# Summary of Comments and DWD-DET's Responses – 2.8 One-Stop Delivery System and Job Center Certification

Policy Effective 7/1/2024

1. A comment stated there does not appear to be a "Federal basis for these updates."

Federal regulation [20 CFR § 678.800(a)](https://www.ecfr.gov/current/title-20/chapter-V/part-678/subpart-F/section-678.800) states:

1. The State WDB, in consultation with chief elected officials and Local WDBs, must establish objective criteria and procedures for Local WDBs to use when certifying one-stop centers.
2. The State WDB, in consultation with chief elected officials and Local WDBs, must review and update the criteria every 2 years as part of the review and modification of State Plans pursuant to [§ 676.135 of this chapter](https://www.ecfr.gov/current/title-20/section-676.135).

(2) The criteria must be consistent with the Governor's and State WDB's guidelines, guidance, and policies on infrastructure funding decisions, described in [§ 678.705](https://www.ecfr.gov/current/title-20/section-678.705). The criteria must evaluate the one-stop centers and one-stop delivery system for effectiveness, including customer satisfaction, physical and programmatic accessibility, and continuous improvement.

## "Can you clarify that the Workforce Development Boards do not have the responsibility to assess service locations of core partners who have co-located in separate locations from Title 1? If this is accurate, what other job centers would WDBs be required to recertify?"

To clarify the requirement, the policy has been updated to include only comprehensive and affiliate job centers as defined in [WIOA Title I-A & I-B Policy & Procedure Manual, Ch. 2.2.3](https://dwd.wisconsin.gov/wioa/policy/02/02.2.htm#sectionThree).

## "The local WDBs do not have the authority to require partners, including DWD, to provide services outside of regular hours. Historically, many boards have struggled to get meaningful participation in after-hour events, so we would recommend that this example be removed."

DWD-DET acknowledges that providing services outside of regular business hours can be challenging; therefore, this is a recommendation not a requirement. The local Workforce Development Board (WDB) should work in conjunction with its Job Center partners to assess the public's need for extended hours.

[WIOA Title I-A & I-B Policy & Procedure Manual, Ch. 2.2.3](https://dwd.wisconsin.gov/wioa/policy/02/02.2.htm#sectionThree) states, "Hours of operation should be negotiated as part of the one-stop delivery system MOU development process, and should be documented in the MOU."

## "The text of Section 2.8.2 also allows for local WDBs to 'develop additional criteria or set higher standards' which 'must be included in the WIOA Local Plan.' With local planning now wrapping up, what is the proposed timeline for boards that may want to make more immediate changes due to the creation of this policy?"

Please see [WIOA Title I-A & I-B Policy & Procedure Manual, Ch. 1.5.3](https://dwd.wisconsin.gov/wioa/policy/01/01.5.htm#sectionThree), for further clarification on when local plans are required to be modified. Also, the local WDB has the flexibility to modify their local plan at any time.

The next scheduled two-year modification will be in 2026.

## "Can you further expand on the reason for the seven-day public notice period? This additional level of administrative burden and associated cost is concerning."

In the interest of keeping the public informed of changes to their local Job Centers, DWD-DET has made the decision a seven-day notice period is appropriate.

The local WDB has the ability to disseminate public notices through various channels that incur no costs and impose minimal administrative burdens. This may include posting on social media, attaching a sign on the Job Center entrance, or updating the WDB's website.

## "The text of Section 2.8.3 discusses 'established local policies and procedures.' Are these set by DWD or are they to be created by the local WDB? Can you provide further guidance regarding the timeline for the creation of these policies or critical content components?"

To clarify the requirement, the policy has been updated to state, "established local policies and procedures, **if applicable**."

It is not necessary to create policies and procedures. This statement is only relevant if there are policies and procedures already created.

## One commenter addressed the Job Center Certification Checklist website accessibility requirements. The commenter stated, "The Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA is the technical standard for state and local governments web content and mobile apps."

Thank you for the information. DWD-DET and the Council on Workforce Investment (CWI) will take this under consideration during the next Job Center Certification cycle.