### I. Transitional Jobs (TJ)

- a. If we use a model that includes any form of a traditional transitional job will DWD be upfronting resources so that we can make payroll for those participants?
  - i. For this program DWD will not be making advances. However, DWD Finance does prioritize reimbursements and subrecipients are paid by ACH within 3 working days. Reimbursement can also be requested frequently if needed
- b. Is there an expectation that CBOs be paid?
  - i. Subawards are allowable with CBOs or other entities; however, Uniform Guidance procurement standards must be adhered to.
- c. Will we need to have our own policy for TJs, or will we be allowed to come up with one specific to this program?
  - i. WDAs may use the same local policy used for WIOA Title I or they may have one specific to WAI. If you propose a policy specific to this program, please include it in your application.
- d. Current transitional jobs programs have strict eligibility criteria. What eligibility criteria is in place for the Worker Advancement Initiative participants?
  - i. Flexibility is allowed with this funding. Please identify the population you intend to serve and how you will determine eligibility.
- e. What successes have been identified from current transitional jobs programs so that these applications can build upon these best practices?
  - i. DWD will post best practices shared by the Department of Children and Families upon receipt.
- f. Is there any flexibility now in taking the cash to do some transitional jobs but also do other things?
  - i. There is flexibility in this initiative; however, your application, including your budget, must identify how your plan will serve people whose previous employment has not come back post-pandemic, as well as those who were not attached to or were not successful in the labor market prior to the pandemic, by offering subsidized employment and skills training opportunities with local employers.

#### II. Vets

- a. Would Vets be considered one of the special populations? Are we limited to the populations listed in the application?
  - i. WAI funds must be used to serve people "having difficulty finding or maintaining strong employment ties." The <u>WAI summary page</u> provides a list of examples and expressly notes that applicants are not limited to serving those populations. Please address the populations you intend to serve in the application.

#### III. On-the-Job Training (OJT)

- a. What type of documentation or guidelines will be required for determining eligibility of individuals, proof of payment of payroll, OJTs, TJs, supportive services?
  - i. OJT, TJ, and supportive services documentation will follow the same guidelines as WIOA and local policy.
- b. Are the local boards meant to deliver OJT services through this initiative in the same manner as traditional WIOA OJTs?
  - i. There are no WIOA-related limits on the provision of OJT for services funded solely

by WAI. OJT provisions funded totally or in-part by WIOA must follow WIOA and local policy.

#### IV. Co-enrollment

- a. Is there an expectation that these individuals be co-enrolled in WIOA?
  - i. While there is no requirement that grant participants be co-enrolled in WIOA, the purpose of the WAI is to effectively connect participant job seekers to employers and allow them to obtain enhanced case management and training services offered under WIOA, as stated on the summary page. Co-enrollment strategies is an evaluation criterion on the Applicant Evaluation Checklist that will be considered during DWD's evaluation of grant applications.
- b. What percentage of participants are meant to be co-enrolled in WIOA?
  - i. There is no specific minimum of grant participants that must be co- enrolled in WIOA.
- c. Am I understanding correctly that they do not NEED to be co enrolled with WIOA, but it's encouraged?
  - i. While there is no requirement that grant participants be co-enrolled in WIOA, the purpose of the WAI is to effectively connect participant job seekers to employers and allow them to obtain enhanced case management and training services offered under WIOA, as stated on the summary page. Co-enrollment strategies is an evaluation criterion on the Applicant Evaluation Checklist that will be considered during DWD's evaluation of grant applications.
- d. If we were to serve co-enrolled (Title 1) participants, could we increase the current rate of employer reimbursement from 50% to 75%?
  - i. Regarding the number '75%' in the question, the Answer below is written with the assumption that this question is asking about OJTs. Yes, WIOA regulations allow Local Workforce Development Boards to increase the employer reimbursement rate for OJTs. 20 CFR § 680.730 states that a Local WDB may increase the reimbursement rate for OJT contracts up to 75 percent, when the following factors are considered:
    - 1. The characteristics of the participants taking into consideration whether they are "individuals with barriers to employment," as defined in WIOA sec. 3(24);
    - 2. The size of the employer, with an emphasis on small businesses;
    - 3. The quality of employer-provided training and advancement opportunities, for example if the OJT contract is for an in-demand occupation and will lead to an industry-recognized credential; and
    - 4. Other factors the Local WDB may determine to be appropriate, which may include the number of employees participating, wage and benefit levels of the employees (both at present and after completion), and relation of the training to the competitiveness of the participant.
  - ii. This regulation requires that Local WDBs must document the factors used when deciding to increase the wage reimbursement levels above 50 percent up to 75 percent.
  - iii. Additionally, Local WDBs must adhere to their local OJT Policy when serving participants who are co-enrolled in WIOA.

#### V. Performance

a. The WIOA performance measures are listed as what we are being measured on since those are mostly exit measures well after a person leaves the program is there an expectation we do follow up if they are not co-enrolled in WIOA or any other program?

i. Yes.

- Confused by the questions below when the program has WIOA performance measures, what are you looking for with this question as you spell out those who could be served under the grant as well as part of the scoring is related to coenrollment? "How will the WDB use the funds awarded under this program to provide more flexible eligibility criteria than what exists in its traditional employment and training programs to improve employment outcomes for underserved individuals in your area? For example, the WDB should identify specific individuals/groups who will be served, why they have not previously been served, how they will be identified and included in this program, and what the anticipated benefit of including them will be."
- i. WAI funds provide flexibility in the customers served. Applicants must identify the population(s) "having difficulty finding or maintaining strong employment ties" that you intend to serve. If enrolled participants belong to populations served under WIOA, DWD will, and would encourage Local WDBs to, use outcome data to inform future program and policy decisions in the future.
- How are questions 1 different than question 2? What is the expectation when responding to those two questions for which they are very similar?
- b. What is the period of performance? Will period of performance include the entire 2 years or will enrollment into activity stop some time before the end of the contract period?
  - i. The period of performance will be a two-year period, so most enrollments need to occur during the first year of the grant so adequate follow-up services can be compelted during the grant period.
- c. What are the performance percentage rates for 2<sup>nd</sup> and 4<sup>th</sup> quarter after exit and MSG for this initiative? Same as current WIOA negotiated rates?
  - i. Yes, the same as WIOA negotiated rates.

### VI. LMI & Wages

- a. What is the expected minimum wage if your do the math at \$15.00 an hour at 1040 hours which is your traditional TJ you come to \$15,600 in just wages alone which does not includes any other cost? To get at 2000 people served for \$2 million DWD had to use some figure.
  - i. The \$10,000 cost per participant is an average.
- b. I am a little confused by LMI brief how are we supposed to use that in relation to our programs, given the short turn around it does not allow us to do much innovation related to information provided.
  - i. WAIis funded in whole by the American Rescue Plan Act (ARPA). DWD prepared and provided the Labor Market Brief, which includes additional resource links and direct contact information of DWD's Regional Economic Advisors, as a resource to WDBs during the application process to assist in their efforts to explain how they will strategically implement this program based on the state of its workforce area as impacted by the COVID-19 pandemic.

- c. What percentage of the wage is to be subsidized by this funding? How many total hours can be subsidized?
  - i. There are no limits to what percentage of wages may be subsidized. Include what you propose in the application.
- d. What is the intended wage for the work experience opportunities? \$14.22 or \$16.75 per hour as listed in the LMI data?
  - i. Use Wisconomy for your local LMI data.
- e. There really is not clarification on the wage we can provide. I went with the 14.22 based on the LMI information vs. minimum wage.
  - i. Use Wisconomy for your local LMI data.
- f. What is the rate of pay we can pay?
  - i. Use Wisconomy for your local LMI data.
- g. Is there a minimum or maximum wage subsidy requirement? \$14.22 per hour is referenced a few times in the Labor Market Brief.
  - i. Use Wisconomy for your local LMI data.

### VII. Federal Poverty Guidelines & Economic Self-sufficiency

- a. While I ask a documentation question up above the question below asks how will we validate an individual who falls under the federal poverty guidelines, so are you saying we get to determine the documentation/proof of eligibility so therefore no wrong answer to the question?
  - i. Yes. Applicants must identify their strategy in their application.
- b. How will the WDB validate and verify individuals who fall under the federal poverty guidelines? How will the WDB provide on-the-job training opportunities that will lead to economic self-sufficiency?
  - i. Applicants must identify their intended strategy in their application.
- c. Will there be the use of the Economic Self Sufficiency tool/threshold requirements for training under this initiative?
  - i. WIOA does not apply to participants funded solely be WAI, and so those participants would not need an ESS calculation to determine training eligibility. Only participants who receive Individual Training Account- funded training with WIOA funds, inwhole or in-part, will be required to have an economic self-sufficiency calculation performed in order to establish training eligibility.
- d. Are incumbent workers eligible for this initiative? If so, will there be adjusted poverty level guidelines for this initiative?
  - i. Incumbent workers may be eligible if this is identified as one of the strategies in your application if you can demonstrate their previous employment has not come back post-pandemic or were not attached to or were not successful in the labor market prior to the pandemic.

#### VIII. Services & Benefits

- a. Is there a category in the budget that can be used for "outreach" for candidate recruitment, particularly to outreach to specific individuals/groups who have not previously been served?
  - i. Use the "other" category.
- b. Is there a requirement that people served be in "qualified census tracks"?

- i. There is no requirement that grant participants be from certain census tracks.
- ii. Use Wisconomy for local market information.
- c. WIOA guidance states that Local WDBs may provide program-funded supportive services (such as childcare) through the Adult and Dislocated Worker Programs when: it can be demonstrated that they cannot access the supportive services, within the time frame needed, through other WIOA titles, federal or state public assistance programs, or job center partners in the Local WDA.<sup>4</sup> How will supportive services under this initiative differ from the guidance provided for WIOA?
  - i. There are no WIOA-related limits on supportive service provision for services funded solely by WAI. Supportive services funded totally or in- part by WIOA must follow the Supportive Services policy in the WIOA Policy Manual.
- d. What kind of incentive payments are allowed through this initiative?
  - i. Incentive payments made without WIOA funding are not subject to WIOA incentive payment limitations.
- e. Can fringe benefits, such as health insurance, be included in the subsidies?
  - i. Yes, health insurance may be reimbursed if the WDB can show the costs are allowable under 2 C.F.R. 200.431.
- f. Is it possible to serve newly hired incumbent workers to help them advance?
  - i. Incumbent workers may be eligible if this is identified as one of the strategies in your application if you can demonstrate their previous employment has not come back post-pandemic or were not attached to or were not successful in the labor market prior to the pandemic.
- g. Question 1 asks how the WDBs will use the funds to provide more flexible eligibility criteria. However, question 2 asks about efforts to recruit populations who are having a difficult time finding or maintain employment. Is it a requirement that WDBs create a separate strategy for this or can WDBs utilize their current WIOA outreach strategies as it seems to closely align with WIOA efforts?
  - i. Either approach is acceptable as long as you identify the strategy you will use in your application.

# IX. Eligible Training Provider List (ETPL)

- a. Is it required that training programs be on the ETPL if it was solely funded by WAI?
  - i. If a participant being served by WAI funds is receiving training funded solely by WAI, the training program is not required to be on Wisconsin's ETPL.

## X. WIOA Policy vs. WAI

- a. Will WDBs be required to follow their existing WIOA policies (e.g., OJT, support services) or will WDBs have the option to create separate WAI policies?
  - i. Either is acceptable, but if a participant is co-enrolled in WIOA and the OJT is WIOA-funded, local policies must be adhered to.

#### XI. Miscellaneous

- a. Will the "hard and soft skill training" require an industry-recognized credential, or can a "certificate of completion" be acceptable?
  - i. WAI does not require a credential. Applicants should consider how their program

design will best serve people whose previous employment has not come back postpandemic, as well as those who were not attached to or were not successful in the labor market prior to the pandemic

- b. Do the employers have to be based in our local area or can they be outside the local area?
  - i. There is no requirement that employers engaged in the services to participants through this grant be located within a WDB's Workforce Development Area boundaries.
- c. What is the definition of "in-demand jobs" for this initiative? Does it align with the sectors identified by local boards?
  - i. Yes. Local WDBs should use their identified "in-demand" sectors.
- d. Is there a goal for breakdown between service type for the budget? (i.e., 35% in training/OJT)
  - i. No.
- e. Is the WAI cap of \$10k per participant above and beyond our local policy of \$10K training?
  - i. Only WIOA-funded participants are subject to local ITA-related and other caps for training services. Local WIOA policies do not apply to non-WIOA fund sources, such as the WAI grant.
- f. Capitation (I am unfamiliar with this term but Rhonda and Chytania shared)—we pay funds out, then get reimbursed 25/25/25/25 when goals are hit. Do we know how the reimbursement will work for these?
  - i. Reimbursement for WAI expenditures will work the same as all DWD-DET federally funded programs. DWD will not be making advances. However, DWD Finance does prioritize reimbursements and subrecipients are paid by ACH within 3 working days. Reimbursement can also be requested frequently if needed.