

DRAFT FOR PUBLIC REVIEW AND COMMENT

MAY 19, 2009

WISCONSIN'S

AMERICAN RECOVERY and REINVESTMENT ACT

ADDENDUM

to the

WORKFORCE INVESTMENT ACT

STATE PLAN PROGRAM YEAR 2009- 2010



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to
Wisconsin's Plan Modification Program Year 2009 - 2010**

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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.

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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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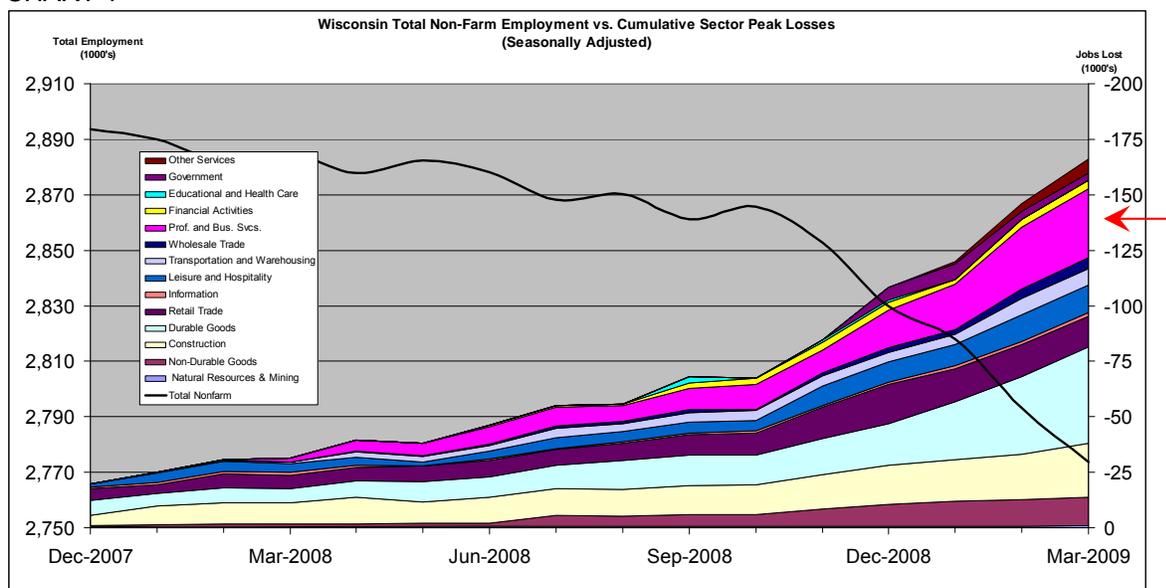
TABLE 2 TOTAL NON-FARM WAGES 1999 THROUGH 2008

		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 2007¹ and demonstrates the rapid decline in jobs in the six months ending March 2009.

CHART 1



¹ 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.²

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

Industry	Temporary Employment Services Concentration
Natural Resources & Mining	0.57%
Construction	13.10%
Manufacturing	6.37%
Retail Trade	6.50%
Information	1.67%
Leisure and Hospitality	8.08%
Transportation and Warehousing	4.47%
Wholesale Trade	2.77%
Prof. and Bus. Services.	19.03%
Financial Activities	2.37%
Educational and Health Care	24.13%
Government	3.03%
Other Services	5.07%

Based on this supposition, we anticipate few additional job losses in the administrative support sector. Chart 2 combines the estimated job loss in the remaining business sectors with the temporary employment information. (See reduction in job losses at Arrow.)

Chart 2 and a detailed analysis of QCEW data on job loss through the fourth quarter of 2008 suggest the following sectors lost the greatest number of jobs since the end of September 2008. They are the wood products and transportation equipment groups in the durable goods sector,

² 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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clothing store, food and beverage, home improvement and gardening, building supply and truck transportation within the retail sector, and the leisure and hospitality sector.

The progression of job losses in the various sectors demonstrated in Charts 1 and Chart 2 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 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 21st 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).

Governor Doyle's vision is estimated to create or save 70,000 jobs in Wisconsin through the recovery plan. He immediately **established the Governor's Office of Recovery and Reinvestment** and Internet site <http://www.recovery.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 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

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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 TEGL 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 21st 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);
- 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;

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- 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 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 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;

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- 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 [Ill.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

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:

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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.]

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

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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.*
- *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;

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- 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 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.

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- **\$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 crossagency 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 representatives 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, 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:

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- 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.

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 meets regularly.

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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. A bill is anticipated to pass the State Legislature in May.

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 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.*

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- *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 (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.

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 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

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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.

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

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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 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

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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.

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

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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 44 additional 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 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

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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 WDB representatives, 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 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.

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.

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

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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.

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

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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 were surveyed and their projections anticipated serving 2,500: 14 to 18 year olds; 1,290: 18 to 21 year olds; and, 2,50 21 to 24 year olds. [Note: The actual numbers will be entered after local plans are returned prior to submission to DOL]

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.*

[Wisconsin WIA State Plan Modification PY 09-10, Page 61]

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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, May ____ 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 ____ 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 adhoc 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 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

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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 was issued on May 19, 2009 for public review and comment.

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]

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 44 additional staff and located at multiple additional sites across the state.

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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.

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]

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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]

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:

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- 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 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

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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. 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.

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

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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 response 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 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. 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.

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Annual Monitoring

- October - December 2009: The annual monitoring on WIA and ARRA Youth, Adult and DW programs will be conducted that will include file reviews and on-site visits. In addition to the explanation of the annual review in the WIA State Plan Modification, the following areas will be highlighted in 2009:
 - New Veterans questions (IX.C.5.b.) and WDB statistical analysis;
 - Selective Service;
 - On-the-job training and customized training;
 - Needs-related payments;
 - Co-enrollments;
 - Waivers; and
 - Assurances

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.
- 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 TEGL 17-05, Attachment B Definition of Key Terms):

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- *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.

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**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

Adult Measures	PY 2007	PY 2008	PY 2009
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
Dislocated Worker Measures			
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
Older Youth Measures			
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
Younger Youth Measures			
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
Youth Common Measures			
Youth Placement into Employment/Education			72.00
Youth Degree/Certificate Attainment			75.00
Youth Literacy/Numeracy Gains			17.00
Customer Satisfaction Measures			
Participant ACSI	76.90	78.90	Waived
Employer ACSI	77.90	79.80	Waived

***Wagner-Peyser Act Performance Levels
Measures***

	PY 2007	PY 2008	
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

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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

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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

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

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

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

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

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 _____

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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

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WDB: Workforce Development Board

WIA: Workforce Investment Act

WRTP: Wisconsin Regional Training Partnership

WTCS: Wisconsin Technical College System

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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.
5. Nothing in this order shall be interpreted to require the employment of apprentices if such employment may

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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:

DOUGLAS LA FOLLETTE
Secretary of State

Attachment E

Department of Workforce Development
Administrator's Memos

DEPARTMENT OF WORKFORCE DEVELOPMENT
DIVISION OF EMPLOYMENT AND TRAINING

ACTION 9-02
 NOTICE

ADMINISTRATOR'S MEMO SERIES

*** 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.

***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

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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.

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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.

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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.

* Nontraditional Training includes entrepreneurial training, Asset building, financial literacy training, and Micro- enterprise development.

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- 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.

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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.

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

DRAFT ARRA ADDENDUM TO WIA STATE PLAN for PUBLIC REVIEW and COMMENT

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.

***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
Programs**
TA--Trade Assistance

**TR--Transportation
WIA--Workforce
Investment Act**
**YA--Youth
Apprenticeship**

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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.

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- 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

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<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.

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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 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.

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).

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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.³

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

³ Staff Report – Green Jobs: A Pathway to a Strong Middle Class, Middleclass Taskforce, chaired by Vice President Joe Biden.

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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.

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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**

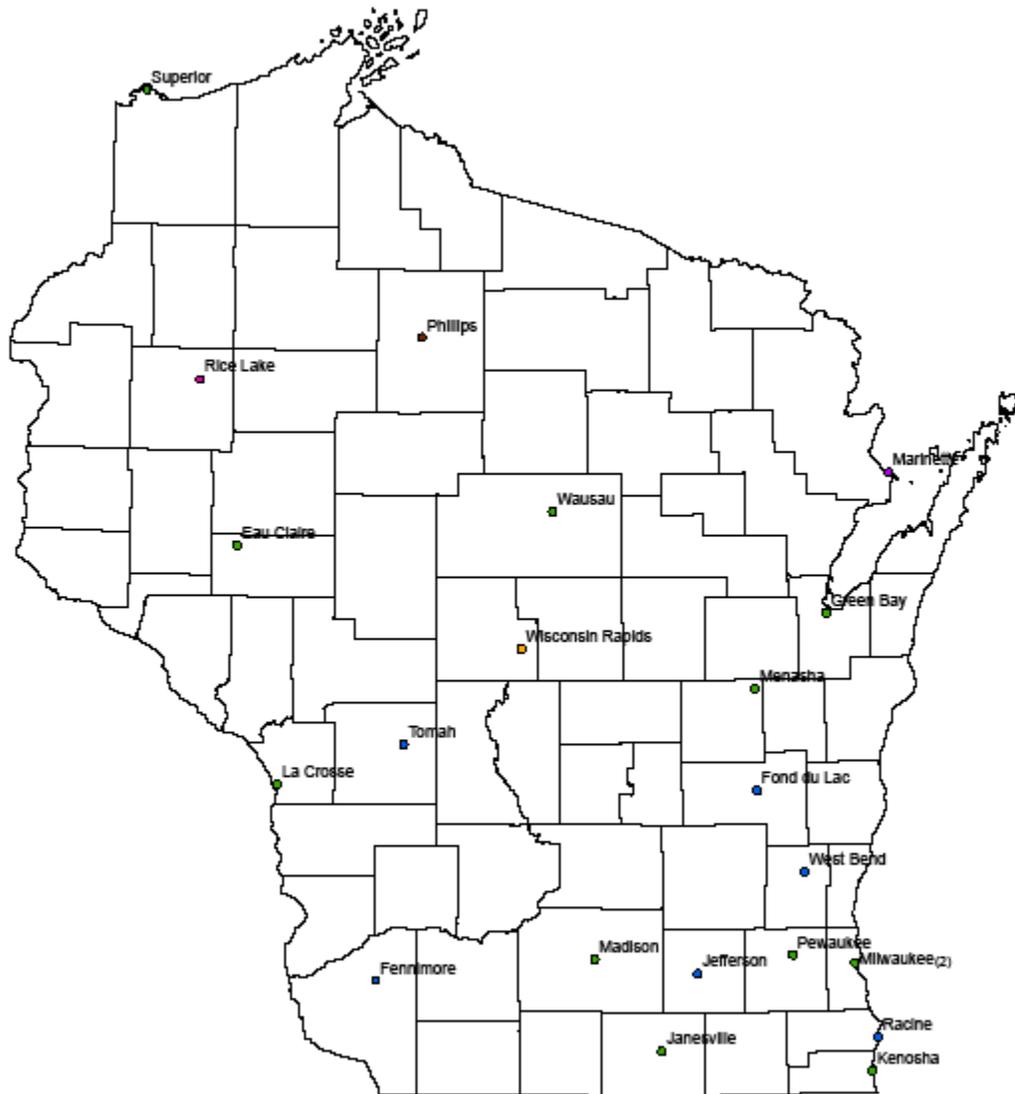
WDA Name		Youth		
			Share	Allocation
1	Southeast		8.44%	\$990,638
2	Milwaukee		36.29%	\$4,260,036
3	WOW		4.63%	\$543,067
4	Fox Valley		6.30%	\$739,060
5	Bay Area	X	7.77%	\$912,114
6	North Central		6.64%	\$779,402
7	Northwest		6.70%	\$786,846
8	West Central		6.87%	\$806,099
9	Western	X	3.00%	\$352,081
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

Attachment F

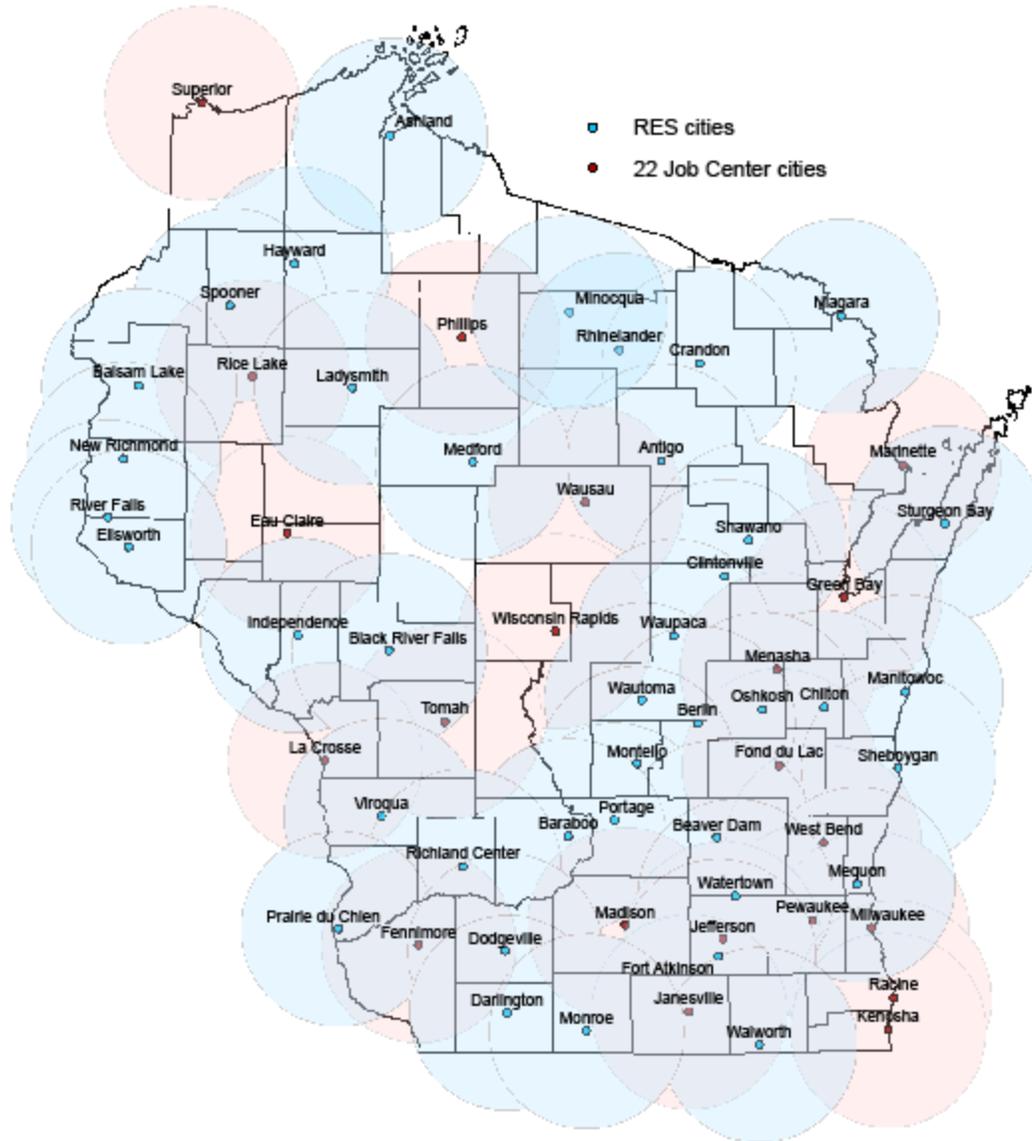
22 Wisconsin Job Centers



Wisconsin Department of Workforce Development, Labor Market Information
File: S:\DET\BWT\LMIArcGIS\Heather\requests\JobService\job centers 2008 buffers.mxd

1/29/2009

Job Service Proposed RES Locations



**DRAFT ARRA ADDENDUM TO WIA STATE PLAN for PUBLIC REVIEW and COMMENT
Attachment H**

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May 2009

Veteran Program Policy Letter 2-09

TO: DET Deputy Administrator, WDB Directors, Veteran Program Managers, Job Service Directors, Job Center Managers, DOL Program Managers (WIA, TAA, DW, Senior Community Service), LVERs, DVOPs, DVET (DOL/VETS)

**FROM: Kenneth G. Grant, State Veteran's Program Manager
Office of Veteran's Service, Division of Employment & Training**

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/teq/teq/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-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>

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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 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.**

One-Stop Career 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 One-Stop 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

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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 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.

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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 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.

The information to be collected shall include, but is not limited to:

- 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 §

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1010.10 to distinguish covered from non-covered persons receiving services and, within covered persons, to distinguish veterans from eligible spouses.

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. 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.

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.

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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 21st 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:

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- 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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Required attachments include:

- Assurances and Signatures
- Form A Debarment and Suspension Certification
- Form B Lobbying Certification
- Form C Youth Service Providers
- Form D Quarterly Enrollment and Budget Summary (Adult and Dislocated Workers)
- Form E Quarterly Enrollment and Budget Summary (Youth Program)
- Form F Budget Summary (Adult and Dislocated Workers)
- Form G Budget Summary (Youth)
- Form H Staffing Plan (Adult, Dislocated Workers, Youth)

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

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 21st 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).

3. 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.

**Certification Regarding
Debarment, Suspension, Ineligibility and Voluntary Exclusion
Lower Tier Covered Transactions**

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.

Name and Title of Authorized Representative

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 charged 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**

Youth Service Provider	Contact Information	Services Provided	Est. Number of Youth Served in Summer of 2009 (ARRA Only)	Est. Number of Youth Served in Year-Round Activities (ARRA)

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
ARRA Funded Activities											
Total Participants											
Receiving Intensive Services											
Enrolled in Training											
Occupational Classroom											
OJT											
Customized (Employer Based)											
Receiving Supportive Services											
Receiving Needs Related Payments											
ARRA Program Expenditures											
Core and Intensive Services											
Training											
Supportive Services											
Needs Related Payments											
ARRA Administrative Expenditures											
TOTAL ARRA Expenditures											

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
ARRA Funded Activities											
Total Participants											
Enrolled in Work Experience											
Receiving ABE/GED/Work Ready											
Receiving Supportive Services											
Receiving Stipends											
ARRA Program Expenditures											
Youth Wages & Stipends											
Training (ABE/GED/Work Ready)											
Supportive Services											
ARRA Administrative Expenditures											
TOTAL ARRA Expenditures											

ARRA Back-up Budget			
<u>Adult</u>	<u>Dislocated Worker</u>	<u>WDA</u>	
	Administration	Program	Total
Staff Salaries			
Staff Fringe Benefits			
Staff Travel			
Communications			
Facilities (rent, utilities, maintenance)			
Office Supplies			
Testing and Instructional Materials			
Equipment			
Use/Depreciation			
Purchase			
Lease			
Training			
Classroom (tuition, books, fees, etc.)			
OJT Reimbursements			
Customized Training			
Supportive Services			
Needs Related Payments			
Audit costs			
Contracted Services			
Total			

ARRA Back-up Budget Youth			
WDA _____	Administration	Program	Total
Staff Salaries			
Staff Fringe Benefits			
Staff Travel			
Communications			
Facilities (rent, utilities, maintenance)			
Office Supplies			
Testing and Instructional Materials			
Equipment			
Use/Depreciation			
Purchase			
Lease			
Training and Services			
Wages & Stipends			
ABE/GED/Work Ready			
Supportive Services			
Audit costs			
Contracted Services			
Total			

**ARRA Staffing
Plan**

___ Adult ___ Dislocated Worker ___ Youth WDA _____

Administrative Staff Salary and Benefits				
Position	Monthly Total	% Charged	# Months	Total
Administrative Staff Total	\$ -			\$ -
Program Staff Salary and Benefits (include contracted staff)				
Position	Monthly Total	% Charged	# Months	Total
Program Staff Total	\$ -			\$ -
Staffing Total				

Attachment K Monitoring

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 how these will be conducted.

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 a desktop review; 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. Any items needing immediate corrective action such as safety hazards or illegal working conditions will be addressed immediately at the worksite and follow-up will continue until solutions are ensured. 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.

Annual Monitoring

- October - December 2009: The annual monitoring on WIA and ARRA Youth, Adult and DW programs will be conducted that will include file reviews and on-site visits. In addition to the explanation of the annual review in the WIA State Plan Modification, the following areas will be highlighted in 2009:
 - New Veterans questions (IX.C.5.b.) and WDB statistical analysis;
 - Selective Service;
 - On-the-job training and customized training;
 - Needs-related payments;
 - Co-enrollments;
 - Waivers; and
 - Assurances

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:

- 1) TEGL 14-08 published March 18, 2009 ;
- 2) Administrator’s Memo Series 09-01 issued April 16, 2009
- 3) WIA State ARRA Supplemental Plan related to youth program;
- 4) WIA Local ARRA Supplemental Plan related to youth program;
- 5) WDA’s list of worksites;
- 6) WDA’s worksite agreement template;
- 7) ARRA youth participant data in ASSET;
- 8) ASSET and Webi reports;
- 9) CORE financial reports; and
- 10) Child Labor Law literature from Wisconsin Equal Rights Division (take extras for possible distribution during onsite reviews)

1. Desk Review

- Request for proposals used to procure summer work experience services (if applicable);
- List of worksites (separate by public and private sector); and
- Worksite agreement template.

Items Reviewed
Local Plan

Comments/Observations

Request for Proposals used to procure summer work experience services

List of Worksites

Worksite Agreement Template

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? Describe the transition process. (*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? (*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. Discuss if it 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? Where could one find the duties in written format?
- 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.

DRAFT - WIA AND ARRA YOUTH FILE REVIEW

Participant Name:

PIN:

WDA:

Service Provider:

Reviewer:

Review Date:

PARTICIPANT PROGRAM STATUS (Choose one only):

COMMENTS:

- Yes No WIA Youth Formula Services Only
- Yes No ARRA Only - Summer Work Experience
- Yes No ARRA Only - Providing Several Program Elements
- Yes No WIA and ARRA - Both Providing Services

PARTICIPANT DATA, GENERAL ELIGIBILITY & CASE DOCUMENTS

COMMENTS:

- Yes No Local application form (signed and dated)
- Yes No Age 14-21 (If WIA only)
- Yes No Age 14-24 (If ARRA only)
- Yes No U.S. citizen or eligible to work in U.S.
- Yes No N/A Selective Service
- Yes No N/A Veteran documentation
- Yes No Participant Rights/Complaint form
- Yes No Release of Information form
- Yes No N/A PELL/Other Financial aid
- Yes No Case notes (comprehensive, up-to-date, WIA & non-WIA)

WIA Youth is between ages: YY 14-18 *or* OY 19-21

ARRA Youth is between ages: YY 14-18 *or* OY 19-24

Youth is In-School: (Attending any school) *or*

Out-of-School: (Dropout; *or* graduate/holds GED, but is basic skills deficient, unemployed or underemployed)

PROGRAM ELIGIBILITY:

AND IS WITHIN ONE OR MORE CATEGORIES:

LOW INCOME

- Yes No Public Assistance (_____)
- Yes No Low-income (Family size & family income)
- Yes No Food Stamps
- Yes No Homeless
- Yes No Foster Child
- Yes No Disabled

- Yes No Basic skills deficient
- Yes No School dropout
- Yes No Homeless/runaway/foster child
- Yes No Pregnant or parenting
- Yes No Offender
- Yes No Needs additional assistance

OR

- 5% Low income exception window
 - Yes No School dropout
 - Yes No Homeless or runaway
 - Yes No Pregnant or parenting
 - Yes No Offender
 - Yes No Disabled
 - Yes No Basic skills deficient (per WIA Section 101(4))
 - Yes No One or more grade level(s) below age-appropriate level
 - Yes No Face serious barrier to Employment

Eligibility Documentation Reviewed/Comments:

OBJECTIVE ASSESSMENT & INDIVIDUAL SERVICE STRATEGY

COMMENTS:

- Yes No Objective Assessment (basic skills, occupational skills, prior work experience, interests/aptitudes, support service needs, NTO, etc.)
- Yes No Individual Service Strategy (based on assessment, measurable skill attainment goals, jointly developed)
- Yes No ISS includes non-WIA services; is reviewed & updated

DESIGN FRAMEWORK & SERVICES (FOR ARRA SUMMER WORK EXPERIENCE ONLY)

COMMENTS:

Yes No Design Framework (dates)

Yes No Paid Work Experience (dates) _____

Yes No Supportive Services (dates)

Yes No Work Readiness (dates) _____

Yes No Stipends for Youth In Training (dates)

Yes No Other services (dates)

Yes No Services ended on September 30, 2009 or sooner

Yes No Services concur with assessment and ISS

Yes No Work Experience Agreement in file

Yes No Payroll timesheets are in the file.

DESIGN FRAMEWORK & SERVICES (FOR WIA AND YEAR ROUND ARRA):

COMMENTS:

Yes No Design Framework (dates)

Yes No First Youth Service (dates)

Yes No Supportive Services (dates)

Yes No Other services (dates)

Yes No Services concur with assessment and ISS

Yes No N/A Gap in service (documented)

Yes No N/A Work Experience Agreement

WORK READINESS GOAL: (FOR ARRA SUMMER WORK EXPERIENCE ONLY)

COMMENTS:

Yes No First goal set on date of first service

Yes No Measurable goal related to local policy

Yes No File contains documentation to support the goal was met

TRANSITIONING OF ARRA YOUTH: (FOR ARRA SUMMER WORK EXPERIENCE ONLY)

COMMENTS:

If the youth turned 24, check what happened.

Yes No ARRA services ended, not put into any other WIA Program.

Yes No ARRA services ended, youth became a WIA participant.

EXIT INFORMATION:

COMMENTS:

Yes No Exit documented in case notes

Yes No Follow-up services provided

Yes No N/A Supplemental employment data

Yes No N/A Exclusionary exit

WOULD INFORMATION REPORTED IN ASSET PASS UNDER DATA VALIDATION AND IS IT ACCURATELY REPORTED FOR PERFORMANCE?
(FOR WIA Title 1 only)

- Yes No **(All Youth) Employment Status at Participation**
- Yes No **(All Youth) Enrolled in Education Status**
- Yes No **Older Youth Only: Credential Type**
- Yes No **Younger Youth Only: Type of Skill Attainment Goal**
- Yes No **Younger Youth Only: Date that Skill Attainment Goal Set**
- Yes No **Younger Youth Only: Goal Attainment Status**
- Yes No **Younger Youth Only: Date that Skill Attainment Goal Attained**
- Yes No **All Youth: Attainment of diploma, GED, or Certificate**
- Yes No **All Youth: Date that Degree or Certificate Attained**
- Yes No **All Youth: School Status at Exit.**
- Yes No **All Youth: Youth Placement First Quarter After Exit**
- Yes No **All Youth: Youth Retention Third Quarter After Exit**
- Yes No **All Youth: Assessment Done Via Approved Test for ABE**
- Yes No **All Youth: Assessment Done Via Approved Test for ESL**
- Yes No **All Youth: Functional Area that Youth Tested In**
- Yes No **All Youth: Date that Pre-Test Administered**
- Yes No **All Youth: Score of Pre-Test**
- Yes No **All Youth: Pre-Test Education Level**
- Yes No **All Youth: Date that Post-Test Administered**
- Yes No **All Youth: Score of Post-Test**
- Yes No **All Youth: Post-Test Education Level**

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:

- 1) TEGL 14-08 published March 18, 2009;
- 2) Administrator’s Memo Series 09-02 issued April 16, 2009
- 3) WIA State ARRA Supplemental Plan related to adult and dislocated worker program;
- 4) WIA Local ARRA Supplemental Plan related to adult and dislocated worker program;
- 5) ARRA adult and dislocated worker participant data in ASSET;
- 6) ASSET and Webi reports; and
- 7) CORE financial reports.

1. Desk Review

Items Reviewed
Local Plan

Comments/Observations

**Adult Planned Vs. Actual
Enrollments**

**Dislocated Worker Planned Vs.
Actual Enrollments**

**Adult Planned Vs. Actual Program
Expenditures**

**Dislocated Worker Planned Vs.
Actual Program Expenditures**

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 Work Force 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 Work Force 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.

- 1) Based on the interview, are there any concerns about the ARRA's adult and dislocated worker 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.

Follow Up Needed.

Technical Assistance Needs. Identify technical assistance needs of the WDB or program provider.

DRAFT

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).

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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

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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:

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:

- 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:

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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.

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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:

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:

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:

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:

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.

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Continued Service Plans for Participants:

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:

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.

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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;

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- 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:

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:

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.

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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.

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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:

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:

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

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:

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.

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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:

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:

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:

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.

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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 waiver plan. The draft plan was formally issued on May 19, 2009 to partners for a public review and comment period, and it was posted on the workforce website. [Note Post Review Period: [Attached are the comments received within the review period and the state's responses.](#)]

The following activities highlight key partner involvement throughout statewide conversations on waiver issues:

- Wisconsin Association of Job Training Executives (WAJTE) is comprised of the Workforce Development Board's 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 were conferred about the pending draft waiver plan at their May 7, 2008, meeting.
- For the second state waiver plan, these previous conversations and questionnaire were taken into account, in addition to individual WDB requests. The CWI's March 27, 2009, and December 2, 2008 agendas included state waiver plan reports by the DET Administrator.
- 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 Administrators have discussed waiver issues at the WAJTE meetings, and DET staff provided technical assistance for WDB waiver plan requests.