# Summary of Comments and DWD-DET's Responses – 8.3.3 Adult Program Enrollment Benchmarks

Policy Effective 7/1/2023

## Two comments ask for "public assistance recipients" to be added to the bulleted list in the policy to mirror how TEGL 7-20 defines the priority groups.

DWD-DET omitted “recipients of public assistance” in the bulleted list because any participant who receives public assistance is considered low-income, see "[Low Income Guidance](https://dwd.wisconsin.gov/wioa/policy/appendices/A.5.htm)" in the Titles I-A and I-B Policy Manual. For clarity, DWD-DET has added "recipients of public assistance” to the bulleted list in the policy.

## There were a few comments on the effect this policy may have on enrollment numbers. Commenters stated that enrollment is low, and they are concerned this policy may have a negative impact on enrollment numbers. A commenter also stated concern that this policy may be used to "determine program eligibility or 'appropriateness'."

The DOL established 50.1 percent benchmark is an expectation, it is not a requirement. DWD-DET is unclear how this policy would negatively affect enrollment numbers as this policy does not change the eligibility criteria for the Adult program. Furthermore, this policy should not be used to determine eligibility or "appropriateness" for the Adult Program. Please see policy [8.2.1](https://dwd.wisconsin.gov/wioa/policy/08/08.2.htm#sectionOne) in the Titles I-A and I-B Policy Manual for the Adult Program eligibility.

DOL's vision is to maximize the resources of the workforce system to "serve adults most in need of assistance from the public workforce system." DWD-DET encourages WDBs to utilize the outreach, training, and coordination suggestions in [TEGL 7-20](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL_7-20.pdf) to increase the WDB's percentage of individuals in the three priority groups listed in the policy.

## There were a couple of comments stating this policy may negatively affect training eligibility and performance. Specifically, if DWD-DET starts using the "[Low Income Guidance](https://dwd.wisconsin.gov/wioa/policy/appendices/A.5.htm)" definition instead of the current Economic Self-Sufficiency (ESS) Calculator to determine eligibility for training services it would decrease participants' ability to access WIOA-funded training.

This policy does not change the eligibility criteria for training services, please see policy [8.5.1](https://dwd.wisconsin.gov/wioa/policy/08/08.5.htm#sectionOne) in the Titles I-A and I-B Policy Manual for eligibility for training services. Career Planners should continue to use the ESS calculator to determine if the participant "is in need of training services to obtain or retain employment that leads to [economic self-sufficiency](https://dwd.wisconsin.gov/wioa/policy/08/08.3.htm#sectionFour+ESSRequirements) or wages comparable to or higher than wages from previous employment."

## There was a question as to how the policy defines low income and if it is based on Federal Poverty Level or Lower Living Standard Income Level.

DWD-DET defines low-income status based on the "[Low Income Guidance](https://dwd.wisconsin.gov/wioa/policy/appendices/A.5.htm)" in the Titles I-A and I-B Policy Manual.

## There were a couple of comments requesting DWD-DET to adjust the benchmark based on each WDAs' program performance, economic conditions, median income, and demographic composition. One commenter recommended changing the policy from "DWD-DET **requires** that each local WDBs meet or exceed the minimum rate of 50.1 percent of participants in the Adult Program are from at least one of the above priority groups throughout their area," to "DWD-DET **expects** that each local WDBs meet or exceed the minimum rate of 50.1 percent of participants in the Adult Program are from at least one of the above priority groups throughout their area."

According to the BI Launchpad report, "Title 1 Adult Priority Groups" ten of the eleven WDAs are currently exceeding the expected 50.1 percent benchmark. [TEGL 7-20](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL_7-20.pdf) does not make an allowance for states to negotiate the expected 50.1 percent benchmark.

DWD-DET appreciates the feedback regarding changing the verbiage from "requires" to "expects." The policy has been updated based on the feedback.

## There was a concern about the lack of adults who meet the definition of basic skills deficiency.The comment states "this has the potential to lead to missed opportunities to serve those who need services in order to meet benchmarks and not performance goals."

Basic Skills deficiency is one criterion to meet the benchmark for this policy. According to the BI Launchpad report, "Title 1 Adult Priority Groups" ten of the eleven WDAs are currently exceeding the expected 50.1 percent benchmark when calculating all three criteria.

This policy should not be used to determine eligibility for the Adult Program. Please see policy [8.2.1](https://dwd.wisconsin.gov/wioa/policy/08/08.2.htm#sectionOne) in the Titles I-A and I-B Policy Manual for the Adult Program eligibility. This policy should also not be used to determine eligibility for funding training in the Adult program. Please see policy [8.5.1](https://dwd.wisconsin.gov/wioa/policy/08/08.5.htm#sectionOne) in the Titles I-A and I-B Policy Manual for eligibility for training services.

DOL's vision is to maximize the resources of the workforce system to "serve adults most in need of assistance from the public workforce system." DWD-DET encourages WDBs to utilize the outreach, training, and coordination suggestions in [TEGL 7-20](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL_7-20.pdf) to increase the WDB's percentage of individuals in the three priority groups listed in the policy.

## One commenter asked how local areas will ensure the benchmark is achieved.

WDBs can self-monitor their progress toward achieving the benchmark by regularly pulling the BI Launchpad report, "Title 1 Adult Priority Groups." If changes are needed, the WDBs are encouraged to utilize the recommendations cited below from [TEGL 7-20](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL_7-20.pdf).

[TEGL 7-20](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL_7-20.pdf) provides actions to improve efforts to serve individuals from the priority groups, including:

1. Cross-train staff from different programs to understand other partner programs and to share their expertise about the needs of specific populations, including those most in need, so that all staff can better serve all customers.
2. Staff the center with career counselors skilled in advising job seekers of their options, who are knowledgeable about local labor market dynamics, aware of available services inside and outside the AJC, and skilled in developing customers’ skills for employment success.
3. Develop and implement operational policies that achieve an integrated system of case management, using technology to achieve alignment in service delivery that meets customers’ needs.
4. Partner across programs, including community-based and philanthropic organizations, to effectively maximize necessary services, including supportive services, to those most in need while minimizing duplicative processes and resource use.
5. Develop outreach strategies with partner programs to ensure that those most in need are identified and served. Outreach strategies should include referrals across federal, state, local, community-based organizations, and philanthropic organizations, including those that provide supportive services.
6. Encourage, develop, and implement the use of career pathways for those most in need.

[TEGL 7-20](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL_7-20.pdf) also gives examples of how different partner programs can help ensure that WIOA Adult program participants from the priority populations receive the services they need, including:

1. WIOA Youth (Title I)

The WIOA Youth program serves both in-school youth (ISY) ages 14-21 and out-of-school youth (OSY) ages 16-24 with barriers to employment. All ISY must be low-income to be eligible for the program. Many OSY must be low-income to be eligible.

1. Temporary Assistance for Needy Families (TANF)-Wisconsin Works (W-2)

The TANF program is a required partner in AJCs, and in addition to cash assistance, can provide multiple supports for the priority populations in the WIOA Adult program. By closely partnering with the TANF program, the workforce system can help TANF participants obtain the skills they need to achieve self-sufficiency.

Wisconsin contact information: <https://dcf.wisconsin.gov/w2/parents/locator>

1. Supplemental Nutrition Assistance Program (SNAP)—Foodshare (FSET)

SNAP offers nutrition assistance to millions of eligible, low-income individuals and families while providing economic benefits to communities, and also can provide support to recipients to enter and stay in employment.

Wisconsin contact information: <https://dhs.wisconsin.gov/fset/fset-regions.htm>

1. Adult Education and Family Literacy Act (AEFLA)

AEFLA serves adults who are over 16 years of age and who are not enrolled or not required to be enrolled in school under a state’s compulsory school laws. Participants are basic skills-deficient, English language learners, or without a high school diploma or its equivalent. A large percentage of participants are low-income.

Wisconsin Technical College contact information: <https://www.wtcsystem.edu/colleges/>

1. Community Service Block Grant

As a WIOA partner program, the Community Service Block Grant (CSBG) is another program that can integrate with the WIOA Adult program to serve and support low- 9 income individuals and families.

Wisconsin contact information: <https://www.wiscap.org/>

1. Continuum of Care (CoC) Program

HUD’s Continuum of Care (CoC) Program is designed to promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers and state and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

Wisconsin contact information: <https://www.hud.gov/states/wisconsin/working/cpd/coccontacts>