

Wisconsin Additional Information Requested

- VIII.G.4.a. Denial of initial ETP eligibility**
- VIII.K.5. Reallocation Verbiage**
- IX.H.1.&2. FBCO Opportunities to participate in O/S system
And increase access to FBCO customers to O/S system**
- X.d.1.d. Continuous Improvement via setting of performance goals**
- X.D.2. Tracking services/performance of target groups**

Compliance Question VIII.G.4.a. Denial of Initial ETP Eligibility

This question asks if the plan describes the procedures the Governor has established for providers of training services to appeal a denial of eligibility by the local board or designated State agency.

Page 39 of the plan describes the appeal process for removing a program or provider from the state ETP list. It appears that neither the PY 2007 narrative, nor the PY 2005 narrative, describe the appeal process to be used when a training provider is initially denied eligibility from the ETP list. Please describe.

Compliance Question VIII.K.5. Reallocation

Page 44 of the plan indicates that “The state has a process in place for recapturing and reallocating funds. If a WDB is below the 70% expenditure rate or 80% obligated at the end of year one, reallocation will occur.” The verbiage associated with the requirement to obligate at least 80% of allocated funds complies with 20 CFR 667.160. The State’s verbiage in the plan associated with the 70% expenditure rate, however, is in violation of 20 CFR 667.107 (b)(1) & (2). This section of the Federal Register specifically indicates that local areas have a two-year period to expend the funds. This section does not require a 70% expenditure rate and does not authorize States to recapture funds during the first year.

Please note that similar verbiage was submitted in the State’s PY 2005 WIA State Plan and was cited as a compliance issue in the June 29, 2005, plan approval letter that was sent to the Governor.

In response to our June 29, 2005 approval letter, on July 22, 2005, Secretary Roberta Gassman sent ETA corrected verbiage to comply with Section 667.107 and 667.160 of the Federal Register. In a September 19, 2005, letter to the Governor, ETA acknowledged receipt of the correct information indicating the corrected information is consistent with the Federal Register.

The State is again requested to submit corrected verbiage which provides for recapture of obligatory authority after year one and the recapture of unexpended funds after year two, in accordance with 20 CFR 667.160 and 667.107.

Compliance Question IX.H.1.&2. Faith Based and Community Organizations

This section of the plan asks States to describe activities undertaken to increase the opportunities for participation of Faith Based and Community Organizations (FBCOs) as active partners in the One-Stop delivery system and to expand the access of FBCO clients & customers to the services offered by the One Stop.

The plan on Page 79 indicates that FBCOs have been essential in outreach for the workforce system. The verbiage also states that DWD encourages WDBs to elicit FBCO involvement and that WDBs are encouraged to examine the relationship of W-2 (TANF) with the FBCOs. The plan also indicates that the W-2 has used FBCOs extensively and can provide examples regarding how to use these organizations more effectively. Finally the plan indicates that WDBs will be encouraged to use FBCOs to provide services such as outreach, counseling, mentoring, etc.

Please expand the plan narrative to provide examples of how FBCOs are actively involved in E&T programs or have been given opportunities to become active partners in the One-Stop system, and how FBCO customers have received expanded access to the One-Stop system. Also, please provide examples of how the W-2 program has used FBCOs effectively and the potential adaptation for employment and training programs.

It would be helpful if the State would also provide the name of a point of contact who is responsible for ensuring that State policies and guidelines are updated to comply with the Federal Equal Treatment Regulations.

Compliance Question X.D.1.d. Performance Continuous Improvement

This question asks the State to describe how levels of performance help the state achieve continuous improvement.

Page 80 & 81 of the plan narrative does not appear to address how the State's level of performance will result in continuous improvement of performance. Please note that this is a requirement per 20 CFR 136(b)(3)(A)(i)(II) which states "show the progress of the State toward continuously improving in performance." Please provide additional information showing how the State's performance levels help the state to achieve continuous improvement.

Page 69 of the PY 2005 plan indicates that the State has had trouble meeting some of its performance goals. As a result, the State should update its 2007 plan verbiage, especially since some of the PY2007/2008 proposed performance goals do not appear to demonstrate continuous improvement.

Technical Assistance Question X.D. 2. Services/Tracking for Target Groups

This question asks the State to describe in its plan the targeted applicant groups for which the state tracks services and performance.

It appears that Pages 81 & 82, as well as Attachment M of the plan, address the tracking of Veterans' (Title 38) services and performance. The plan appears to be silent, however, regarding the tracking of services and performance for other applicant groups under WIA Title 1 and the Wagner Peyser Act (WP) such as services to, and performance for, public assistance recipients, the disabled, older workers, displaced homemakers, out of school youth, etc.

The State is encouraged to revise this section of the Plan to describe the tracking of services and performance for other applicant groups under WIA Title 1 and the WP Act.

(Please note that the PY 2005 Narrative was also silent on this issue.)