3.6 Program Waitlists – Revision 1 | Policy Effective Date: May 13, 2021
Summary of Comments and DWD-DET's Responses

1) **Comment:**
You have included this: *Note: Career planners may not deny an individual the opportunity to apply to a WIOA Title I Program, even if a waitlist is in place.*

Then how can there be a waitlist for entry into the program if you've indicated we cannot deny applications?

Response:
According to the first paragraph of the policy, "A waitlist can be used either for **program-eligible individuals waiting to enter into a program**, or for existing program participants waiting to receive direct cost services," (emphasis added). Consistent with 8.2.1 (Adult Program), 8.2.2 (Dislocated Worker Program) and 10.3.1 (Youth Program), all individuals must be given the opportunity to apply to the WIOA Title I-B programs, and an eligibility determination service must be completed for everyone who applies. If a program entry waitlist is in place, only those individuals determined eligible for the program should be put on the waitlist. Individuals who are determined ineligible should not be placed on a waitlist but should be referred to other programs if appropriate.

2) **Comment:**
Another monitoring nightmare in the making.

3.6.1 - I'm good with having to put folks on the list for either purpose. However, I don't care for the fact that there will then need to be yet another policy for 'failed contact attempts' (last bullet point in first section).

Response:
DWD-DET is now requiring local Workforce Development Boards that are implementing a waitlist to provide its Local Program Liaison a copy of its waitlist policy, including procedures for handling waitlists to ensure that customers are treated equitably. It is problematic if individual career planners adopt their own rules as it could lead to unfair or inequitable practices and results.

3) **Comment:**
3.6.2 - This is scary - although I see they have now figured out how to fix the 'lifetime' eligibility issue that existed - I can live with having to do the data request to get someone re-opened rather than having to re-register someone.

Response:
There does not appear to be a question associated with this comment, so DWD-DET is unable to respond.

4) **Comment:**
One commenter stated, "I see no absolutely no constructive purpose in contacting people on a waitlist every 90 days if they are not already participants. This is pure busy work and would be extremely inefficient use of time especially if the list was large. Who is going to do this all the time? You could have a full case load and then another full case load of non-participants. Where is the commitment of the participants? It doesn't seem like too much to ask for there to be some

responsibility for the folks on the list to have to keep us informed.....many more of them than us. All this is doing is creating the potential for complaints from customers because you'll spend all your time trying to reach folks and documenting it for folks who aren't even in the program and get on the list just to 'get on the list'. Ridiculous and huge waste of time. Those folks that are really interested in the services will stay in touch with us.

I don't have issue with requiring a service every 90 days for participants since this is already the case to keep folks active."

Another commenter stated, "We have concerns about requiring staff to contact individuals on a program entry waitlist every 90 days. This seems like an unnecessary burden for Career Planners, especially if the wait list was large. Career Planners could have a full case load and another full load of non-participants to contact routinely."

Response:
DWD-DET appreciates the feedback and recognizes that this requirement could potentially present challenges. As such, DWD-DET revised this portion of the policy to state, "DWD-DET strongly encourages staff to contact individuals on a program entry waitlist at least once every 90 days to confirm they remain interested in the program; it may be helpful to record the results of the contact in an ASSET case note."