical colleges and solicited comments for submission to the Department of Workforce Development. Attached please find a copy of our comments.

Comments Submitted to the Wisconsin Department of Workforce Development on the Draft Addendum to the State's Workforce Investment Act Plan for Program Year 2009-2010

As part of the American Recovery and Reinvestment Act (ARRA), Wisconsin must submit an Addendum to the State's Workforce Investment Act Plan for Program Year 2009-2010 that was submitted on April 15, 2009 to the U.S. Department of Labor no later than June 30, 2009. The following comments are being submitted by the Wisconsin Technical College System (WTCS) on behalf of its member colleges as part of the review process on the Draft Addendum and as part of the federally required review and comment period.

Given the recent and ongoing experiences of the technical colleges in serving dislocated workers, the WTCS suggests that the Addendum to the State's Workforce Investment Act Plan for Program Year 2009-2010 place greater emphasis on the need for funding for accredited occupational training, adult basic education, and support services needed by Wisconsin's dislocated workers and to address the fiscal challenges and constraints facing the technical colleges in meeting these challenges. Specifically:

### **Ensuring that Retraining Leads to Sustained Employment Benefits.**

WTCS encourages DWD and the state's workforce development boards to identify ways to fund dislocated worker and other adult training programs through accredited training providers such as Wisconsin's technical colleges that provide job training and skills development recognized by employers and other postsecondary educational providers. Retraining programs potentially offer dislocated workers or other individuals experiencing unemployment opportunities to gain educational credentials that can help them advance their careers when employment opportunities occur in the job market. Although non-accredited providers may claim to provide training at a lower cost, the college credits and skill certificates earned by dislocated workers through the technical colleges have been shown to lead to greater employability and future laddering into high skill/high demand occupations with a greater long term payoff for the initial investment in worker training.

### **Funding for Adult Basic Education and Support Services.**

WTCS encourages DWD and the state's workforce development boards to identify ways to promote and support greater flexibility in funding for adult basic education and support services. Currently, technical colleges receive little, if any, funding from WIA programs for dislocated workers or other unemployed adults for providing adult basic education or support services. All too often the emphasis in dislocated worker training projects is on occupational preparation and ignores the reality of most dislocated workers, who have been out of the education system, sometimes for many years. The experience of Wisconsin's technical colleges indicates that dislocated workers bring with them significant needs for adult basic education when they look to pursue occupational preparation in a new or related occupational field. These needs primarily take the form of developmental work in mathematics and reading; this strong academic foundation is of importance for almost every technical program offered by the colleges. In fact, adult basic education is very often the first step in the retraining process for dislocated workers. In addition, adult basic education is a very labor-intensive educational offering where students, to be successful, need to receive significant personal attention. However, because adult basic education, by statute, carries no tuition in the WTCS, the colleges are experiencing great demand for services in this area, but with no corresponding revenue to hire the additional faculty needed. In fact, due to funding shortfalls, access to these needed adult education services are likely to be reduced unless the colleges are able to find additional sources of funding.

Dislocated workers also bring with them all kinds of needs for additional support services. These needs include counseling them through what is essentially the grief process, career planning, job seeking skill development, and basic computing skill development, among others. None of these services are funded by workforce development boards under the pre-ARRA model for reimbursement. Many dislocated workers are overwhelmed and discouraged by the rigor of the classroom, the pace, the use of computers and the need to learn to be a student (again or for the first time). These students would benefit from more support services up front, and during the time they are enrolled in training programs to help them acquire the skills they need. Some technical colleges offer and/or require new program students to enroll and complete a "Student Success" class prior to enrolling in other program courses. These classes provide a proven strategy for helping dislocated workers to know what the college's expectations are of them as a college student and can reduce the initial anxiety and stress about attending college for training or retraining.

Finally, in addition, the Draft ARRA Addendum to WIA State Plan (p. 13) includes an allocation of \$140,000 for a project called "Career 101 Pilots." The WTCS encourages DWD to use this funding to expand useage of *WisCareers*, the state's existing career guidance software currently used by K-12, technical colleges, universities, and Job Centers in the state. The

Career 101 pilot funds could help additional school districts more effectively inform students of career opportunities in high demand occupations and help them chart a course to achieve their career goals. Promoting the use of **WisCareers** could leverage the state's more than 20 year investment in this effort that draws on the resources of DWD's labor market information unit as well as the placement and training information provided by the state's public and private postsecondary educational institutions."

**State Response:**

We have had excellent partnerships with WTCS and the colleges on an array of projects at the state and local levels. These suggestions will help expand our collaborative efforts.

*Ensuring that retraining leads to sustained employment benefits*

The Adult and Dislocated Worker Administrator's Memo [Attachment E included in the ARRA Plan] specifically addresses your comments on the dislocated worker programs, adult basic education and supportive services. While career assessment, job search skills and basic computer literacy were provided to WIA participants when determined appropriate, ARRA funds will assist in augmenting those key services. The Administrator's Memo expanded the basic education services directing the WDBs "to target funds for (1) Adult Basic Education and basic skills training; (2) Filling skill gaps or remediation; (3) Bridge programs as defined in the Wisconsin RISE initiative; (4) Coursework related to preparation toward a career goal." Further, "WDBs are strongly encouraged to use the Wisconsin Technical Colleges in their areas as key training providers as they expend ARRA funds on all types of training, including basic and occupational skills training." Finally, regarding the basic skill deficiencies WTCS identified, the work readiness certification that is being developed will focus on three areas, two being math and reading. These areas have been identified by employers as the primary deficits of job seekers.

*Funding for ABE and Support Services*

DWD has placed a strong emphasis on training and supportive services requiring a minimum of 70% of both the WDBs' Recovery Act Adult and Dislocated Workers allocations to be spent on training. In addition, DWD policy has been to expend a minimum of 35% of formula WIA Adult and Dislocated Worker funds (local allocation and Special Response funds) on training. The training definition was expanded for ARRA funds to cover associated direct costs of the training per the Administrator's Memo: "Training related expenditures for the participant such as supportive services and needs related payments are also allowable in calculation for the 70 percent expenditure requirement." DWD also targeted basic education for ARRA Youth (ages 14 - 24) in the Youth Funds Administrator's Memo: "WDBs must spend at least 25% of their ARRA Youth funds on training with a focus on Adult Basic Education, GED or HSED training, or work readiness certification activities."

For Dislocated Workers, 30% of the WDBs' formula funds are designated for direct intensive services such as adjustment assistance, case management and support services.

With the additional ARRA funds, WDBs have been encouraged to co-enroll individuals in WIA Title I and the Trade Adjustment Assistance program to ensure that a comprehensive package of services is available to each Dislocated Worker. DWD's Administrator's Memo further states that "The WIA program will provide "wrap-around" services, which typically include assessment, case management, job search and placement assistance, supportive services and follow-up services."

The ARRA funds will also assist in augmenting training service contracts, including group training and curriculum development per the Administrator's Memo. In addition, the State has

requested waivers for on-the-job training and customized training in order to further expand training options and flexibility at the local level. These efforts will expand consumer choice beyond the State's Individual Training Account list of which approximately 80% of allowable training programs are from the technical colleges.

DWD will work with WTCS to increase braided funding and co-enrollments between WIA Title I and WIA Title II Adult Education and Literacy. DWD monitoring will specifically include examining adult basic education training sources, funding amounts, and financial aid applications and non-duplication of reimbursement.

Historically, DWD has committed resources to WisCareers. Therefore, DWD agrees with WTCS's comment on the importance of WisCareers, and will assist in expanding its use.

**(4) June 18, 2009:**

Comment was from:

**Dan Johnson**

**Coordinator of Resources for People with Physical Disabilities**

**Department of Health Services**

**1 West Wilson Street**

**Madison, WI**

"As Coordinator of Resources for People with Physical Disabilities I have reviewed the Department of Workforce Development ARRA draft plan and have the following comments which I have attached for your review. I have consulted with my colleague Jennifer Neugart regarding transition services for youth with disabilities. Thank you for the opportunity to comment on this draft plan on behalf of people with physical disabilities."

- NOTE: Comments are the bullet points

***"Page 6-The above ARRA priorities expound on the Governor's vision for ensuring a continuum of education and training opportunities summarized in Wisconsin's State Plan Modification PY 09-10:***

*Developing certification of work readiness that will help employers find entry level workers, and implementing a standard skills assessment tool statewide*

- page 6-7. Resources dedicated to do "customized employment" as defined by the Office of Disability Employment Policy might be a better approach to serve all hard to serve populations. **Using the process of discovery instead of depending on certification and job readiness has been documented by** Office of Disability Employment Policy, as a better process to finding employment for people with disabilities and other hard to serve populations.

***Wisconsin's State Plan addresses the Governor's visions to ensuring the preparation of youth for 21st century industries and jobs including***

*Engaging students in more math and science to excel in jobs with changing technology and product innovation;*

- Resources are needed to better prepare teachers with the skills to teach students. What we have seen regarding the quality of teachers has been so disappointing. Teachers in these areas need to recognize that like a foreign language, math and science have their own language and they have to have the skills to teach that to students. Providing

resources to accelerate the training skills math and science teachers is critical to the success of engaging this youth population. Page 7

- This area is a huge barrier for students with disabilities – probably the biggest barrier for students who later want to go on to higher education. We would see them all the time at UW Whitewater one credit short in math or science, which prevented them from getting accepted to the college. We also know people with disabilities are not encouraged to go into the STEM careers, which is why it's nice to see that Midwest Alliance grant focused specifically on that issue. Teachers need to know more about how to accommodate students so they can fully participate in those STEM courses.

*Developing improved transition strategies for youth with disabilities*

- There should be more emphasis placed on helping high school youth access the Workforce Investment Act supportive services while in high school. DVR needs to take an active role facilitating OJT and customized employment opportunities for youth with disabilities while they are still in high school so that they get the opportunity to have work experience like their peers without disabilities. Glad to see this included on page 7.

***ARRA funds will augment the above priorities to serve youth as well as increasing efforts to reach and engage youth who have been disenfranchised. The Governor recognizes that the economic challenges impact even more significantly on the younger population who have been out of the mainstream, may be struggling to find a job, or, to gain the skills they need to retain or advance to a higher paying job. Wisconsin's focus on ARRA funds for youth entails a combination of summer employment opportunities and the full range of WIA youth services***

- As of the end of the school year June 12, 2009 I had not heard from my daughter's high school special education and regular education programs about a summer youth program or any year-round program. Teachers don't work in the summer and basically nothing will get done to prepare anybody for summer employment referenced on page 8.
- I think if you want to serve youth and young adults and business implementing a statewide initiative modeled after the pilot Medicaid Infrastructure Grant "project search" initiative with sufficient resources for youth and adults with disabilities would make more sense. Assessments, certifications, job placement, job development, are not business terms according to according to a national expert who initiated the project search model in a Cincinnati Ohio hospital. We need a statewide initiative both urban and rural that will pick up where the Medicaid Infrastructure Grant leaves off in 2011. The Project Summer grant through Waisman has excellent data about the importance of summer work experiences.

***The Governor's specific workforce priorities for 2009-10 are to:***

*Support partnerships between business and education through the (a) WTCS Workforce Advancement Training Program. This program establishes a mutual understanding of the types of skills and knowledge workers will need to fill available, good-paying job opportunities, and has already served 90 businesses with 11,900 trained workers; and (b) EISP grants to provide industry, technical colleges and WDBs with the ability to train people for good-paying jobs in the growing sectors of the economy such as biotechnology and renewable energy*

- On top of page 9, how many of the on the 11,900 served were people with disabilities.

*In addition, DWD encouraged the increased usage of supportive services and needs related payments in order to provide greater depth of support for participants.*

- On page 11 more should be done to encourage coordination between DVR and WIA case managers to utilize supportive services and needs related payments for people with disabilities. Not enough is being done to make sure that resources are coordinated to the advantage of people with disabilities. The DWD website doesn't even list WIA as a resource for people with disabilities. You go directly to The Division of Vocational Rehabilitation and there is no referral anywhere else. There is a major disconnect for youth in this area. WIA isn't even on the radar for any of the partners I work with in transition.
- On page 11 it would appear that those most in need have to travel the farthest to regional centers to get services. Will there be any requirements encouraging the job centers to stay open in the evening and on weekends to make themselves available to people with different needs? I think the idea of a statewide computer access system is a good one, but we must remember that individuals who are poor or have little training or experience using computers will not be accessing this new tool and therefore we must make available individuals in real offices that can meet with these people and discuss their employment goals.
- Initiatives on page 12 and 13 seemed to be underfunded.

*[WIA State Plan Modification page 54]*

*Wisconsin is implementing an **expanded Statewide RES initiative** that will have Job Service staff provide a comprehensive orientation session for claimants, not only at the current 22 Job Service staffed Job Center sites, but at additional access points statewide. [Attachments F (Note Attachment G not finalized)] This effort will result in services being provided at 83 additional sites statewide. These orientations will provide information on One Stop programs and services, current labor market information, and will include both group and individual discussion with the claimants through a triage process that determines if a person is job ready, or needs referring to a partner training program, and/or referral to newly developed soft and hard skill assessment services or group counseling services. The outreach, and the detailed assessment and counseling services are not currently part of the Wagner Peyser core services*

- We know that 188 requires compliance, but what resources will be made available to make sure that these sites are going to be accessible to people with disabilities which would include accommodation such as interpreters and material in alternative format? Found on page 16.

### **Facilitated Self Help**

**For Job Seekers:** *Resource Rooms are the setting for facilitated self help in Wisconsin's Job Centers. Job Service is the lead agency and primary provider of Resource Room services. Customer service representatives in the Resource Room who are computer literate; have comprehensive knowledge of the local labor market; understand career planning; are proficient in successful job search strategies and recognize potential eligibility for other One-Stop system services; direct job seekers' attention to jobs for which they may be qualified and make referrals as appropriate based on their knowledge of the labor market in general and specific listings that reflect current recruitment activities; and share their expertise with customers and, in return, customers keep staff knowledgeable about who is looking for work and how best to present job opportunities.*

*Job Service is working on enhancing the resource room experience, including a much stronger focus on staff assisted assessment. In addition to the resource room, Job Service is offering a statewide call center for jobseeker assistance. This allows jobseekers who need additional assistance with services or the new JCW to call a toll free number and access the assistance they need.*

- Here is an example of information for people with disabilities that should be available on the DWD website. Facilitated job help at the one stops on page 18.
- Telephone systems that are automated need to be accessible to people with disabilities who may not have use of their hands or other extremities to push buttons.
- Voice-activated systems need to have backups so that people with disabilities can get to a live person to help them through the process when they do not understand the commands being requested.
- On page 19 there seems to be an opportunity to identify strategies that would help provide resources for "customized employment" and "vocational futures planning" in collaboration with long-term support agencies, DVR, independent living centers and other providers who would want to offer person centered planning approaches to helping individuals who have significant barriers to employment. This will require training of staff to understand these approaches and to discuss strategies to braid and blend funding to accomplish the person centered planning that is needed to help these individuals achieve their employment outcomes.
- Do these numbers include individuals with disabilities on page 24.
- On page 26 is where you will want to also include something about reviewing and revising their fee schedules so that providers are reimbursed for the extra 16 to 24 hours (national average) to do the discovery (planning and assessment) for individuals with disabilities or others who have significant barriers (transportation, personal care on the job, housing) to employment. This is often referred to as customize employment or for people with physical disabilities vocational futures planning. The fee structure is adjusted to recognize the extended period of discovery.
- Bottom of page 26 indicates there is a common WIA intake that will provide a referral to DVR. However in the DWD and ARRA webpage the only reference to services for people with disabilities leads to the Division of Vocational Rehabilitation and their intake process only allows an individual to apply for DVR services. DWD webpage should also direct people to the broader intake and the DVR webpage should definitely direct you back to WIA services.
- On page 28 there is reference to new training sites, how will you ensure that these training sites are accessible and if they are not how will they be assessed for their barriers and how will people be accommodated until the sites are accessible?
- Offering people with disabilities an opportunity to serve on advisory boards/committees is not the same as requiring their presence on the boards/committees which would be one way to demonstrate that you are serious about the accessibility and universal access of your one stops.

**Disability Related Training** DET will augment the previous year's technical assistance on benefits counseling to WIA case managers to include other workforce partners as well as focus on Section 188 for the new delivery sites. TAT and collaboration with MCOs and Employee Resources Inc. will also be conducted through PY 09-10 for additional WIA case manager education particularly with increased activity of the Ticket-to-Work program.

- On page 32 this disability related training provides an opportunity to include training on "customize employment" and "vocational futures planning" for case managers and vocational rehabilitation counselors so that they may take advantage of these new person centered planning approaches to help people with severe barriers to employment achieve their employment outcomes."

#### State Response:

##### *Customized Employment and Process of Discovery*

We appreciate the comments that will assist us to continue improving our WIA services for persons with disabilities and other targeted population groups. The "customized employment" concept is currently not built into the workforce infrastructure, policies or processes. DWD will conduct additional research on the model and consider the approach as another strategy within the new state policies being developed related to WIA training services.

##### *Universal Access*

DWD is committed to meeting the letter and intent of WIA "universal access." Some examples of ongoing activity include:

- DWD's Division of Employment and Training serves as the liaison with the Governor's Council on Workforce Investment Medicaid Infrastructure Grant Subcommittee that has kept disability-related issues on the forefront;
- DWD committed staff resources to participate in the ambitious DHS Managed Care and Employment Task Force, and is working on rolling out their pertinent recommendations;
- DWD issued WIA/ARRA Adult Administrator's Memo and the WDB Local Plan Guidelines that included several areas related to braided funding and co-enrollments with VR as well as coordination efforts with Managed Care Organizations;
- DWD received federal grant funding for Disability Navigators to increase expertise at the job centers and create systemic change on inclusion; and,
- DWD sponsored the Youth ARRA day-long training with job center staff included technical assistance on outreach and inclusion of persons with disabilities.

##### *Teacher Preparation*

DWD agrees that teacher preparation and awareness are important factors to achieving employment. It is unfortunate that students you know were not informed of the WIA/ARRA Summer Youth Employment Program. DWD worked closely with DPI, Cooperative Education Service Agencies and the WDBs to promote the ARRA program. We will continue to reach out through DVR, K-12 schools and DPI to support awareness of WIA programs. Efforts to serve disabled individuals will be incorporated in Opportunity Grants and Skills Jump Start.

##### *Certification and Job Readiness*

Job readiness certifications are a principal requirement by USDOL for youth in ARRA. Work readiness assessment is also recommended by CWI. DWD will ensure that the statewide skills assessment tool, Work Keys, will be available in other formats in order to meet accommodation

requirements. The work readiness certification will focus on three areas that have been identified by employers as the primary deficits of job seekers: math and reading levels and locating information.

#### *Enhancing Job Seeker Assistance and Improved Transition Services*

The Job Centers have specific areas to better serve youth one-on-one, with materials and information about job readiness and career development to better prepare them for the world of work with appropriate training choices.

The DWD WIA Youth Policy staff person serves on the Wisconsin Statewide Transition Initiative for Youth with Disabilities Committee that has representatives from various agencies coordinate efforts. The commenter's input will be requested to be on the agenda for discussion at the next meeting of this body. DWD will discuss with DHS Medicaid Infrastructure Grant administrator the possibility of the suggested statewide initiative for a collaborative pilot project.

To acknowledge the critique regarding the lack of connectivity and specific service delivery information on the program websites, DWD will work with (1) DHS to improve the Vocational Rehabilitation and WIA websites for user friendly information with increased linkages in order to improve the program's coordination and services for persons with disabilities, and (2) VR to increase WIA/VR co-enrollments for effective use of joint resources.

#### *Statewide RES Initiative*

RES is funding that specifically targets those who are unemployed. As with all DWD federally funded programs, people with disabilities are included. RES activities are delivered through Job Centers and other public facilities that already meet accessibility requirements. For customers needing additional accommodations, a common intake form is currently being developed for RES claimants to identify the individuals' needs followed by prompt efficient services along with appropriate referrals. During the assessment process for RES, individuals with disabilities who are identified will receive accommodations necessary to participate in RES activities.

#### *Customer Services*

The current DWD and UI telephone systems are not voice-activated and the commenter's suggestion will be considered for possible implementation for systemic change at the state and local levels. Specific to RES contacts, the additional new staff will be able to be contacted via their cell phone numbers for immediate access. The DWD RES Workgroup that meets weekly and reports to the Team will discuss this concern with possible solutions for accessibility. DWD also has a Job Seekers' Call Center where applicants can receive assistance with some aspects of their workforce development programming.