WISCONSIN PYS 2020-2023

# CONTENTS

Wisconsin PYs 2020-2023 ..... 1

I. WIOA State Plan Type and Executive Summary ..... 3

a. WIOA State Plan Type ..... 3

Combined Plan Partner Program(s) ..... 3

b. Plan Introduction or Executive Summary ..... 3

II. Strategic Elements ..... 15

a. Economic, Workforce, and Workforce Development Activities Analysis ..... 15

b. State Strategic Vision and Goals ..... 40

c. State Strategy ..... 42

III. Operational Planning Elements ..... 47

a. State Strategy Implementation ..... 47

b. State Operating Systems and Policies ..... 67

IV. Coordination with State Plan Programs ..... 111

V. Common Assurances (For All Core Programs) ..... 111

VI. Program-Specific Requirements for Core Programs ..... 113

Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B ..... 113

Program-Specific Requirements for Wagner-Peyser Program (Employment Services) ..... 136

Program-specific Requirements for Adult Education and Family Literacy Act Programs ..... 163

Program-Specific Requirements for Vocational Rehabilitation (Combined or General) ..... 178

VII. Program-Specific Requirements for Combined State Plan Partner Programs ..... 255

Temporary Assistance for Needy Families (TANF) ..... 255

Employment and Training Programs Under the Supplemental Nutrition Assistance Program (Programs Authorized Under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4))) ..... 284

Trade Adjustment Assistance (TAA) ..... 304

Jobs for Veterans' State Grants ..... 304

Performance Indicator Appendix ..... 317

All WIOA Core Programs ..... 317

Other Appendices ..... 317

# I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

## A. WIOA STATE PLAN TYPE

This is a combined plan

### COMBINED PLAN PARTNER PROGRAM(S)

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

## B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

**Overview**

The Workforce Innovation and Opportunity Act (WIOA) challenges the state to combine resources and create partnerships and to look to labor market data and industry research to determine which skills the workforce needs and to focus on the creation of a workforce that can meet the expectations of the future economy. Wisconsin's Department of Workforce Development (DWD) and the Wisconsin Technical College System (WTCS) have a strong tradition of utilizing partnerships to support and grow Wisconsin's workforce; this creates a solid foundation for WIOA implementation.

Three new partners have joined the Program Year 2020-2023 Combined State Plan – the Departments of Children and Families, Health Services, and Corrections. The WIOA Combined State Plan continues to build on the framework created in the PY16-19 Combined State Plan, creating one workforce development system with a "no wrong door" approach to enhance the services available to the current and future workforce and businesses. The state continues to work on enhancing its data and case management systems to achieve the strategic goals outlined in this plan. These strategic goals were developed through collaboration with our partners and stakeholders, forming a strong foundation for WIOA's success in Wisconsin.

This WIOA Combined State Plan was jointly developed by one state team, guided by the WIOA Leadership Team. The WIOA Leadership Team is comprised of executive level leadership from all of Wisconsin's Combined State Plan programs. The strategic and operational planning elements were written with input from and approval by the WIOA Leadership Team, while program-specific requirements were written by each program and shared for vetting with the WIOA Leadership Team.

**WIOA State Plan Type**

Wisconsin is submitting a Combined State Plan. This plan includes the WIOA core partners of:

- Titel I - Adult, Dislocated Worker, Youth (DWD);
- Title II – Adult Education and Family Literacy Act (WTCS);
- Title III – Wagner-Peyser Act (DWD); and
- Title IV - Vocational Rehabilitation (DWD).

It also include the following optional programs:

- Temporary Assistance for Needy Families Program (DCF);
- Employment and Training Programs under the Supplemental Nutrition Assistance Program (DHS);
- Trade Adjustment Assistance for Workers Programs (DWD);
- Jobs for Veterans State Grants Program (DWD); and
- Reintegration of Ex-Offenders Program (DOC).

**Economic Analysis**

Wisconsin's economy continued to grow in 2018, as shown by an increase in real gross domestic product (GDP) from 2017 to 2018. The state's employment-to-population ratio exceeds that of the U.S., and Wisconsin's unemployment rate has declined from 3.1% in May of 2018 to 2.8% in May of 2019.

The real story in Wisconsin is not of industry job growth or occupational demand; rather, it is one of labor force and workforce constraints. There is existing demand for workers in almost every industry, occupation, and geography. On one hand, there is a quantity challenge as Wisconsin's workforce does not have enough workers to fill existing jobs. On the other hand, there is a quality challenge as the existing workforce needs training to increase and update workers' skills. Slowing population growth, retiring Baby Boomers, and attractiveness to place or location are changing the workforce landscape.

Wisconsin's population growth from natural increase is predicted to steadily slow after 2020, as the birth-to-death ratio goes from 1.45 (over the period 2010-2020) to 1.16 (2030-2040). Net migration is projected to provide minimal increases. Moreover, the state's population is aging. The percentage of Wisconsin's population 65 years and older was 13.7% in 2010. That percentage increases to 23.7% in 2040, almost doubling in number. Meanwhile, the percentage of the working age population (18-64) goes from 62.8% in 2010 to 55.1% in 2040.

**Workforce Analysis**

Employment in Wisconsin continues to increase, albeit at a slow pace. The employment-to-population ratio continues to exceed the national rate. The state's labor force participation rate currently (May 2019 = 67.3%) is 4.5 percentage points higher than the national rate (May 2019

= 62.8%). Wisconsin's unemployment rate has dropped through the economic recovery to as low as 2.8% on a monthly seasonally adjusted basis.

Individuals with Barriers

WIOA defines a number of populations which may experience barriers to employment. Wisconsin recognizes that many of its residents may experience difficulty gaining and maintaining employment.

- There are 860,108 individuals that are considered low-income, as defined by earning less than 125% of the federal poverty level wage (2017 American Community Survey).
- There are 49,261 American Indians or Alaska Natives (and an additional 45,773 residents that claim some Native American heritage) in the state and an additional 1,811 Native Hawaiians or Other Pacific Islanders (2017 American Community Survey).
- There are 52,573 youth (those under age 18) in the civilian non-institutionalized population that have significant disabilities (2017 American Community Survey).
- According to Cornell University's 2017 Disability Status Report the overall percentage (prevalence rate) of working age people (ages 21 to 64) with a disability in Wisconsin was 9.6%.
- According to the same report, the overall percentage for people with a disability ages 16 to 20 in Wisconsin was 6.8%.
- On the average night, there are approximately 5,000 homeless individuals, with roughly half (47.4%) a part of families with minor children (Wisconsin Balance of State Continuum of Care – January 2017).
- As of December 31, 2018, 465 youth 17 years of age and older were in out-of-home care (Wisconsin Department of Children and Families).
- 185,754 individuals in the state speak English less than "very well" (2017 American Community Survey).
    - At the end of October 2019, Wisconsin had 14,886 Temporary Assistance for Needy Families (TANF)/Wisconsin Works (W-2) participants.
    - According to the 2018 Migrant Labor Report, there are 4,493 migrant and seasonal farmworkers (includes dependents) in Wisconsin, as defined at section 167(i) of WIOA and Training and Employment Guidance Letter (TEGL) No. 35-14.
    - In FFY 2018, the Refugee Services Program served 440 refugees in Employment and Training activities. In FFY 2019, 448 refugees were served.

***Unemployment***

In 2018, there were 92,200 unemployed people in Wisconsin. Of that total, 39,100 people were unemployed less than five weeks, 24,900 people were unemployed between 5-14 weeks, 11,400

people were unemployed between 15-26 weeks, and 16,800 people were unemployed 27 weeks or more.

***Characteristics of Those Not in the Labor Force***

According to the Current Population Survey, in 2018 (annual average), 1.49 million or 32.4% of the civilian, non-institutionalized population aged 16 and over did not participate in the labor market. Of this population, the large majority (95%) indicated that they did not want a job. This cohort includes 181,000 residents between the ages of 16 and 24 seemingly due to educational commitments, as well as 1,033,800 residents over the age of 55 who have largely entered into retirement. This demonstrates two key facts of labor force non-participation, namely that large numbers of age-eligible individuals have either not yet entered the active workforce or have aged out of it.

***Status of Labor Force Subgroups***

There are a number of groups within this larger population who face more Significant Barriers to Employment (SBE) and therefore require special services such as those provided under WIOA. Among these groups are individuals with disabilities, veterans, the incarcerated population, and low income individuals.

*Individuals with Disabilities:* There are 677,949 individuals in the civilian, non-institutionalized population in Wisconsin that self-identify as having a significant disability, according to the 2017 American Community Survey. More than half of these individuals (339,267) are of working age, generally defined as between the ages of 18 and 64. This constitutes almost 10% of the state's total working age population. Of this number, 142,285 individuals are employed and an additional 15,057 reported being unemployed (are actively seeking work). This results in a 10.6% unemployment rate within this group – a rate that is more than 3.2 times the state average over the same time period. That leaves 181,925 individuals unattached to the labor force. The common disabilities for those not in the labor force are ambulatory (105,978), cognitive (92,488), and those that lead to independent living difficulties (86,997). These figures result in a 53.6% labor force participation rate for the disabled population, significantly smaller than Wisconsin's rate of 80.6% for the 18 to 64 age group.

*Veterans:* Wisconsin's veteran population is a recognized priority in the provision of workforce development services. There are more than 145,000 veterans of working age (between 18 and 64) in Wisconsin, representing another vital potential workforce resource.

The state's age 18 to 64 veteran population has a labor force participation rate that is slightly lower than the state as a whole (2.7 percentage points). The unemployment rate of veterans is higher than that of the overall population (3.8% compared to 3.5% - 2017 American Community Survey). Thirty percent of veterans experience some type of disability, a rate that is roughly twice that of the non-veteran population.

*Incarcerated Population:* A third notable group that faces barriers to employment in Wisconsin is its incarcerated population. Over 23,500 inmates were under the custody of the Wisconsin Department of Corrections (DOC) as of December 31, 2017. Ninety-three percent of this

population is male. Sixty-four percent of this population currently has less than five years of prison time remaining. Sixty-eight percent of the male population and 74% of the female population have only a high school education.

*Low Income Individuals:* Another group that is a priority in Wisconsin is individuals who are between the ages of 18 to 64 who are living in poverty. In 2017, about 640,000 people in Wisconsin lived in poverty, compared to about 570,000 in 2008 – an increase of about 70,000 people living in poverty. In Wisconsin, the share of people ages 18 to 64 who live in poverty is 10.8%. This means there are up to 380,000 low income job seekers and workers who may benefit from the programs and services provided by the public workforce system.

The four groups discussed represent populations that can help combat Wisconsin's workforce quantity challenge. Programs discussed in this report are needed to give these groups' individuals the training and support required to allow them to productively enter the state's labor force.

Workforce Constraints Limit Growth

Wisconsin's employment growth is constrained by difficulty finding workers to fill openings. Employers statewide have expressed concerns about the lack of qualified workforce to fill open positions. Employers in most industries and occupations voiced concerns about the lack of workforce available.

Quantity Challenge

Wisconsin's demographics are evolving. Wisconsin's age 18+ population is projected to increase by over 760,000 from 2010 to 2040. However, almost all (99%) of that increase is in the 65+ population. While the age 18+ population grows, the active workforce itself will decrease.

## The State's Workforce Development Activities

Wisconsin has 11 workforce development areas. Each area has a local workforce development board (WDB) charged with providing local guidance and implementing workforce programs within its area. The state also has two planning regions.

Wisconsin has 57 job centers across the state. The job centers are overseen at the state level by the Department of Workforce Development and are managed at the local level by the local WDBs. Local WDBs are responsible for procuring a one-stop operator for the daily operation of their perspective center(s) in accordance with WIOA 121(d). The local WDBs carry out workforce activities by partnering locally though Memorandums of Understanding (MOU) to implement core and partner programs. In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (CTE) (Perkins), Community Services Block Grant, Indian and Native American programs, U.S.

Department of Housing and Urban Development Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs Program (NFJP), Senior Community Service Employment program, Trade Adjustment Assistance (TAA) programs, Unemployment Compensation programs, and Youth-Build. TANF is not a required partner program at this time in Wisconsin.

Under WIOA, workforce development activities are categorized within several areas – Career Services, Training Services, and Business Services. A description of each is provided below.

Career Services: WIOA has 13 required elements for career services, all which support customers making informed decisions about their career choices and understanding the resources needed and available to assist them with pursuing their goals.

Over the last couple of years, DWD has made significant strides in modernizing the way participants engage and interact with the public workforce development system. The result of the modernization efforts has been the implementation of a case management application (referred to as "CEPT") that interfaces with several online tools that participants may access through the My JCW portal on jobcenterofwisconsin.com.

Training Services: Under WIOA, the public workforce development system's approach to training services places a greater emphasis on work-based learning, stackable credentials, and career pathways. All core programs participate in training services to the extent allowed by federal rules and regulations. Title I supports education and training for adults, dislocated workers, and youth. Title IV supports individuals with disabilities. Title II supports a diverse population with basic skills attainment and preparation for postsecondary education. Title III, which does not have funds for training services, is often the first point of contact for customers, serving as a hub in the referral process. Title IV works with individuals with disabilities and provides a wide variety of training to eligible consumers when necessary and appropriate to achieve their employment goal. Training can include: on the job training, work experiences, short-term training programs, and postsecondary education, etc.

Business Services: Wisconsin's Business Services Teams (BST) coordinate activities and resources with WIOA core and Combined State Plan programs to provide comprehensive, high-quality, customer-centered services to employers. The core programs and Combined State Plan partners meet regularly and collaborate to ensure that employers receive the best services available to them. BSTs provide services that include, but are not limited to: recruitment, human resources consultation, workforce incentive information and resources, training programs, tailored labor market information, and access to a the labor pool.

**The Strengths and Weaknesses of Workforce Development Activities**

Strengths

- *Collaboration:* Strengths identified include the successful partners and programs that exist and can be leveraged, both at the state and local levels. The extensive collaboration that has grown since WIOA enactment serves as a foundation for continued partnerships.
- *Education System:* Wisconsin's Technical College System has seen tremendous success in expanded career pathways, increased integrated education and training opportunities, and increased performance in Adult Education and Family Literacy.
- *Alignment with Economic Development:* The Wisconsin Technical College System (WTCS) mission is to deliver skills and training that recognizes and responds to the rapidly changing educational needs of residents to keep current with the demands of the workplace.
- *Partnerships with K-12:* Twenty-five percent of DVR's customers are high school students. DVR works closely with the K-12 system to provide integrated services to students. A DVR Counselor is assigned to every high school in Wisconsin and meets with students at the school in most cases.

<u>Weaknesses</u>

- *Training Inequity:* Clients of color are disproportionately enrolled in training programs that will have them earning less than $26,000, while their counterparts are disproportionately enrolled in higher-paying programs with an average expected salary exceeding $56,000 (WTCS Systemwide Equity Report 2018).
- *Common Language:* The public workforce system is fragmented and lacks a consistent language to communicate its services to both jobseekers and employers. An analysis of the workforce development system by the Wisconsin Policy Forum showed that in 2017, eight state agencies administered 38 programs that provided employment and training services.
- *Professional Development:* Workforce system staff would benefit from increased knowledge of partner programs. Field research conducted by the Integrated Service Delivery workgroup showed that staff would benefit from standard training on partner programs. This would increase knowledge of partner programs and create a more inclusive system.
- *Sharing Programmatic and Performance Information:* Analysis of the current workforce development system, including mandatory and optional job center partners suggests a weakness in terms of sharing programmatic and performance information.

**State Workforce Development Capacity**

Five of the state's six core programs are housed in a single state agency allowing for optimum coordination in planning and operations. Wisconsin's local WDBs and their partners have all strived to find innovative methods of serving participants and employers in local and regional workforce development ecosystems.

The local WDBs conduct customer service surveys to help ensure that they are continuously improving their services. The best practices that exist around the state provide great opportunity to increase our capacity for serving those who can benefit significantly from our training and education programs.

In 2019, DWD received a grant from the U.S. Department of Labor to expand and enhance Wisconsin's Workforce Data Integration System (WDIS) and create a Longitudinal Data Warehouse (LDW). The improved WDIS and corresponding governance will allow DWD to efficiently identify services that lead to successful outcomes for participants.

DWD's Bureau of Workforce Information and Technical Support (BWITS) regularly collaborates with local WDBs, DWD staff, and other key stakeholders to provide data and analysis for program planning and evaluation. BWITS recently updated its web-based tools and website (Wisconomy). BWITS is also responsible for developing 10-year projections of statewide and regional occupational employment and wages, job vacancies, and employment trends. Regional economists regularly work with local WDBs and other stakeholders to provide data and analysis on sector strategies, program planning, and evaluation.

**State Strategic Vision and Goals**

*Vision:* We will deliver a results-driven workforce development system providing the opportunity for Wisconsin's current and future workforce and businesses to sustain economic viability for individual and family self-sufficiency.

***Goal 1: Access:*** *Establish a customer-centric focus to increase coordination, effectiveness, and access to workforce development programs.*

Wisconsin aims to create a workforce development system that is fully accessible to any eligible person both physically and programmatically. An objective of this goal is the concept of "no wrong door" within the one-stop system, meaning that an individual seeking assistance will be welcomed at any point of intake. Both employers and job seekers will be able access services through a seamless system. The "no wrong door" concept ensures that individuals with barriers to employment per WIOA Section 3are not routed prematurely to a particular program without informed customer choice and an accurate assessment of how they might be best served.

***Goal 2: Alignment:*** *Engage partner staff to increase system alignment.*

Through focus groups conducted during the previous State Plan period it was clear that strong collaboration and coordination happens at the local level. However, the public workforce system needs to engage staff from all partners, including new Combined State Plan partners FSET, TANF, and Reentry, in alignment efforts at both the state and local levels. This includes cross-education on all programs for all staff. The WIOA Integrated Service Delivery Communications workgroup has been developing training and materials that will be available to all WIOA partner staff.

***Goal 3: Accountability:*** *Facilitate meaningful outcomes through alignment of governance, accountability, and metrics.*

Improvement within the workforce development system is often stifled by a lack of shared governance. A cross-functional work-group of state and local staff has been created to develop WIOA data governance. Wisconsin's WIOA programs will have successful outcomes as defined by the WIOA primary indicators of performance. The state workforce development board will review federal performance outcomes. The state will also look at metrics beyond the WIOA common measures to achieve Wisconsin's vision of ensuring that all residents have access to high-wage, high-skill education and training for in-demand occupations to maintain economic self-sufficiency.

**Assessment**

Wisconsin's core WIOA programs will assess its overall effectiveness using the WIOA Primary Indicators of Performance. At a macro-level, the indicators of performance provide an initial indication of the state workforce system's effectiveness at achieving WIOA's federal vision and goals. The state has developed a joint dashboard of the primary indicators of performance and display on its WIOA Performance SharePoint site. Core and partner programs will assess its performance based on the adjusted levels of performance. Areas of strength and improvement may be distinguished by reviewing current performance and performance trends. Program managers, at all levels, will use these monthly assessments to further target assessments to determine root causes for strong and weak performance. WIOA performance results are reviewed at CWI meetings.

**State Strategy**

*Increased Collaboration and Program Alignment*

Wisconsin recognizes the need for increased collaboration and program alignment between the Core and Combined State Plan program partners. As such, Wisconsin has three new State Plan partners – the Departments of Health Services, Children and Families, and Corrections.

The concept of "no wrong door" within our job centers will ensure that all individuals are not routed to a particular program without informed customer choice and an accurate assessment of service needs. Through the assessment process, career exploration staff will be able to meet the needs of the customers by coordinating services and leveraging resources that best serve individuals, including those with barriers to employment.

*Using Labor Market Information to Promote Sector-Based Training*

Sector strategies, regional, industry-focused approaches to building skilled workforces are an effective means of aligning public and private resources to address the workforce needs of employers. Accurate and current labor market data and guidance about career and education opportunities assists individuals in making better decisions about education that can lead to better outcomes and support policy and program planning.

*Increasing Knowledge of and Access to Career Pathways*

In order to collaborate successfully across agencies, systems, and customer, we will provide guidance, align practices between stakeholders, including business and industry partners, and engage in information sharing as allowed. We will build on our career pathways foundation by continuing to coordinate learning and professional development for system, partner agencies and training of staff. We have found that our business partners are not always familiar with career pathways. Over the next four years, we will work to leverage the state's sector partnerships to understand the number of industry-recognized credentials and identify the business community's awareness of them. Guidance and support will be provided statewide and at the agency level by the Wisconsin Career Pathways Committee.

*Expand Opportunities for Work-Based Learning and Credential Attainment*

Wisconsin will expand work-based learning opportunities for adults and youth. The state will focus on serving a diverse community of job seekers, including veterans, returning citizens, low income individuals, individuals with disabilities, and those seeking employment in non-traditional occupations. Wisconsin will focus on expanding its registered apprenticeship program and increase collaboration with Combined State Plan partners.

Wisconsin will expand integrated work-readiness programs and work-based learning opportunities, such as On-the-Job Trainings. In addition to focusing on work-based learning programs, Wisconsin will promote training strategies that lead to credential attainment in demand-driven sectors.

*Use Technology Solutions that Increase Collaboration and Innovation*

*The state will expand and enhance Wisconsin's Workforce Data Integration System, which includes improving data governance and required infrastructure to streamline and improve the ability to connect data between workforce programs. It will result in the ability to match individualized data records between workforce program data systems, establishment of the governance and processes for the system to receive and process evidence building activities requests, including program evaluations and research studies. The creation of data dictionaries standards and technical data documentation standards will ensure the data is trusted and of high quality. By improving the Workforce Data Integration System, the public workforce system will be able to more efficiently deliver services leading to successful outcomes for participants while enhancing the scope and quality of workforce programs evaluations and other evidence building activities.*

In addition, to enable DWD to operate and execute its mission, the agency will facilitate the modernization of legacy applications to improve service to job seekers and businesses. To accomplish the WIOA goal of "common intake," Wisconsin has procured a tool that matches individual records between different data systems. This tool will be used for specific data sharing between participating partners. The matching tool will reduce the number of duplicated records, created through human error, in the WIOA program's management information system to maximize data quality. The WIOA programs will identify reliable data sources from third parties to automate collection of required data elements to reduce customer and staff burden.

**Implementation of State Strategy**

The Governor's Executive Order 152 directs state agencies to collaborate with the Governor's Council on Workforce Investment (Council or CWI) and the Wisconsin Job Center system to develop a strong, skilled workforce. Memoranda of Understanding (MOU) formalizes multi-agency collaboration between the Council, DWD, and the Wisconsin Workforce Development Association (WWDA); as well as between DWD, Wisconsin Technical College System (WTCS), and the Wisconsin Economic Development Corporation (WEDC); and between DWD and the Department of Public Instruction (DPI)..

Department of Health Services (DHS) will consult with DWD, the WWDA, and other WIOA partners to inform regional FoodShare Employment and Training (FSET) vendors of statewide and local employer needs to assist in the development of regionally provided education, training, and work experience activities.

Department of Children and Families (DCF) will work with DWD and other WIOA partners to strengthen local collaboration and partnerships to ensure all Wisconsin residents have equal access to programs and services that will allow them to fully participate in the labor force. DCF will provide CWI and the other WIOA partners information and guidance on DCF programs, activities, and services to low-income parents, at-risk youth, refugees, and childcare recipients and providers.

The WIOA Leadership Team functionalizes the collaborative activities and maintains several cross-agency teams that work on WIOA details. With the implementation of WIOA, specific strategies have been utilized to align the work of core and required partners at both the state and local level. Leadership from the one-stop partner programs comes together monthly as an Implementation Team to provide guidance on the work and make commitments to specific actions necessary for moving forward. MOUs between agencies will be implemented as needed to support the alignment of efforts and activities.

**Alignment with Activities outside the Plan**

In September 2016, Wisconsin's educational entities signed a memorandum of understanding that reinforces the role of career and technical education and career pathways among the state's educational entities.

Another significant state-supported workforce development activity includes the development and expansion of career pathways. At the secondary level, efforts have focused on developing state-endorsed regional career pathways made possible by the JPMorgan Chase New Skills for Youth (NSFY) grant. The primary focus beginning in the 2019-20 school year is to expand the development and implementation of career pathways (which are currently offered in four pilot regions) that begin at the secondary level and progress to postsecondary education and career opportunities. The NSFY regional career pathway development process ensures that high

schools connect to regional workforce and economic development efforts where career pathways feature high-skill, in-demand careers. These pathways are created in partnership with local workforce and economic development boards, technical colleges, and other regional stakeholders to provide school districts with a "ready-made" academic and career plan that includes:

- A sequence of courses;
- Work-based learning experiences;
- Industry-recognized certifications; and
- Opportunities to gain college credit.

At the postsecondary level, Wisconsin's technical colleges continue to work closely with employer, industry, and workforce development partners to ensure that programs are aligned directly with workforce needs and skills. Programs are developed and reviewed based on extensive labor market research and expertise from program advisory committees. Advisory committees consist of experts in the occupational field and local businesses to keep the program skills, competencies, and training updated with current and future needs (e.g., keeping pace with changing technologies and industry standards). WTCS also engages with the Wisconsin Department of Workforce Development (DWD) to deliver apprenticeship programs in high-demand, high-wage, and high-skill industry sectors.

DWD is organizationally positioned to strengthen the WIOA partnership with Registered Apprenticeship. This partnership is aligned at the state level with Registered Apprenticeship participating in the development, review, and discussion of statewide WIOA policies. At the local level, Bureau of Apprenticeship Standards (BAS) local staff and Apprenticeship Training Representatives (ATRs) are partnering with local WDBs.

The local WDBs sector planning and industry engagement alliances will be an important link in expansion of apprenticeship in new occupational areas. The ATRs have been invited to the Employer Alliance meetings, as appropriate. ATRs provide training to local Job Center staff regarding apprenticeship and provide materials that job seekers may use to gauge their interest in apprenticeable occupations.

**Coordinating with Economic Development Strategies**

DWD continues to work closely with the Wisconsin Economic Development Corporation to attract military veterans and their spouses to consider moving to and working in Wisconsin when exiting the military. DWD and WEDC staff attend military summits at bases throughout the country to advise customers of the great benefits afforded to veterans who choose to live and work in Wisconsin. DWD has also been working with WEDC on military spouse hiring initiatives to raise awareness of the value/workforce the spouses bring for employers.

DWD works closely with WEDC on their Think-Make-Happen/In Wisconsin initiative, and have collaborated with them to provide job opening information through a web service so WEDC can help promote our business customer needs through their website and local searching mechanisms.

Locally, all 11 WDBs coordinate with economic development entities to support strategies and activities. Due to boundary lines that do not perfectly match those of the local WDAs, Wisconsin WDBs have become adept at working with multiple economic development entities and serve as a resource to these organizations.

# II. STRATEGIC ELEMENTS

## A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

### 1. ECONOMIC AND WORKFORCE ANALYSIS

Wisconsin's economy continued to grow in 2018, as shown by an increase in real gross domestic product (GDP) from 2017 to 2018. The state's employment-to-population ratio exceeds that of the U.S., and Wisconsin's unemployment rate has declined from 3.1% in May of 2018 to 2.8% in May of 2019.

The real story in Wisconsin is not of industry job growth or occupational demand; rather, it is one of labor force and workforce constraints. There is existing demand for workers in almost every industry, occupation, and geography. On one hand, there is a quantity challenge as Wisconsin's workforce does not have enough workers to fill existing jobs. On the other hand, there is a quality challenge as the existing workforce needs training to increase and update workers' skills. Slowing population growth, retiring Baby Boomers, and attractiveness to place or location are changing the workforce landscape.

Wisconsin's population growth from natural increase is predicted to steadily slow after 2020, as the birth-to-death ratio goes from 1.45 (over the period 2010 to 2020) to 1.16 (2030 - 2040). Net migration is projected to provide minimal increases. Moreover, the state's population is aging. The percentage of Wisconsin's population 65 years and older was 13.7% in 2010. That percentage increases to 23.7% in 2040, almost doubling in number. Meanwhile, the percentage of the working age population (18 -64) goes from 62.8% in 2010 to 55.1% in 2040.

Following is an overview of the economic and workforce situation in Wisconsin. This plan describes how the strategic programs being developed will help meet the state's employers' quantity and quality requirements.

<u>Job Growth</u>

Many industries, occupations, and geographies continue to register job growth in this expansion. From 2017 to 2018 in Wisconsin, the latest year-over-year data available:

- Total jobs as based on Quarterly Census of Employment and Wages (QCEW) data increased by almost 26,000 or 0.9%.
- Private sector jobs increased by over 24,400 (1.0%).
- Construction saw an increase of over 5,100 jobs (4.3%).

- Manufacturing added over 8,900 jobs, with the strongest performers being Food (+1,745 jobs), Machinery (+1,975 jobs), and Fabricated Metal Product Manufacturing (+2,707 jobs).
- The Healthcare sector added over 5,000 jobs (1.2%), with the greatest increase coming in Ambulatory Healthcare Services.
- Merchant Wholesalers (up 4,133), Specialty Trade Contractors (up 3,216), and Professional, Scientific, and Technical Services (up 3,185) were the strongest performing industry subsectors.

There is existing demand for jobs in most industries, occupations, and geographies. In fact, it is the supply side of the equation that is holding back increased economic growth in the state. Job openings are posted across the spectrum of skill levels: physicians, skilled trades, information technology, welders, computerized numeric control operators, and assemblers. The economic and workforce analysis of the state has shifted from one of which industries are growing to one of how to find, train, and attract enough workers. The focus of Wisconsin's workforce development strategy must incorporate quantity.

Industry sectors and occupations for which there is existing demand fill the industry and occupational landscape. The fastest growing industries and occupations are in construction, healthcare, IT, professional business services, and leisure and hospitality, Table 1. However, nearly all industries are advertising for help. Many employers are complaining about difficulty finding applicants, the skills possessed the available applicants, and job turnover.

**Table 1: Wisconsin Long Term Industry Employment Projections, 2016-2026**

| Industry | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) |
|---|---|---|---|---|
| **Total All Industries** | **3,110,476** | **3,320,654** | **210,178** | **6.76%** |
| **Goods Producing** | **622,648** | **644,532** | **21,884** | **3.51%** |
| Natural Resources and Mining | 47,486 | 51,095 | 3,249 | 6.79% |
| Construction | 112,059 | 122,729 | 10,670 | 9.52% |
| Manufacturing | 462,743 | 470,708 | 7,965 | 1.72% |
| **Services Providing** | **2,335,236** | **2,501,792** | **166,556** | **7.13%** |
| Trade, Transportation, and Utilities | 549,574 | 574,464 | 24,890 | 4.53% |
| Information | 48,870 | 47,858 | -1,012 | -2.07% |
| Financial Activities | 151,542 | 159,855 | 8.313 | 5.49% |
| Professional and Business Services | 321,277 | 359,022 | 37,725 | 11.74% |

| Industry | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) |
|---|---|---|---|---|
| Education and Health Services | 656,110 | 709,463 | 53,353 | 8.13% |
| Leisure and Hospitality | 280,570 | 310,801 | 30,231 | 10.77% |
| Other Services (except Government) | 153,517 | 162,200 | 8,683 | 5.65% |
| Government | 173,776 | 178,149 | 4,373 | 2.52% |

**(1) Employment** is a count of jobs rather than people, and includes all part- and full-time nonfarm jobs. Employment also includes jobs among self-employed and unpaid family workers.

*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

Emerging demand industry sectors and occupations are more difficult to address because of the lack of established classification. For example, Wisconsin has a growing biotechnology sector that is difficult to capture in the present North American Industrial Classification System (NAICS) coding structure. Occupationally, a bioinformatics analyst can span healthcare records, medical engineering, water resources development, carbon footprint assessment, etc.

Table 2: Wisconsin Long Term Occupational Employment Projections, 2016-2026

| Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Employment Change (2016-2026) | Percent Change (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Annual 25th Percentile | Annual 50th Percentile (Median) | Annual 75th Percentile |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 000000 | Total, All Occupations | 3,110,476 | 3,320,654 | 210,178 | 6.76% | 150,259 | 202,821 | 21,018 | 374,098 | $24,300.00 | $36,250.00 | $55,260.00 |
| 110000 | Management Occupations | 183,648 | 203,862 | 20,214 | 11.01% | 5,858 | 8,060 | 2,021 | 16,039 | $64,330.00 | $92,000.00 | $125,530.00 |
| 130000 | Business and Financial Operations Occupations | 154,142 | 170,323 | 16,181 | 10.50% | 4,720 | 9,648 | 1,618 | 15,986 | $44,440.00 | $58,160.00 | $75,530.00 |
| 150000 | Computer and Mathematical Occupations | 75,762 | 86,700 | 10,938 | 14.44% | 1,339 | 3,862 | 1,094 | 6,295 | $52,860.00 | $70,030.00 | $89,750.00 |
| 170000 | Architecture and Engineering Occupations | 52,977 | 59,246 | 6,269 | 11.83% | 1,394 | 2,551 | 627 | 4,572 | $52,230.00 | $66,370.00 | $83,010.00 |
| 190000 | Life, Physical, and Social Science Occupations | 21,644 | 24,279 | 2,635 | 12.17% | 600 | 1,425 | 264 | 2,289 | $41,180.00 | $55,760.00 | $74,260.00 |
| 210000 | Community and Social Service Occupations | 43,138 | 48,378 | 5,240 | 12.15% | 1,833 | 3,091 | 524 | 5,448 | $29,690.00 | $40,600.00 | $53,260.00 |
| 230000 | Legal Occupations | 15,874 | 16,761 | 887 | 5.59% | 408 | 609 | 89 | 1,100 | $44,440.00 | $59,760.00 | $101,380.00 |
| 250000 | Education, Training, and Library Occupations | 188,431 | 197,633 | 9,202 | 4.88% | 8,270 | 8,029 | 920 | 17,219 | $29,930.00 | $45,480.00 | $62,640.00 |
| 270000 | Arts, Design, Entertainment, Sports, and Media Occupations | 51,752 | 55,620 | 3,868 | 7.47% | 2,162 | 3,133 | 387 | 5,682 | $26,930.00 | $39,640.00 | $55,950.00 |
| 290000 | Healthcare Practitioners and Technical Occupations | 166,815 | 181,631 | 14,816 | 8.88% | 4,597 | 4,477 | 1,482 | 10,556 | $45,720.00 | $62,080.00 | $80,600.00 |
| 310000 | Healthcare Support Occupations | 75,222 | 83,305 | 8,083 | 10.75% | 4,487 | 4,334 | 808 | 9,629 | $24,970.00 | $29,970.00 | $36,460.00 |
| 330000 | Protective Service Occupations | 56,925 | 58,535 | 1,590 | 2.79% | 3,014 | 3,220 | 159 | 6,393 | $24,550.00 | $38,190.00 | $56,810.00 |
| 350000 | Food Preparation and Serving Related Occupations | 246,090 | 272,423 | 26,333 | 10.70% | 19,106 | 24,833 | 2,633 | 46,572 | $17,440.00 | $19,290.00 | $23,840.00 |
| 370000 | Building and Grounds Cleaning and Maintenance Occupations | 97,738 | 104,193 | 6,455 | 6.60% | 6,191 | 6,393 | 646 | 13,230 | $19,640.00 | $23,880.00 | $30,930.00 |
| 390000 | Personal Care and Service Occupations | 155,414 | 182,893 | 27,479 | 17.68% | 12,728 | 11,923 | 2,748 | 27,399 | $19,370.00 | $22,580.00 | $26,530.00 |
| 410000 | Sales and Related Occupations | 290,232 | 305,035 | 14,803 | 5.10% | 17,125 | 22,901 | 1,480 | 41,506 | $19,130.00 | $26,470.00 | $46,950.00 |
| 430000 | Office and Administrative Support Occupations | 438,829 | 441,870 | 3,041 | 0.69% | 22,835 | 26,665 | 304 | 49,804 | $25,950.00 | $33,840.00 | $42,870.00 |
| 450000 | Farming, Fishing, and Forestry Occupations | 29,827 | 31,615 | 1,788 | 5.99% | 1,125 | 3,446 | 179 | 4,750 | $24,630.00 | $30,760.00 | $39,170.00 |
| 470000 | Construction and Extraction Occupations | 114,077 | 124,061 | 9,984 | 8.75% | 4,186 | 7,720 | 998 | 12,904 | $36,600.00 | $48,610.00 | $64,930.00 |
| 490000 | Installation, Maintenance, and Repair Occupations | 112,840 | 119,759 | 6,919 | 6.13% | 4,106 | 6,769 | 692 | 11,567 | $33,290.00 | $43,580.00 | $55,960.00 |
| 510000 | Production Occupations | 318,101 | 316,285 | -1,816 | -0.57% | 12,821 | 22,619 | -182 | 35,258 | $27,370.00 | $35,280.00 | $45,400.00 |
| 530000 | Transportation and Material Moving Occupations | 220,998 | 236,267 | 15,269 | 6.91% | 11,299 | 16,219 | 1,527 | 29,039 | $24,680.00 | $32,780.00 | $42,160.00 |

Table 2

**(1) Employment** Count of jobs rather than people, and includes all part- and full-time nonfarm jobs. Employment also includes jobs among self-employed. Totals may not add due to suppression.

**(2) Exits.** Workers who leave the labor force entirely.

**(3) Transfers.** Workers who leave their occupation for a different occupation.

**(4) Total Openings.** Includes exits, transfers and growth.

*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

Long Term Occupational Employment Projections (Table 2) show employment needs include health care informatics, robotics, business services surrounding large databases and quantitative expertise, and IT systems design and programming. Some employers have concerns about their inability to find and keep skilled and unskilled workers. While manufacturing employment growth is limited, the shift in occupations and skills is toward automation. The common element in these growing fields is the need for people with IT knowledge and application, whether it be medical records, accounting software, CNC programming or logistic operations.

Businesses are demanding worker skills in three general areas:

- Technical skills,
- Soft skills, and
- Employability skills.

These skill sets overlap, despite their operational specificity. For example, technical skills entail computer use, blueprint literacy, and basic math and language skills. Soft skills include listening, conflict resolution, and teamwork. Perhaps most frustrating for many businesses are the lack of sufficient scope of employability skills ("soft skills"),e.g., showing up on time, daily attendance, safety, and discretion.

The top 50 fastest growing occupational projections are listed in Table 3 below, which includes typical education for entry and related occupation work.

typical education for entry and related occupation work.

**Table 3: Wisconsin Long Term Occupational Employment Projections with Typical Education for Entry, 2016-2026**

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 172011 | Aerospace Engineers | 81 | 131 | 50 | 61.73% | 2 | 4 | 5 | 11 | Bachelor's Degree | None |
| 2 | 152041 | Statisticians | 321 | 460 | 139 | 43.30% | 8 | 20 | 14 | 42 | Master's Degree | None |
| 3 | 412012 | Gaming Change Persons | 515 | 707 | 192 | 37.28% | 57 | 56 | 19 | 132 | No formal educational | None |

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | and Booth Cashiers | | | | | | | | | credential | |
| 4 | 391012 | Slot Supervisors | 147 | 200 | 53 | 36.05% | 8 | 18 | 5 | 31 | High school diploma or equivalent | Less than 5 years |
| 5 | 291131 | Veterinarians | 1,803 | 2,423 | 620 | 34.39% | 40 | 34 | 62 | 136 | Doctoral or professional degree | None |
| 6 | 292056 | Veterinary Technologists and Technicians | 2,033 | 2,732 | 699 | 34.38% | 77 | 106 | 70 | 253 | Associate's degree | None |
| 7 | 391011 | Gaming Supervisors | 321 | 429 | 108 | 33.64% | 18 | 40 | 11 | 69 | High school diploma or equivalent | Less than 5 years |
| 8 | 475011 | Derrick Operators, Oil and Gas | 3 | 4 | 1 | 33.33% | 0 | 0 | 0 | 0 | No formal educational credential | None |
| 9 | 319096 | Veterinary Assistants and Laborator | 1,516 | 2,008 | 492 | 32.45% | 102 | 165 | 49 | 316 | High school diploma or | None |

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | y Animal Caretakers | | | | | | | | | equivalent | |
| 10 | 151132 | Software Developers, Applications | 11,982 | 15,776 | 3,794 | 31.66% | 190 | 682 | 379 | 1,251 | Bachelor's degree | None |
| 11 | 152031 | Operations Research Analysts | 1,768 | 2,303 | 535 | 30.26% | 42 | 77 | 54 | 173 | Bachelor's degree | None |
| 12 | 399021 | Personal Care Aides | 64,243 | 83,335 | 19,092 | 29.72% | 5,889 | 4,436 | 1,909 | 12,234 | High school diploma or equivalent | None |
| 13 | 311011 | Home Health Aides | 7,515 | 9,737 | 2,222 | 29.57% | 524 | 436 | 222 | 1,182 | High school diploma or equivalent | None |
| 14 | 291071 | Physician Assistants | 1,691 | 2,185 | 494 | 29.21% | 34 | 69 | 49 | 152 | Master's degree | None |
| 15 | 291171 | Nurse Practitioners | 2,288 | 2,900 | 612 | 26.75% | 50 | 74 | 61 | 185 | Master's degree | None |
| 16 | 131161 | Market Research Analysts and Marketing Specialists | 12,118 | 15,113 | 2,995 | 24.72% | 361 | 934 | 300 | 1,595 | Bachelor's degree | None |

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 17 | 493091 | Bicycle Repairers | 391 | 487 | 96 | 24.55% | 16 | 38 | 10 | 64 | High school diploma or equivalent | None |
| 18 | 191021 | Biochemists and Biophysicists | 586 | 726 | 140 | 23.89% | 13 | 42 | 14 | 69 | Doctoral or professional degree | None |
| 19 | 392021 | Nonfarm Animal Caretakers | 4,959 | 6,131 | 1,172 | 23.63% | 379 | 447 | 117 | 943 | High school diploma or equivalent | None |
| 20 | 172071 | Electrical Engineers | 4,601 | 5,678 | 1,077 | 23.41% | 116 | 206 | 108 | 430 | Bachelor's degree | None |
| 21 | 113031 | Financial Managers | 9,706 | 11,919 | 2,213 | 22.80% | 249 | 535 | 221 | 1,005 | Bachelor's degree | 5 years or more |
| 22 | 512022 | Electrical and Electronic Equipment Assemblers | 7,967 | 9,780 | 1,813 | 22.76% | 450 | 580 | 181 | 1,211 | High school diploma or equivalent | None |
| 23 | 211013 | Marriage and Family Therapists | 1,004 | 1,232 | 228 | 22.71% | 41 | 73 | 23 | 137 | Master's degree | None |

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 24 | 172041 | Chemical Engineers | 630 | 773 | 143 | 22.70% | 15 | 29 | 14 | 58 | Bachelor's degree | None |
| 25 | 132052 | Personal Financial Advisors | 5,372 | 6,591 | 1,219 | 22.69% | 147 | 293 | 122 | 562 | Bachelor's degree | None |
| 26 | 211011 | Substance Abuse and Behavioral Disorder Counselors | 1,594 | 1,952 | 358 | 22.46% | 65 | 116 | 36 | 217 | Bachelor's degree | None |
| 27 | 193041 | Sociologists | 272 | 332 | 60 | 22.06% | 9 | 18 | 6 | 33 | Master's degree | None |
| 28 | 419021 | Real Estate Brokers | 688 | 839 | 151 | 21.95% | 39 | 30 | 15 | 84 | High school diploma or equivalent | Less than 5 years |
| 29 | 152011 | Actuaries | 650 | 791 | 141 | 21.69% | 9 | 34 | 14 | 57 | Bachelor's degree | None |
| 30 | 173026 | Industrial Engineering Technicians | 1,754 | 2,132 | 378 | 21.55% | 62 | 102 | 38 | 202 | Associate's degree | None |
| 31 | 192031 | Chemists | 2,362 | 2,869 | 507 | 21.46 | 66 | 164 | 51 | 281 | Bachelor's degree | None |
| 32 | 291129 | Therapists, All Other | 953 | 1,157 | 204 | 21.41% | 25 | 31 | 20 | 76 | Bachelor's degree | None |

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 33 | 312022 | Physical Therapist Aides | 402 | 487 | 85 | 21.14% | 20 | 33 | 8 | 61 | High school diploma or equivalent | 5 years or more |
| 34 | 251071 | Health Specialties Teachers, Postsecondary | 6,080 | 7,328 | 1,248 | 20.53% | 246 | 256 | 125 | 627 | Doctoral or professional degree | Less than 5 years |
| 35 | 533041 | Taxi Drivers and Chauffeurs | 7,837 | 9,439 | 1,602 | 20.44% | 513 | 349 | 160 | 1,022 | No formal educational credential | None |
| 36 | 419012 | Models | 108 | 130 | 22 | 20.37% | 12 | 8 | 2 | 22 | No formal educational credential | None |
| 37 | 273099 | Media and Communication Workers, All Other | 123 | 148 | 25 | 20.33% | 6 | 6 | 2 | 14 | High school diploma or equivalent | None |
| 38 | 211014 | Mental Health Counselors | 2,746 | 3,302 | 556 | 20.25% | 111 | 198 | 56 | 365 | Master's degree | None |
| 39 | 193031 | Anthropologists and | 104 | 125 | 21 | 20.19% | 3 | 7 | 2 | 12 | Master's degree | None |

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Archeologists | | | | | | | | | | |
| 40 | 519141 | Semiconductor Processors | 10 | 12 | 2 | 20.00% | 0 | 1 | 0 | 1 | High school diploma or equivalent | None |
| 41 | 319092 | Medical Assistants | 11,530 | 13,792 | 2,262 | 19.62% | 556 | 778 | 226 | 1,560 | Postsecondary non-degree award | None |
| 42 | 273091 | Interpreters and Translators | 1,843 | 2,202 | 359 | 19.48% | 91 | 88 | 36 | 215 | Bachelor's degree | None |
| 43 | 419099 | Sales and Related Workers, All Other | 2,134 | 2,549 | 415 | 19.45% | 124 | 179 | 42 | 345 | High school diploma or equivalent | None |
| 44 | 414011 | Sales Representatives, Wholesale and Manufacturing, Technical and Scientific Products | 4,244 | 5,068 | 824 | 19.42% | 154 | 312 | 82 | 548 | Bachelor's degree | None |

| Rank | Occupation SOC Code | Occupation SOC Title | Employment 2016 (1) | Projected Employment 2026 | Change Employment (2016-2026) | Change Percent (2016-2026) | Annual Exits (2) | Annual Transfers (3) | Annual Growth | Annual Total Openings (4) | Typical Education for Entry (5) | Related Occupation Work Experience (6) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 45 | 251072 | Nursing Instructors and Teachers, Postsecondary | 1,550 | 1,843 | 293 | 18.90% | 62 | 65 | 29 | 156 | Doctoral or professional degree | Less than 5 years |
| 46 | 472151 | Pipelayers | 408 | 485 | 77 | 18.87% | 16 | 30 | 8 | 54 | No formal educational credential | None |
| 47 | 173023 | Electrical and Electronics Engineering Technicians | 2,446 | 2,904 | 458 | 18.72% | 86 | 141 | 46 | 273 | Associate's degree | None |
| 48 | 319011 | Massage Therapists | 2,824 | 3,344 | 520 | 18.41% | 202 | 111 | 52 | 365 | Postsecondary non-degree award | None |
| 49 | 131131 | Fundraisers | 2,306 | 2,727 | 421 | 18.26% | 78 | 165 | 42 | 285 | Bachelor's degree | None |
| 50 | 353021 | Combined Food Preparation and Serving Workers, Including Fast Food | 65,257 | 77,091 | 11,834 | 18.13% | 6,302 | 6,591 | 1,183 | 14,076 | No formal educational credential | None |

**(1) Employment** Count of jobs rather than people, and includes all part- and full-time nonfarm jobs. Employment also includes jobs among self-employed. Totals may not add due to suppression.

**(2) Exits.** Workers who leave the labor force entirely.

**(3) Transfers.** Workers who leave their occupation for a different occupation.

**(4) Total Openings.** Includes exits, transfers and growth.

**(5) Typical education needed for entry** What most workers need to enter the occupation.

**(6)Related-occupation work experience.** Although work experience in a related occupation is beneficial for all occupations, this metric is meant to capture work experience that is commonly considered necessary by employers, or is a commonly accepted substitute for other, more formal types of training or education.

*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

Employment in Wisconsin continues to increase, albeit at a slow pace. The employment-to-population ratio continues to exceed the national rate. The state's labor force participation rate currently (May 2019 = 67.3%) is 4.5 percentage points higher than the national rate (May 2019 = 62.8%). Wisconsin's unemployment rate has dropped through the economic recovery to as low as 2.8% on a monthly seasonally adjusted basis.

Discussion of Wisconsin's workforce quantity challenge makes clear the need to tap into all human resources available.

**Individuals with Barriers**

WIOA defines a number of populations which may experience barriers to employment. Wisconsin recognizes that many of its residents may experience difficulty gaining and maintaining employment.

- There are 860,108 individuals who are considered low-income, as defined by earning less than 125% of the federal poverty level wage (2017 American Community Survey).
- There are 49,261 American Indians or Alaska Natives (and an additional 45,773 residents that claim some Native American heritage) in the state and an additional 1,811 Native Hawaiians or Other Pacific Islanders (2017 American Community Survey).
- There are 52,573 youth (those under age 18) in the civilian non-institutionalized population that have significant disabilities (2017 American Community Survey).
- According to Cornell University's 2017 Disability Status Report the overall percentage (prevalence rate) of working age people (ages 21 to 64) with a disability in Wisconsin was 9.6%.
- According to the same report, the overall percentage for people with a disability ages 16 to 20 in Wisconsin was 6.8%.

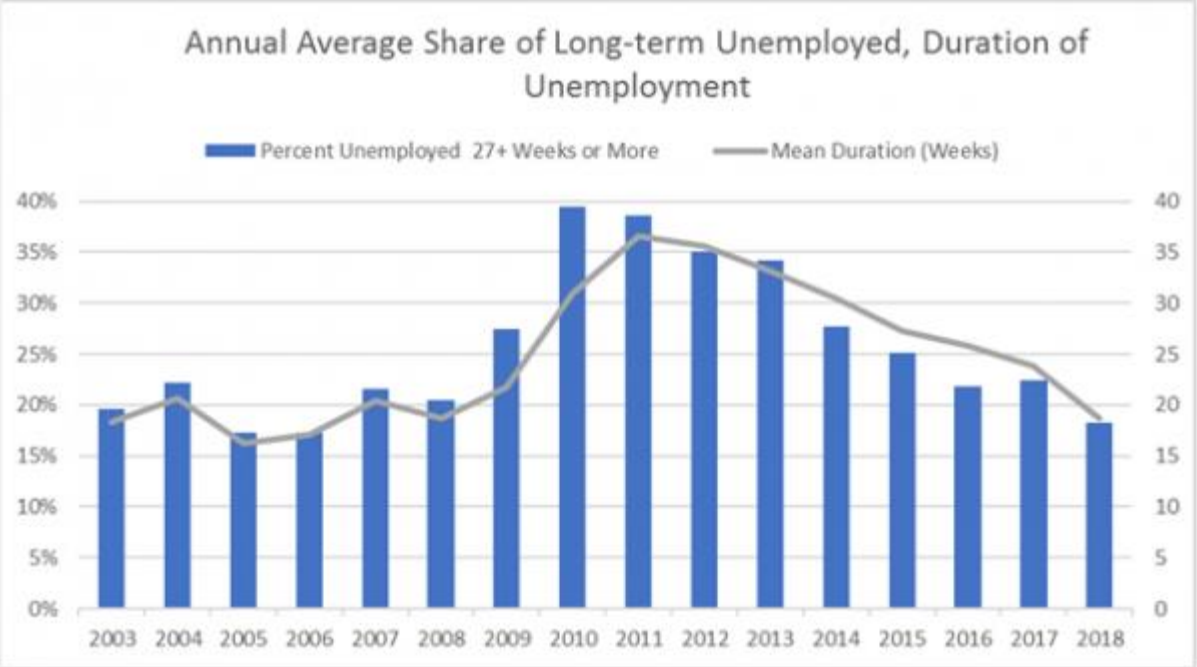
- On the average night, there are approximately 5,000 homeless individuals, with roughly half (47.4%) a part of families with minor children (Wisconsin Balance of State Continuum of Care – January 2017).
- As of December 31, 2018, 465 youth 17 years of age and older were in out-of-home care (DCF).
- 185,754 individuals in the state speak English less than "very well" (2017 American Community Survey).
- At the end of October 2019, Wisconsin had 14,886 Temporary Assistance for Needy Families (TANF)/Wisconsin Works (W-2) participants.
- According to the 2018 Migrant Labor Report, there are 4,493 migrant and seasonal farmworkers (includes dependents) in Wisconsin, as defined at section 167(i) of WIOA and Training and Employment Guidance Letter (TEGL) No. 35-14.
- In FFY 2018, the Refugee Services Program served 440 refugees in Employment and Training activities. In FFY 2019, 448 refugees were served.

***Unemployment***

In 2018, there were 92,200 unemployed people in Wisconsin. Of that total, 39,100 people were unemployed less than five weeks, 24,900 people were unemployed between 5-14 weeks, 11,400 people were unemployed between 15-26 weeks, and 16,800 people were unemployed 27 weeks or more.

Per the chart below, the average duration of unemployment peaked in 2011 at 36.6 weeks and has decreased every year since, finally reaching roughly pre-recession levels. The share of long-term unemployed also largely has decreased post-recession and continues its decline.

***Chart 1: Annual Average Share of Long-Term Unemployed***




*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

### *Characteristics of Those Not in the Labor Force*

According to the Current Population Survey, in 2018 (annual average), 1.49 million or 32.4% of the civilian, non-institutionalized population aged 16 and over did not participate in the labor market. Of this population, the large majority (95%) indicated that they did not want a job. This cohort includes 181,000 residents between the ages of 16 and 24 seemingly due to educational commitments, as well as 1,033,800 residents over the age of 55 who have largely entered into retirement. This demonstrates two key facts of labor force non-participation, namely that large numbers of age-eligible individuals have either not yet entered the active workforce or have aged out of it.

### *Status of Labor Force Subgroups*

There are a number of groups within this larger population who face more Significant Barriers to Employment (SBE) and therefore require special services such as those provided under WIOA. Among these groups are individuals with disabilities, veterans, the incarcerated population, and low income individuals.

### Individuals with Disabilities

There are 677,949 individuals in the civilian, non-institutionalized population in Wisconsin that self-identify as having a significant disability, according to the 2017 American Community Survey. More than half of these individuals (339,267) are of working age, generally defined as between the ages of 18 and 64. This constitutes almost 10% of the state's total working age population. Of this number, 142,285 individuals are employed and an additional 15,057 reported being unemployed (are actively seeking work). This results in a 10.6% unemployment rate within this group – a rate that is more than 3.2 times the state average over the same time period. That leaves 181,925 individuals unattached to the labor force. The most common

disabilities for those not in the labor force are ambulatory (105,978), cognitive (92,488), and those that lead to independent living difficulties (86,997)[1]. These figures result in a 53.6% labor force participation rate for the disabled population, significantly smaller than Wisconsin's rate of 80.6% for the 18 to 64 age group.

**Veterans**

Wisconsin's veteran population is a recognized priority in the provision of workforce development services. There are more than 145,000 veterans of working age (between 18 and 64) in Wisconsin, representing another vital potential workforce resource.

The state's age 18 to 64 veteran population has a labor force participation rate that is slightly lower than the state as a whole (2.7 percentage points). The unemployment rate of veterans is higher than that of the overall population (3.8% compared to 3.5% - 2017 American Community Survey). Thirty percent of veterans experience some type of disability, a rate that is roughly twice that of the non-veteran population.

**Incarcerated Population**

A third notable group that faces barriers to employment in Wisconsin is its incarcerated population. Over 23,500 inmates were under the custody of the DOC as of December 31, 2017. Ninety-three percent of this population is male. Sixty-four percent of this population currently has less than five years of prison time remaining. Sixty-eight percent of the male population and 74% of the female population have only a high school education.

**Low Income Individuals**

Another group that is a priority in Wisconsin consists of individuals who are between the ages of 18 and 64 living in poverty. In 2017, about 640,000 people in Wisconsin lived in poverty, compared to about 570,000 in 2008 – an increase of about 70,000 people living in poverty. In Wisconsin, the share of people ages 18 to 64 who live in poverty is 10.8%. This means there are up to 380,000 low income job seekers and workers who may benefit from the programs and services provided by the public workforce system.

The four groups discussed represent populations that can help combat Wisconsin's workforce quantity challenge. Programs discussed in this report are needed to give these groups' individuals the training and support required to allow them to productively enter the state's labor force pipeline. The state added the DCF, DHS, and DOC to the PY20-23 State Plan to increase the opportunity for economic mobility and work participation among these populations by promoting further collaboration between workforce, re-entry, and human service programs.

**Table 4: Civilians not in the labor force by sex and age, January 2018-December 2018 (based on CPS) (Numbers in thousands)**

| | Total | Age 16 to 24 years | Age 25 to 54 years | Age 55 years and over | Men | Women |
|---|---|---|---|---|---|---|
| | | | | | | |
| **Total not in the labor force** | 1,495.4 | 197.9 | 263.8 | 1,033.8 | 661.1 | 834.4 |
| Do not want a job now | 1,426.5 | 181.0 | 237.4 | 1,008.2 | 627.3 | 799.2 |
| Want a job | 69.0 | 16.9 | 26.4 | 25.6 | 33.8 | 35.2 |

| | Total | Age 16 to 24 years | Age 25 to 54 years | Age 55 years and over | Men | Women |
|---|---|---|---|---|---|---|
| Did not search for work in previous year | 42.7 | 8.5 | 14.9 | 19.3 | 20.4 | 22.4 |
| Searched for work in previous year | 26.2 | 8.4 | 11.5 | 6.3 | 13.4 | 12.8 |
| Not available to work now | 7.4 | 3.1 | 3.5 | 0.8 | 3.0 | 4.4 |
| Available to work now | 18.8 | 5.3 | 8.0 | 5.5 | 10.4 | 8.4 |
| **Reason not currently looking:** | | | | | | |
| Discouragement over job prospects | 3.2 | 0.4 | 1.8 | 1.0 | 1.6 | 1.6 |
| Reasons other than discouragement | 15.6 | 5.0 | 6.2 | 4.5 | 8.9 | 6.8 |

*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

The key labor market trend in Wisconsin is about workforce quantity. The fundamental challenge is finding enough workers to fill jobs across all industries and all geographies. The focus and effort of addressing the state's workforce requirements must fundamentally change. The basic premise of Wisconsin's workforce policy should be to "find every body available and get everybody trained up to the person's fullest potential." See *'Workforce constraints limit growth'* discussion below.

The latest estimate of Wisconsin's labor force participation rate (LFPR) is 67.3% (May 2019), compared to the 62.8% national rate. Wisconsin has traditionally had a higher LFPR than the national average. Wisconsin's LFPR fell from the late 1990s through 2013, largely consistent with the national trend. The state's LFPR stabilized in 2014 through 2017 and has since been declining once again. Continued focus should remain on developing and attracting workforce to bolster Wisconsin's labor force.

**Table 5: Typical Education for Entry Totals and Percent by Education Type 2016-2026**

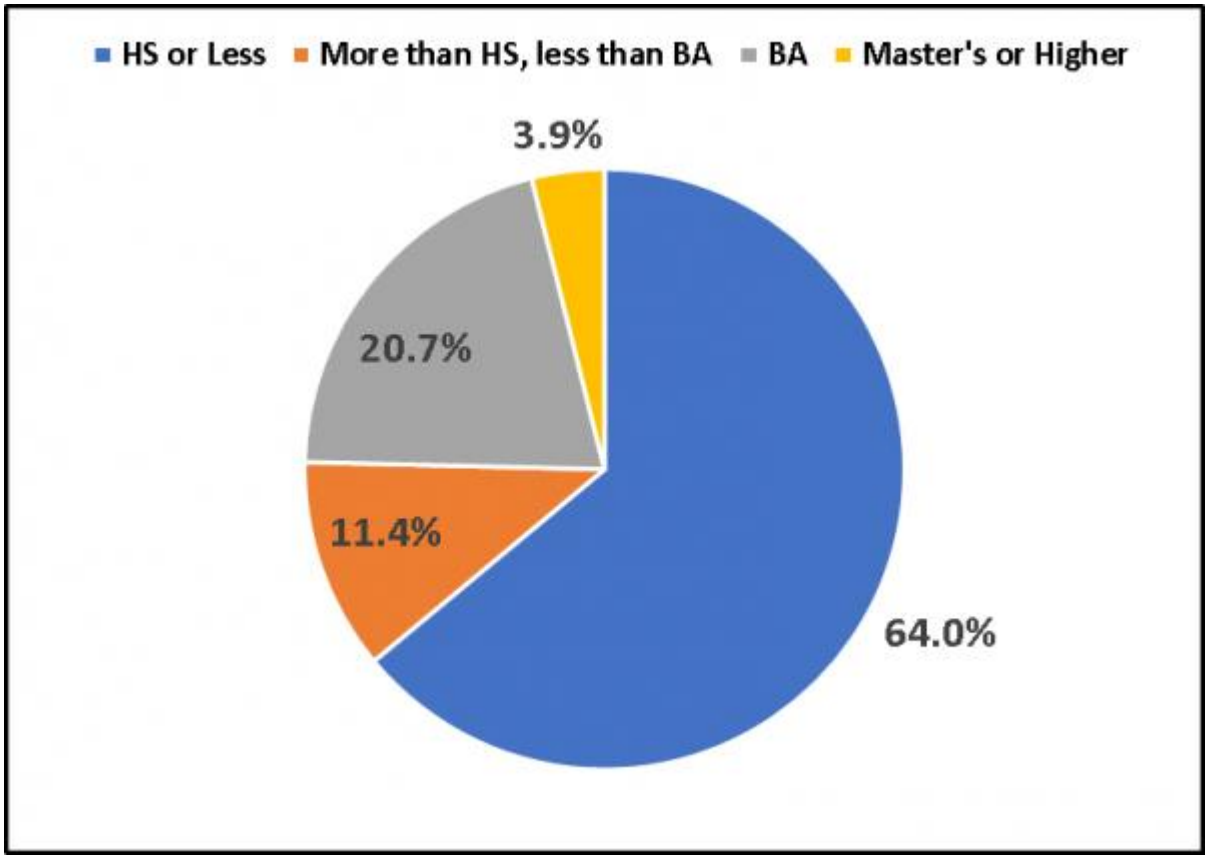
| Typical Education for Entry | # Jobs - 2016 | % of Total Job Base - 2016 | # Jobs - 2026 | % of Total Job Base - 2026 | 2016-2026 Numeric Change | 2016-2026 Percent Change |
|---|---|---|---|---|---|---|
| No formal education | 717,457 | 23.4% | 763,668 | 23.3% | 46,211 | 6.4% |
| High school diploma or equivalent | 1,264,211 | 41.2% | 1,329,109 | 40.6% | 64,898 | 5.1% |
| Some college, no degree | 73,164 | 2.4% | 75,518 | 2.3% | 2,354 | 3.2% |

| Typical Education for Entry | # Jobs - 2016 | % of Total Job Base - 2016 | # Jobs - 2026 | % of Total Job Base - 2026 | 2016-2026 Numeric Change | 2016-2026 Percent Change |
|---|---|---|---|---|---|---|
| Postsecondary non-degree award | 205,501 | 6.7% | 218,658 | 6.7% | 13,157 | 6.4% |
| Associate's degree | 72,960 | 2.4% | 79,261 | 2.4% | 6,301 | 8.6% |
| Bachelor's degree | 616,624 | 20.1% | 677,264 | 20.7% | 60,640 | 9.8% |
| Master's degree | 44,861 | 1.5% | 49,929 | 1.5% | 5,068 | 11.3% |
| Doctoral or professional degree | 71,458 | 2.3% | 78,152 | 2.4% | 6,694 | 9.4% |
| Total Job Base* | 3,066,236 | 100.0% | 3,271,559 | 100.0% | 205,323 | 6.7% |

**Includes only published/non-confidential data.*

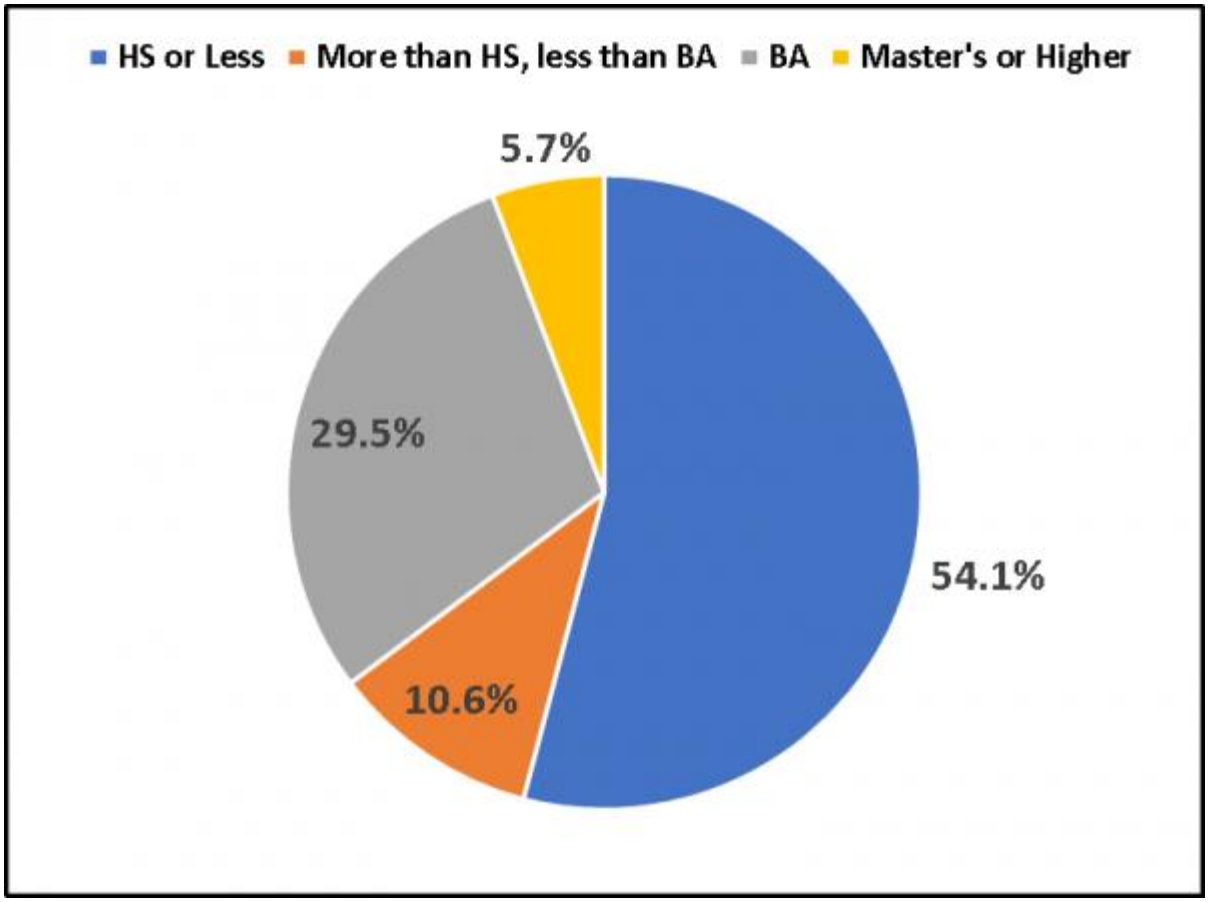
*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

**Chart 2: Education Needed for Entry: Projected Employment in 2026 - Percent of Total**




*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

**Chart 3: Education Needed for Entry: Annual Growth Openings 2016-2026 – Percent of Total**




*Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

The apparent 'skill gaps' is a two-part challenge for the state. Firstly, Wisconsin is facing a quantity challenge. Secondly, the quantity challenge foretells the 'skills gap' challenge; without enough workers, all industries and occupations will have too few appropriately skilled job candidates.

**Workforce Constraints Limit Growth**

Wisconsin's employment growth is constrained by difficulty finding workers to fill openings. Employers statewide have expressed concerns about the lack of qualified workforce to fill open positions. Employers in most industries and occupations voiced concerns about the lack of workforce available.

Opportunities in health care, IT, skilled trades, and skilled manufacturing occupations have increased, but job growth has been constricted by employers' inability to find adequately trained personnel. While specific technical skills are lacking, such as welding, CNC operators, IT engineers and technicians, and health care practitioners and technicians, there is a shortage of available workers across many additional occupations and skill sets, such as retail, customer service, and warehousing. Employers complain about the deficiency in Science, Technology, Engineering and Math (STEM) skills but also about the lack of "employability" skills: attendance, teamwork, communication, etc. Most employers today are willing to train new employees if only they could find and retain them.

**Quantity Challenge**

Wisconsin's demographics are evolving. Wisconsin's age 18+ population is projected to increase by over 760,000 from 2010 to 2040. However, almost all (99%) of that increase is in the 65+ population. While the age 18+ population grows, the active workforce itself will decrease.

At present, it is expected that older workers will stay in the labor force longer than they had in the past. Even with robust increases in the labor force participation rate (LFPR), growth in Wisconsin's workforce is limited at best. Changes in LFPR, the unemployment rate, and the jobs-to-worker ratio affect the state's labor supply and demand balance.

What changes with a quantity gap, versus a skills gap, is that most occupations see shortages. Traditionally, target training and/or other incentives were instituted to satisfy spot gaps in one or a few occupations, such as IT, or in the cycles across engineering disciplines. Worker skills could be shifted from a sector with ample workers to one with too few.

A general quantity gap, however, shifts worker skills from one sector to another, increasing the shortage in the former sector. Using wage incentives to attract workers is a proven tool but is a less viable solution for export industries that face global competition.

[1] Individuals can note more than one disability.

## 2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The core and non-core programs in the State Plan are coordinated through the following state agencies: Department of Workforce Development (DWD), Wisconsin Technical College System (WTCS), Wisconsin Department of Children and Families (DCF), Wisconsin Department of Health Services (DHS), and the Wisconsin Department of Corrections (DOC). The Governor's Council on Workforce Investment ensures that Wisconsin's workforce development efforts are aligned with the state's economic development and education effort.

Wisconsin has 11 workforce development areas. Each area has a local workforce development board (WDB) charged with providing local guidance and implementing workforce programs within its area. The state also has two planning regions.

Wisconsin has 57 job centers across the state. The job centers are overseen at the state level by the Department of Workforce Development and are managed at the local level by the local WDBs. Local WDBs are responsible for procuring a one-stop operator for the daily operation of their perspective center(s) in accordance with WIOA 121(d). The local WDBs carry out workforce activities by partnering locally though Memorandums of Understanding (MOU) to implement core and partner programs. In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (CTE) (Perkins), Community Services Block Grant, Indian and Native American programs, U.S. Department of Housing and Urban Development Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs Program (NFJP), Senior Community Service Employment program, Trade Adjustment Assistance (TAA) programs, Unemployment Compensation programs, and Youth-Build. TANF is not a required partner program at this time in Wisconsin.

Under WIOA, workforce development activities are categorized within the following areas – Career Services, Training Services, and Business Services. A description of each is provided below.

Career Services: WIOA has 13 required elements for career services, all which support customers making informed decisions about their career choices and to understanding the resources needed and available to assist them with pursuing their goals. All core programs participate in career services as much as possible through co-location at job centers. Workshops on a wide range of topics, including career planning, resume writing, and interviewing are provided. In addition, customers are referred to system partners for necessary resources and services. Title IV provides a wide variety of career services for eligible individuals that are individualized to meet the persons employment needs. These can also be done in coordination with WIOA Title Partner programs.

Over the last couple of years, DWD has made significant strides in modernizing the way participants engage and interact with the public workforce development system. The result of the modernization efforts has been the implementation of a case management application (referred to as "CEPT") that interfaces with several online tools that participants may access through the My JCW portal on jobcenterofwisconsin.com. The modernization efforts are not intended to replace face-to-face interactions between participants and their career planners; rather, it enhances the service-delivery process by allowing participants and career planners to more effectively exchange information and engage virtually. The online tools that DWD has already developed include a Budget Planner, Self-sufficiency Calculator, Unemployment Insurance Summary tool, Community Resources locator, Action Steps tool, Career Exploration tool, and Individual Employment Plan (IEP)/Individual Service Strategy (ISS) development tool. Collectively, these tools help participants build financial literacy, connect with resources to address potential barriers to program participation, identify appropriate training and occupational goals, and outline the action items that will lead them to goal attainment. DWD created the CEPT application and online tools with input from an ongoing workgroup comprised of representatives from the local WDBs and their Title I service providers, Title III, the Office of Veteran Employment Services (OVES), and TAA.

While the modernization efforts have focused on the state's Title I-funded programs, the majority of the online tools are accessible to the general public and can therefore be leveraged by other core and partner programs. Additionally, the CEPT application is already available to Title III, OVES, and TAA staff and has been built in a fashion that would allow for future expansion to other core and partner programs.

As part of this State Plan, DWD will continue to lead efforts to further enhance the CEPT application and the existing online tools, as well as develop new tools to improve the way customers engage with the public workforce development system. Additionally, DWD is taking steps to require that Title I and TAA use the IEP/ISS development tool for program participants. DWD is planning to implement a pilot in early 2020 to evaluate the required use of the IEP/ISS development tool by Title I and TAA.

Training Services: Under WIOA, the public workforce development system's approach to training services places a greater emphasis on work-based learning, stackable credentials, and career pathways. All core programs participate in training services to the extent allowed by federal rules and regulations. Title I supports education and training for adults, dislocated workers, and youth. Title IV supports individuals with disabilities. Title II supports a diverse population with basic skills attainment and preparation for postsecondary education. Title III, which does not have funds for training services, is often the first point of contact for customers,

serving as a hub in the referral process. Title IV works with individuals with disabilities and provides a wide variety of training to eligible consumers when necessary and appropriate to achieve their employment goal. Training can include: on the job training, work experiences, short-term training programs, postsecondary education, etc.

For the Title I Adult and Dislocated Worker Programs, Individual Training Accounts (ITAs) are the primary method for funding participants' training services. The Title I Youth Program also uses ITAs to fund training services for out-of-school youth. Training funded through an ITA must be selected from Wisconsin's Eligible Training Programs List (ETPL). Wisconsin's ETPL is published online and provides detailed information about programs eligible for ITAs, including cost information and aggregated performance metrics related to students' program completion and their employment and earnings outcomes. The information supplied on the ETPL allows participants and career planners to make informed decisions when selecting training. During Program Year 2019, DWD significantly redesigned its ETPL system by:

- establishing standardized state-level policies and procedures that replaced the 11 workforce development areas' local policies and procedures,
- centralizing vetting processes, eligibility determinations, and appeal processes at the state-level, and
- building technological solutions for data collection and publication requirements.

DWD's goals for its ETPL are threefold: (1) to build a robust list of high-quality training options for its Title I Adult, Dislocated Worker and out-of-school Youth participants across the state, including promoting ETPL participation to sponsors of registered apprenticeship programs, (2) to ensure the online ETPL application process is user-friendly for training institutions interested in joining the list, and (3) to explore ways the ETPL may benefit other public workforce development programs that offer training services to their participants.

Through the Title I programs, the local WDBs are able to provide work-based training, including on-the-job-training, customized training, incumbent worker training, and transitional jobs, either directly, if the local WDB serving the participant has a waiver from the Governor to provide the training directly, or through a contract for services under one of the five exceptions outlined in 20 CFR § 680.320.

Business Services: Wisconsin's Business Services Teams (BST) coordinate activities and resources with WIOA core and Combined State Plan programs to provide comprehensive, high-quality, customer-centered services to employers. The core programs and Combined State Plan partners meet regularly and collaborate to ensure that employers receive the best services available to them. BSTs provide services that include, but are not limited to: recruitment, human resources consultation, workforce incentive information, resources, training programs, tailored labor market information, and access to a the labor pool.

Representatives on each BST include a representative of the local WDBs, Bureau of Job Service, Division of Vocational Rehabilitation (DVR), Registered Apprenticeship (RA), Office of Veterans' Employment Services (OVES), and other WIOA partner programs as required or deemed necessary by local teams. Some local areas also include TANF and FSET representatives.

DVR has 12 Business Service Consultants (BSCs) and one Policy Initiative Advisor who work to align business outreach strategies in a tiered approach, focusing on national (National Employment Team, or NET), state (such as energy sector), and regional business needs and initiatives. Strategic business outreach and relationship development, whenever possible,

includes Combined State Plan partners in a coordinated effort to provide seamless, cohesive services to Wisconsin businesses. Title I, III, and IV work collaboratively at the state level to coordinate business workforce initiatives. Title I, III, and IV business service representatives each other's skill sets to best serve business establishments in Wisconsin;

Analysis of the strengths and weaknesses of Wisconsin's workforce development activities suggests that the state's public workforce development system has the right expertise and pockets of excellence. Successfully serving common customers in our system will require continued collaboration, coordination and re-assessment.

**Strengths**

Collaboration: Strengths identified include the successful partners and programs that exist and can be leveraged, both at the state and local levels. The extensive collaboration that has grown since WIOA enactment serves as a foundation for continued partnerships. The Workforce Innovation and Opportunity Act Leadership Team (WLT) functionalizes the collaborative activities and maintains several inter-agency workgroups that work on WIOA details. The WLT consists of senior leaders from DWD, WTCS, DCF, DOC, and the DHS. The workgroups include the Policy and Guiding Principles Team, Communications Team, Data Steward Team, and the IT Team.

During the PY20-23 Combined State Plan modification planning period existing core partners and the new Combined State Partners will determine what actions and activities will constitute successful collaboration. Once operating procedures are clear, policy and supporting IT can be implemented.

Education System: WTCS has seen tremendous success in expanded career pathways, increased integrated education and training opportunities, and increased performance in Adult Education and Family Literacy. In relation to the 52% Measurable Skill state goal, six of the 24 grantees performed at 110% or higher. Statewide, we exceeded our goal with a 2018-19 rate of 54.1%. The annual Graduate Placement Survey for 2018 indicated strong outcomes for the 25,000-plus respondents. Of those surveyed:

- 97% of graduates were satisfied with their education
- 94% of respondents were employed within 6 months of graduation
- 94% were employed in the State of Wisconsin
- 79% were in a job related to their training
- 61% of graduates were women
- 18% of graduates were students of color
- Average median salary was $43,678

Alignment with Economic Development: The WTCS mission is to deliver skills and training that recognizes and responds to the rapidly changing educational needs of residents to keep current with the demands of the workplace. WTCS programs are driven by employer advisory groups, ensuring that training and skills match the emerging needs of the state’s diverse economic development sectors.

Partnerships with K-12: Twenty-five percent of DVR's customers are high school students. DVR works closely with the K-12 system to provide integrated services to students. A DVR Counselor is assigned to every high school in Wisconsin and meets with students at the school in most cases. DVR also has Memorandum of Understanding (MOU) with the Department of Public Instruction regarding transition braiding of funding and services.

**Weaknesses**

Training Inequity: Clients of color are disproportionately enrolled in training programs that will have them earning less than $26,000, while their counterparts are disproportionately enrolled in higher-paying programs with an average expected salary exceeding $56,000 (WTCS Systemwide Equity Report 2018).

Common Language: The public workforce system is fragmented and lacks a consistent language to communicate its services to both jobseekers and employers. An analysis of the workforce development system by the Wisconsin Policy Forum showed that in 2017, eight state agencies administered 38 programs that provided employment and training services.

Professional Development: Workforce system staff would benefit from increased knowledge of partner programs. Field research conducted by the Integrated Service Delivery workgroup showed that staff would benefit from standard training on partner programs. This would increase knowledge of partner programs and create a more inclusive system.

Sharing Programmatic and Performance Information: Analysis of the current workforce development system, including mandatory and optional job center partners suggests a weakness in terms of sharing programmatic and performance information. The state intends to remedy this through sharing of information (see section on integrated data systems) as well as through the Governor's Council on Workforce Investment's (CWI).

Five of the state's six core programs are housed in a single state agency allowing for optimum coordination in planning and operations. Wisconsin's local WDBs and their partners have all strived to find innovative methods of serving participants and employers in local and regional workforce development ecosystems. When successful, they have developed model programming that can be distributed through the CWI. When program design has not produced desired results, the local providers have adjusted, refined, and shared their lessons.

The local WDBs conduct customer service surveys to help ensure that they are continuously improving their services. The best practices that exist around the state provide great opportunity to increase our capacity for serving those who can benefit significantly from our training and education programs.

Adult Basic Education (ABE) and English Language services are the responsibility of the Wisconsin Technical College System (WTCS) and its 16 colleges (statewide system). Additionally, many community based organizations (CBOs), literacy councils, and county jails, some of which receive funding through the competitive Adult Education and Family Literacy Act (AEFLA) grants process, assist in the provision of these services.

As a result, all AEFLA funding through WIOA Title II is awarded to WTCS. All activities funded by WIOA Title II are authorized, approved, and overseen by the Associate Vice President (AVP) of the Office of Student Success, who serves as the State Director of ABE on behalf of the WTCS Board. Activities are executed by the AVP and ABE staff in that office.

The Division of Vocational Rehabilitation (DVR) supports a "dual-customer" approach to service delivery, serving both individuals with disabilities who want to work and the businesses who want to connect to this workforce pool. DVR offers services to businesses that include outreach, follow along, and customized services geared toward meeting business needs. DVR Business Services are part of a collaborative workforce solutions system that also includes other state agencies and workforce partners. DVR Business Services team members participate in collaborative training with other business services professionals to ensure a shared understanding of the various programs and services available to business, share best practices, and work toward a consistent service delivery strategy statewide. Business services professionals representing various programs and services serve on a local business services team and use a shared business relationship (account) management system to effectively communicative activities with businesses in real-time.

DVR staff receives training and information on in demand occupation and other labor market information (LMI) which are considered when developing individualized plans with consumers. Joint workgroups of all the titles are set up to address WIOA requirements and workforce challenges at the state level and DVR participates as a member or leader/co-leader of some of the workgroups.

DVR and Wisconsin Works (W-2), the state's TANF Work Program have established a memorandum of understanding and Technical Assistance Guide to ensure that disabled individuals co-enrolled in these programs have coordinated case management, shared employment goals and overall service coordination.

OVES is funded by the DOL Veterans and Training Services, Jobs for Veterans State Grant (JVSG). Two JVSG-funded supervisors are stationed within two regions of the state and provide day to day supervision of Local Veterans Employment Representative (LVER) and Disabled Veterans Outreach Program (DVOP) staff. All DVOP or LVER staff are integrated within job centers throughout the state. OVES management staff ensure all LVER and DVOP staff possess knowledge of requirements specified by Title U.S.C. Chapter 31 requirements and guidance provided through DOL Veteran Program letters.

LVERs are fully integrated within the business service teams and conduct employer outreach as members of that team. The sole function of the LVER is business services and interaction with employers. DVOPs are housed at job centers and provide individualized career services for veterans with significant barriers (SBE) to employment and other eligibles. A pre-screen form is used to determine if veterans meet the definition of a veteran with SBE. Veterans that are determined to be SBE are referred to DVOP staff or other career planners within the job centers. DVOPs provide the necessary support and use a case managed approach to assist veterans with their employment needs. In addition to providing individualized career services to SBE veterans that visit the job center, DVOPs conduct outreach to find SBE veterans not utilizing job center services. As part of a memorandum of understanding with the Veterans Affairs (VA) and the Department of Labor (DOL) DVOPS provide individualized career services and follow-up services for disabled veterans enrolled in the Veterans Administration Chapter 31 rehabilitation program. DVOPs visit Wisconsin Correctional facilities and provide individualized career services for veterans scheduled for release.

In 2019, DWD received a grant from the U.S. Department of Labor to expand and enhance Wisconsin's Workforce Data Integration System (WDIS) and create a Longitudinal Data Warehouse (LDW). The improved WDIS and corresponding governance will allow DWD to efficiently identify services that lead to successful outcomes for participants.

DWD's Bureau of Workforce Information and Technical Support (BWITS) regularly collaborate with local WDBs, DWD staff and other key stakeholders to provide data and analysis for program planning and evaluation. BWITS recently updated its web-based tools and website (Wisconomy). BWITS is also responsible for developing 10-year projections of statewide and regional occupational employment and wages, job vacancies and employment trends. Regional economists regularly work with local WDBs and other stakeholders to provide data and analysis for on sector strategies, and program planning and evaluation.

## B. STATE STRATEGIC VISION AND GOALS

***Vision:*** *We will deliver a results-driven workforce development system providing the opportunity for Wisconsin's current and future workforce and businesses to sustain economic viability for individual and family self-sufficiency.*

Wisconsin will create a workforce development system that shall respond to:

1. Employers' needs around skills, knowledge and ability, as well as changes in industry and sectors;
2. Workers and job seekers needs, whether through new skill acquisition or through resources to overcome barriers to employment per WIOA Section 3. Alignment of Combined State Plan activities with education and regional economic strategies will aid in providing access to self-sufficiency; and
3. The quantity challenge by bringing those not participating in the labor force/workforce to the programs and services needed for them to become ready to participate.

Wisconsin's workforce development system shall also include a "one-stop," which any employer, worker, or job seeker may access the aligned resources and programs of the system. The state's job center system (JCS) shall provide electronic access to the available resources in an integrated manner. Programmatic data and evaluation results shall provide partners and elected officials with information to ensure continuous improvement of the state's workforce development system.

2. Goals

*Describe the goals for achieving this vision based on the above analysis of the State's economic conditions, workforce, and workforce development activities. This must include—*

- *Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment[1] and other populations.[2]*
- *Goals for meeting the skilled workforce needs of employers.*

***Goal 1: Access:*** *Establish a customer-centric focus to increase coordination, effectiveness, and access to workforce development programs.*

Wisconsin aims to create a workforce development system that is fully accessible to any eligible person both physically and programmatically. An objective of this goal is the concept of "no wrong door" within the one-stop system, meaning that an individual seeking assistance will be welcomed at any point of intake. Both employers and job seekers will be able access services through a seamless system. The "no wrong door" concept ensures that individuals with barriers to employment per WIOA Section 3[3] are not routed prematurely to a particular program without informed customer choice and an accurate assessment of how they might be best served.

Wisconsin will also increase equitable access to education and training by identifying groups or individuals that have the greatest disparities in educational, skills training, and employment outcomes. These gaps will be identified through state and regional census data to ensure that local efforts across the partners address how to engage individuals that are underserved by race, disability, age and/or gender(s). In addition, equity in access will include developing and enhancing employer partnerships that expand the talent pipeline to be inclusive of gender, race, and disability to meet industry demands for a skilled workforce.

Wisconsin will also work to increase staff awareness of the lasting impacts of life experiences (e.g. poverty, family illness, addiction, violence, etc.) that influence customer success. When we recognize that educational and economic success requires that we address and interrupt trauma, we can create services and learning environments that support customers holistically. We will ensure eligible participants are referred to emergency funds and other resources that assist with transportation challenges, housing insecurity, food insecurity, daycare needs, and assist in navigating community and employer supports to ensure that they achieve their educational and employment goals.

***Goal 2: Alignment:*** *Engage partner staff to increase system alignment.*

Through focus groups conducted during the previous state plan period, it was clear that strong collaboration and coordination happens at the local level. However, the public workforce system needs to engage staff from all partners, including new Combined State Plan partners FSET, TANF, and Reentry toalign efforts at both the state and local levels. This includes cross-education on all programs for all staff. The WIOA Integrated Service Delivery Communications workgroup has been developing training and materials that will be available to all WIOA partner staff.

***Goal 3: Accountability:*** *Facilitate meaningful outcomes through alignment of governance, accountability, and metrics.*

Improvement within the workforce development system is often stifled by a lack of shared governance. A cross-functional work-group of state and local staff has been created to develop WIOA data governance. Wisconsin's WIOA programs will have successful outcomes as defined by the WIOA primary indicators of performance. The state workforce development board will review federal performance outcomes. The state will also look at metrics beyond the WIOA common measures to achieve Wisconsin's vision of ensuring that all residents have access to high-wage, high-skill education, and training for in-demand occupations to maintain economic self-sufficiency.

These evaluations will require collaboration amongst a variety of state partners, including secondary and postsecondary education providers, economic development entities, workforce development organizations, local and state corrections departments, public and private-sector employers, and community-based organizations.

[1]*Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for*

*Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.*

[2]*Veterans, unemployed workers, and youth and any other populations identified by the State.*

[3]*Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.*

Assessment

Wisconsin's core WIOA programs will assess its overall effectiveness using the WIOA Primary Indicators of Performance. Core and existing partner programs will assess performance based on the adjusted levels of performance. New Combined State Plan Partner programs will collaborate to determine appropriate indicators and tools for reporting performance. Core and partner programs will assess its performance based on the adjusted levels of performance. Areas of strength and improvement may be distinguished by reviewing current performance and performance trends. Program managers, at all levels, will use these monthly assessments to further target assessments to determine root causes for strong and weak performance. WIOA performance results are reviewed at CWI meetings.

## C. STATE STRATEGY

*Increased Collaboration and Program Alignment*

Five of the six core WIOA programs are administered by DWD – Title I Adult, Dislocated Worker, and Youth; Title III Wagner-Peyser; and Title IV Vocational Rehabilitation. Title II is administered by the Wisconsin Technical College System.

For this State Plan, Wisconsin has three new State Plan partners – the Departments of Health Services, Children and Families, and Corrections. In Spring 2019, DWD Secretary Frostman convened potential plan partner's cabinet-level leadership to discuss State Plan inclusion as part of Governor Evers' policy goals of "connecting the dots." Following the meeting, DWD organized a WIOA State Plan Kickoff Meeting in June 2019 with new partners in attendance.

Wisconsin recognizes the need for increased collaboration and program alignment between the Core and Combined State Plan program partners. The WIOA Leadership Team is comprised of executive leadership from all WIOA partners. The team will focus on reviewing and implementing policy recommendations, increasing program alignment, strengthening communication, improving effectiveness, and providing seamless transitions between programs in order to improve services for job seekers and employers.

The concept of "no wrong door" within our job centers will ensure that all individuals are not routed to a particular program without informed customer choice and an accurate assessment of service needs. Through the assessment process, career exploration staff will be able to meet the needs of the customers by coordinating services and leveraging resources that best serve individuals, including those with barriers to employment.

*Using Labor Market Information to Promote Sector-Based Training*

Sector strategies, regional, industry-focused approaches to build skilled workforces are an effective means of aligning public and private resources to address the workforce needs of employers. Accurate and current labor market data and guidance about career and education opportunities assists individuals in making better decisions about education that can lead to better outcomes and support policy and program planning. Wisconsin will promote demand-driven sector strategies and solutions. Wisconsin has been using data-informed decision making to quantify the state's most competitive and emerging industries. Labor market information will continue to be used to map and assess current sector activities and to identify successes and challenges along with emerging labor market areas. This data will be used to understand the skills required for the current and future workforce and to prioritize target industries.

We will expand sector strategies to enhance and strengthen our economic vitality by addressing employer and job-seeker workforce needs. Sector partnerships implement effective coordinated responses and integrate resources to develop the workforce and workforce needs of key industries of a regional labor market.

Overall guidance and support of sector partnerships will be guided through the state Workforce Development Board. Over the next four years, we will work to ensure that education, training, and workforce systems remain responsive to the needs of the labor market by preparing students, job seekers, and workers with the necessary skills and credentials. Sector partnerships must be closely aligned with the education system to develop flexible and responsive career pathways. This will provide all levels of workers multiple entry and exit points along career pathways and cultivate the workforce pipeline for employers.

The regional and local plans require local WDBs to identify in-demand and emerging industries and occupations. DWD supports the local WDBs by providing data to assist them with identifying industry sectors for their regional and local plans. DWD provides guidance and final approval of regional and local plans, thereby creating a focused sector strategy across the state.

*Increasing Knowledge of and Access to Career Pathways*

In order to collaborate successfully across agencies, systems, and customer, we will provide guidance, align practices between stakeholders (including business and industry), and engage in information sharing as allowed. We will build on our career pathways foundation by continuing to coordinate learning and professional development for system, partner agencies, and training of staff. We have found that our business partners are not always familiar with career pathways. Over the next four years, we will work to leverage the state's sector partnerships to understand

the number of industry-recognized credentials and identify the business community's awareness of them. Guidance and support will be provided statewide and at the agency level by the Wisconsin Career Pathways Committee.

Building upon the success of Wisconsin's existing career pathway programming, efforts will focus on increased services for populations with barriers that will address the preemptive and strategic aspects for better education and training services necessary to meet the needs of job seekers and employers. We will focus on customer-centered design of services for WIOA participants, including those customers who might need multiple services to be successful.

The state acknowledges the role that local WDBs play in supporting access to career pathways through job centers and programs. WIOA makes clear that the WDBs "shall lead efforts in the local area to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services…" Wisconsin's WDBs have astutely synced career pathways with sector strategies. The investments the WDBs make into career pathways at local technical colleges and through sector strategy teams are vital to this state strategy. The state, through the WIOA Leadership Team, will ensure that the local WDBs convene local partners as they lead efforts relating to career pathways in the local areas.

Technical colleges will continue to rely on advisory committees, comprised of local business and industry leaders, to support current programming and to develop new programs and new career pathways. In addition, technical colleges will work with local workforce boards and job centers to connect clients with the right program. Technical colleges will also work with these partners and economic development agencies to support sector partnerships. Designated Career Pathway contacts located at each technical college will assist in local career pathway enactment. Best practices will continue to be evaluated and incorporated to support better transition for learners and improve outcomes.

Career Pathways are developed and supported in Wisconsin's K-12 public school districts through the federal Carl D. Perkins Career and Technical Education Improvement Act requirements for quality career pathways. Educational standards in six career and technical education (CTE) subject matter areas are aligned with 16 career clusters developed in partnership with business. They are used to develop classroom curriculum resulting in programming that:

- Blends rigorous academic/technical preparation;
- Provides for career development through academic and career planning (ACP) opportunities; and
- Facilitates/assists students and educators with ongoing transitions from high school to postsecondary education, training and work.

Expanding Integrated Education and Training offerings will better serve WIOA partners and participants. Integrated Education and Training (IET) is the core educational strategy for career pathways jointly developed between WIOA partners. IET is a strategy across all levels of service delivery in WIOA Title II, the Adult Education and Family Literacy Act (AEFLA) and can include a wide variety of WIOA Title I career and training services as well as other partners. IET represents a wide spectrum of services to build foundational, employability, and occupational skills. IET is adult education and literacy, workforce preparation, and workforce training, each of sufficient intensity and quality, and based on the most rigorous research available, especially with respect to improving reading, writing, mathematics, and English proficiency of eligible individuals. IET instruction occurs simultaneously, using occupationally relevant instructional materials and are organized to function cooperatively with a single set of learning outcomes (34 CFR §463.37). IET programs under WIOA in Wisconsin have shown strong successes in credentialing rates, measurable skill gain, and employment outcomes, and this approach should become a feature of many Title I/Title II occupational credential programs; Integrated English Literacy & Civics Education programs; Certified Pre-Apprenticeship programs, Corrections Education programs; and Out-of-School Youth programs.

*Expand Opportunities for Work-Based Learning and Credential Attainment*

Wisconsin will expand work-based learning opportunities for adults and youth. The state will focus on serving a diverse community of job seekers, including veterans, returning citizens, individuals with disabilities, low income individuals, youth in and aging out of the foster care system, and those seeking employment in non-traditional occupations.

Wisconsin will focus on expanding its registered apprenticeship program and increase collaboration with Combined State Plan partners. The Wisconsin Bureau of Apprenticeship Standards (BAS), with assistance from DOL-administered grants, continues to expand registered apprenticeship programs into in-demand sectors. BAS is working to expand the number of certified pre-apprenticeship programs in the state—especially those that feed into high-demand registered apprenticeship programs, such as in construction and manufacturing—and certify and create new pre-apprenticeship programs that serve the needs of industry. Not only do these pre-apprenticeship programs provide pools of qualified applicants for sponsors of registered apprenticeship programs, but they also help to bring such opportunities to populations generally underrepresented in registered apprenticeship, such as minorities, women and ex-offenders.

In addition to certified pre-apprenticeship programs, Wisconsin's Youth Apprenticeship program may serve as an introduction to registered apprenticeship. BAS is amidst an ongoing effort to bridge the competencies learned in Youth Apprenticeship programs to their corresponding registered apprenticeship program and help employers understand the similarities and differences. Through the bridge program, crosswalks are created to assist the youth apprentices in obtaining work and educational credit toward a registered apprenticeship program, if they choose to remain in the trade after high school. Moving forward, BAS hopes to bridge additional programs to create a more stable long-term career pathway for both students and employers in each industry, include the health, information technology, finance, and transportation sectors.

Wisconsin will expand integrated work-readiness programs and work-based learning opportunities, such as On-the-Job Trainings. In addition to focusing on work-based learning programs, Wisconsin will promote training strategies that lead to credential attainment in demand-driven sectors.

*Use Technology Solutions that Increase Collaboration and Innovation*

*The state will expand and enhance Wisconsin's Workforce Data Integration System, which includes improving data governance and required infrastructure to streamline and improve the ability to connect data between workforce programs. It will result in the ability to match individualized data records between workforce program data systems, establishment of the governance and processes for the system to receive and process evidence building activities requests, including program evaluations and research studies. The creation of data dictionaries standards and technical data documentation standards will ensure the data is trusted and of high quality. By improving the Workforce Data Integration System, the public workforce system will be able to more efficiently deliver services leading to successful outcomes for participants while enhancing the scope and quality of workforce programs evaluations and other evidence building activities.*

In addition, to enable DWD to operate and execute its mission, the agency will facilitate the modernization of legacy applications to improve service to job seekers and businesses. To accomplish the WIOA goal of "common intake," Wisconsin has procured a tool that matches individual records between different data systems. This tool will be used for specific data sharing between participating partners. This includes sharing data between the electronic case management systems of participating partners to identify if a participant is already working with another partner, the ability to make and track electronic referrals between partners, and the ability to collect basic information from other systems to help streamline the customer experience for those customers who work with more than one partner agency. The matching tool will combine data between participating partners to generate co-enrollment reports to enable an evaluation of the impact of co-enrollment. The matching tool will reduce the number of duplicated records, created through human error, in the WIOA program's management information system to maximize data quality. The WIOA programs will identify reliable data sources from third parties to automate collection of required data elements to reduce customer and staff burden.

WIOA core partners will share customer information under the following circumstances:

1. In order to improve program outcomes and meet federal reporting, core partners will share aggregated data that does not contain personally identifiable information; and
2. In order to identify appropriate services within, and make referrals to, the partners' programs, core partners will share customer-specific information with explicit customer approval .

We will continue to support the WIOA requirements of service provider report cards for the Eligible Training Provider List (ETPL) through data sharing, and we will focus in this plan on analyzing data, share findings with other partners, and facilitate discussions for improvements. We will encourage all partners to use the easily accessible report cards with job seekers, WIOA core partners, and the public. Each partner will ensure that its own staff is kept trained on how to access and use the report cards.

WIOA partners may execute data sharing agreements (DSA) to allow partners to use each other's data in accordance with WIOA reporting requirements and continuous improvement of program coordination that leads to a better customer experience and program outcomes.

All partners will respect the privacy and diverse nature of the clients being served. The partners will develop a robust privacy policy that includes the customer being informed of how their data is used in the aggregate without their consent and the client specific sharing which is only done with their consent to identify appropriate services and make relevant referrals. Job seekers will be informed of the two purposes for sharing information:

1. Aggregated information that does not contain personally identifiable information will be shared for the purposes of program improvement and federal reporting; and
2. Client-specific information that staff in core partners may access for the purposes of identifying appropriate services within the partner's programs and making relevant referrals to other partners' services.

Job seekers may limit the sharing of their information with other core partners for the purpose of services and referrals but may not limit the sharing of aggregated data. All program staff in all WIOA core partners will be trained on the privacy policy.

1. WIOA performance reporting: Core partners will share in the development of performance goals and results of DOL/ED performance negotiations.

2.

3. Participant demographic, service and outcome information: All WIOA partners will have access to the WIOA shared data for purposes to make appropriate referrals, and to reduce the participant's burden for required data collection.

## III. OPERATIONAL PLANNING ELEMENTS

## A. STATE STRATEGY IMPLEMENTATION

### 1. STATE BOARD FUNCTIONS

The Governor's Council on Workforce Investment (CWI) comprises business, workforce, and government representatives from throughout the state who represent key industries and programs instrumental to the effective implementation of the public workforce development system in Wisconsin. CWI is the federally-mandated entity under the Workforce Innovation and Opportunity Act that assists the governor in developing innovative and dynamic approaches to develop Wisconsin's workforce.

Executive Order #152 provides initial direction to CWI, which was reconstituted under Governor Evers' Executive Order #6 in January 2019. The Council is administratively housed within the Department of Workforce Development. All members are appointed by the Governor.

The Council is charged with aiding Wisconsin employers in finding the workers that they need and providing resources to enable workers to access training for in-demand careers with the ultimate goal of moving Wisconsin's economy forward. Members assist in crafting a comprehensive workforce development strategy that:

- Anticipates employer labor needs while building and strengthening Wisconsin's workforce;
- Supports the development of a highly-skilled labor force; and
- Empowers individuals to pursue and retain good paying careers

In keeping with their charge to align Wisconsin's workforce and workforce development initiatives and investments with its economic development strategies, in 2017, the Council traveled the state to gather data and feedback from stakeholders. This data and research was compiled and produced in their 2018-2022 Strategic Plan, which was subsequently submitted to the Governor. This Strategic Plan centers around 5 Priority Areas listed below:

1. Increase educational attainment and make it affordable for all Wisconsin residents
2. Increase net migration to Wisconsin
3. Increase awareness and expand worker training programs, internships, and apprenticeships
4. Serve under-represented populations
5. Improve access and understanding of workforce investment assets

**Standing Committees and Working Groups**

The Council currently employs one standing committee and three newly formed working groups that going forward will formalize a structure for stakeholders in Wisconsin's workforce development system to actively participate in the maintenance, support, and refinement of the system's activities. The committee and working groups consist of a diverse range of stakeholders, including employers, and has representation in the fields of education, economic development, workforce development, community-based organizations, chambers of commerce, healthcare, local government, and more. The committees shall report to the Council and submit recommendations for approval during formal committee reports at Council meetings except when the standing committee acts on behalf of the Council based on prior authority granted by the Council for a specific purpose. The chairs of the committee shall establish appropriate rules for management of the committee's business.

It is not required that all working group members be members of the Council; however, all council members are required to serve on a working group and each working group must consist of a majority of council members. The working group co-chairs shall convene meetings in coordination with council meetings, and as needed upon the call of the Council Chair.

Executive Committee: The Executive Committee is comprised of the Chair, Vice Chair, Executive Director, and the chairs of the working groups, though the Chair may designate additional council members to serve on the committee at his/her pleasure. The Executive Committee provides overall direction to the council activities and serves as the workforce board governing body, including taking action on matters when time does not allow issues to be addressed at a regularly scheduled council meeting. A majority vote of the Executive Committee is required for all such actions, which must be reviewed by the full Board at the next regularly scheduled meeting.

Employment Training Infrastructure Working Group: This working group will focus on Priorities I and III of the 2018-2022 Strategic Plan, and will cover issues including but not limited to: apprenticeship (RAs, YAs); WI Fast Forward; Internships; Career Pathways; industry specific training needs (e.g., healthcare, child care, IT).

Growing Workforce Opportunities Working Group: This working group will focus on Priorities II, IV, V, and will address removing barriers; improving economic infrastructure (e.g., child care, transportation, health care), and attracting and retaining workers in Wisconsin.

WIOA Compliance and Resource Alignment Working Group: This group will assist the Governor in carrying out his federally-mandated WIOA responsibilities while ensuring ongoing alignment of resources across sectors.

Other Committees, Task Forces, and Ad hoc Committees: The Council Chair, in consultation with the Executive Committee, may establish *ad hoc* or special committees, workgroups, or task forces to assist the Council in carrying out its responsibilities. The scope, duration, and membership of the committee shall be determined by the Council Chair at the time of the appointment. At least one member of an ad hoc or special committee, workgroup, or task force must be a council member.

All members of an ad hoc committee established under these by-laws may participate fully and may vote on any matters before the committee. Members of an ad hoc committee who are not council members shall still be subject to the conflict of interest provisions of Section 3.4 of the CWI bylaws as a condition of their membership on the committee.

Currently, the CWI has one special committee. The Wisconsin Agricultural Education and Workforce Development Council (WAEWDC) was recently reassigned from the Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP) to help place greater emphasis and focus on the goals and needs of Wisconsin's agricultural workforce pool.

**Staffing**

The Council is supported by staff within the Department of Workforce Development's Division of Employment and Training. The CWI Policy Analyst serves as the point person in providing the Council with overall operational support and policy advisement. The staff person assigned to each of the working groups coordinates with the CWI Analyst to fulfil the same roles on the working group level.

## 2. IMPLEMENTATION OF STATE STRATEGY

## A. CORE PROGRAM ACTIVITIES TO IMPLEMENT THE STATE'S STRATEGY

The Governor's Executive Order 152 directs state agencies to collaborate with the Governor's Council on Workforce Investment and the Wisconsin Job Center system to develop a strong, skilled workforce. Memoranda of Understanding (MOU) between the Council, DWD, and the Wisconsin Workforce Development Association (WWDA), as well as between DWD, Wisconsin Technical College System (WTCS) and the Wisconsin Economic Development Corporation (WEDC), and between DWD and the Department of Public Instruction formalize multi-agency collaboration. New MOUs between the established agencies and DCF, DHS, and DOC will need to be created over the next two years to ensure successful collaboration in the provision of services to job seekers, workers and businesses.

DHS will consult with DWD, the WWDA, and other WIOA partners to inform regional FoodShare Employment and Training (FSET) vendors of statewide and local employer needs to assist in the development of regionally provided education, training, and work experience activities.

DCF will work with DWD and other WIOA partners to strengthen local collaboration and partnerships to ensure all Wisconsin residents have equal access to programs and services that will allow them to fully participate in the labor force. DCF will provide CWI and the other WIOA partners information and guidance on DCF programs, activities and services to low-income parents, at-risk youth, refugees, and childcare recipients and providers.

The WIOA Leadership Team functionalizes the collaborative activities and maintains several cross-agency teams that work on WIOA details. With the implementation of WIOA, specific strategies have been utilized to align the work of core and required partners at both the state and local level. Leadership from the one-stop partner programs comes together monthly as an Implementation Team to provide guidance on the work and make commitments to specific actions necessary for moving forward. MOUs between agencies will be implemented as needed to support the alignment of efforts and activities.

Through this state planning process, the clear need for staff development for all system partners has been made apparent. Therefore, Wisconsin will develop training to ensure that all partners have the appropriate knowledge of each of the programs to make proper referrals for customers. The expertise of each of the partners will be utilized in developing the training materials.

Employers are engaged in the workforce development system through sector partnerships and through our statewide business services team. To continue the excellent work that has been done over the past three years, one-stop partner programs will be included in the business services team and common procedure manuals will be developed to align the work of multiple agencies.

The Governor's Council on Workforce Investment (CWI) will examine the employment practices of "High Road" employers as both a workforce and economic development strategy to help strengthen employee retention and reduce business costs associated with turnover; increase the state's career pathways efforts, and help individual's gain self-sufficiency.

## B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

In September 2016, Wisconsin's educational entities signed a MOU that reinforces the role of career and technical education and career pathways among the state's educational entities. Therefore, the Department of Public Instruction, the University of Wisconsin System, the Wisconsin Association of Independent Colleges and Universities, and the Wisconsin Technical College System committed to:

Support one another and work collaboratively to reduce or eliminate institutional barriers, foster and simplify transitions among institutions and systems, and expand Wisconsin's PK-16 career pathways aligned with and informed by labor market information in order to assist all Wisconsin students in pursuing and achieving their academic and career goals.

Another significant state-supported workforce development activity includes the development and expansion of career pathways. At the secondary level, efforts have focused on developing state-endorsed regional career pathways made possible by the JPMorgan Chase New Skills for Youth (NSFY) grant. The primary focus beginning in the 2019-20 school year is to expand the development and implementation of career pathways (which are currently offered in four pilot regions) that begin at the secondary level and progress to postsecondary education and career opportunities. The NSFY regional career pathway development process ensures that high schools connect to regional workforce and economic development efforts where career pathways feature high-skill, in-demand careers. These pathways are created in partnership with local workforce and economic development boards, technical colleges, and other regional stakeholders to provide school districts with a "ready-made" academic and career plan that includes:

- A sequence of courses;
- Work-based learning experiences;
- Industry-recognized certifications; and
- Opportunities to gain college credit.

At the postsecondary level, Wisconsin's technical colleges continue to work closely with employer, industry, and workforce development partners to ensure that programs are aligned directly with workforce needs and skills. Programs are developed and reviewed based on extensive labor market research and expertise from program advisory committees. Advisory committees consist of experts in the occupational field and local businesses to keep the program skills, competencies, and training updated with current and future needs (e.g., keeping pace with changing technologies and industry standards). WTCS also engages with DWD to deliver apprenticeship programs in high-demand, high-wage, and high-skill industry sectors.

DWD is organizationally positioned to strengthen the WIOA partnership with Registered Apprenticeship (RA). This partnership is aligned at the state level with RA participating in the development, review, and discussion of statewide WIOA policies. At the local level, Bureau of Apprenticeship Standards (BAS) Apprenticeship Training Representatives (ATRs) are partnering with local WDBs on several levels including the Business Services Team, services to applicants and in the local Job Centers.

The local WDBs sector planning and industry engagement alliances will play an important role in expanding apprenticeship into new occupational areas. The ATRs have been invited to the Employer Alliance meetings, as appropriate. ATRs provide training to local Job Center staff regarding apprenticeships and provide materials that job seekers may use to gauge their interest in apprenticeable occupations.

WIOA local staff and ATRs both use Job Center of Wisconsin (JCW) Business for communication purposes as it relates to outreach to employers. RA staff will engage apprentice sponsors to register with on ETPL. Wisconsin received an American Apprenticeship Grant as well as a State Apprenticeship Expansion Grant and the activities associated with these grants will position Wisconsin's WIOA and RA partnership far into the future.

Unemployment Insurance (UI) and Division of Employment and Training (DET) services are both under the umbrella of DWD. Although, each is a distinct Division within DWD, with different staff addressing specific Unemployment eligibility issues. Professional staff in each area communicates regularly and coordinate any UI law, program or service changes. Job Center staff notifies UI of eligibility issues when they arise; adjudicators are then notified to work directly with the claimant, either over the phone, or in person when possible.

Dialogue between UI and Job Service leadership results in shared and agreed upon best practices, training, and processes to assist in the parameters of eligibility issues and when it is best to work with UI staff. Training is provided when there are changes and/or eligibility issues that are to be addressed by Job Service and WIOA staff. In addition to specific training targeted to eligibility issues, step-by-step instructions are provided as well as information as to when UI must be called for eligibility issues for further consultation and adjudication. Written guidance letters and processes are available via webinars, conference calls, and informational printed materials.

## C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

The WIOA Leadership Team continues to meet to coordinate and align services provided by the Combined State Plan programs. System-wide policies are developed and routed by this leadership group to ensure all needs are considered and potential impacts are understood.

DWD created the Workforce Transformation Taskforce (WTT) to evaluate the current state of the workforce system and make recommendations to improve in the future. The WTT is comprised of representatives from DWD across several divisions, DOC, the local Workforce Development Boards, DCF, and DHS. By connecting partners across state agencies, the WTT intends to create a common understanding and work together to identify areas of coordination. There are five areas of focus under the WTT: (1) branding of the workforce system, (2) technology, (3) locations and accessibility, (4) referrals and staff training, and (5) business services. Through the use of expert presentations, research, and focus groups, each of these focus areas will be explored in-depth with the goal of providing recommendations to executive leadership at the respective state agencies. By bringing State Plan partners together, the WTT intends to create a comprehensive plan to better move the workforce system into the future in a coordinated effort.

Reemployment Services and Eligibility Assessment (RESEA): RESEA is an Unemployment Insurance (UI) program facilitated and delivered by Job Service staff within the Division of Employment and Training (DET). UI claimants who are required to search for work are also required to complete an online assessment (on JobCenterofWisconsin.com) designed to identify those with potential barriers to employment. Those claimants who would most benefit from an in-person RESEA orientation at a nearby job center can schedule themselves into available sessions using an online scheduling system.

RESEA claimants participate in an initial 3-hour group meeting where in-depth information about local Job Center and partner agency programs and services is provided. Immediately following the meeting, each claimant meets one-on-one with RESEA staff (state merit staff) to develop an employment plan, receive labor market information, and review their continued eligibility to receive UI benefits (e.g., work search review). All RESEA claimants are required to complete mandatory follow-up activities that support their employment plan before returning for a required subsequent RESEA meeting with staff. Activities can include: job seeking workshops, meeting with one of our licensed career counselors, and completing skill assessments or career interest inventories. In addition, claimants are referred to partner

organizations as appropriate, such as WIOA service providers, veterans services, vocational rehabilitation, etc.

Low-Income Individuals: WIOA Adult Priority of Service: The state has an adult priority of service policy for low-income individuals and those who are basic skills deficient. The WIOA Adult Priority of Service policy ensures that Wisconsin's WIOA Adult participants receive priority.

Wisconsin Works (W-2) is Wisconsin's primary Temporary Assistance for Needy Families work program and is a new combined PY2020-2023 State Plan partner. State level representatives from the Wisconsin Department of Children and Families will be added to the WIOA Leadership Team and its subcommittees to assist in policy development and the coordination of activities. Work has already begun on the state level to ensure that Title I and W-2 work experience policies are in alignment.

FoodShare Employment and Training (FSET) is Wisconsin's Supplemental Nutrition Assistance Program Employment and Training programs and is a new State Plan partner. Like DCF, state level representation from the DHS will be added to the WIOA Leadership Team and its subcommittees.

Numerous counties in the state of Wisconsin do not have a physical one-stop location. Wisconsin has 72 counties and 57 certified job centers. The ability to access services is critical to job seekers. Transportation poses an issue for many, especially in Wisconsin's rural areas. A focus of the Workforce Transformation Taskforce (WTT) is locations and accessibility.

Individuals with Disabilities: The Division of Vocational Rehabilitation (DVR) is responsible for the management and oversight of Title IV funds. DVR is committed to working with Combined Plan partners in supporting efforts to providing effective services to individuals with disabilities.

DVR has developed and established practical strategies to serve those who have disabilities. The state's WIOA Roundtables have included training sessions on these successful strategies and information sharing by partners, including DVR, available to all attendees. DVR will continue to participate in the development of training for State Plan partners such as the WIOA Roundtables.

DVR will also continue to consider collaborative agreements with state agency departments to target and increase paid on the job training (OJT) internship opportunities for DVR job seekers in state positions. This initiative is designed to access state limited term employment (LTE) positions to expand the number of state employment opportunities that contribute to the skills and work experience of persons with disabilities served by DVR. The goal of the OJT LTE paid internship is that upon successful completion, DVR sponsored interns will have valuable experiences and references for their resume and will be prepared to compete for available LTE or permanent state agency positions.

DVR is involved with job center partners in planning and coordinating services to youth and serves on local committees with workforce partners to focus on such areas as services to youth, youth apprenticeship (YA), and transition activities.

DVR will continue to encourage consumer referrals to Title II for improvement of skills. Moreover, DVR will continue to be involved with dual enrollment strategies at the local level, which helps to ensure individuals with disabilities who qualify for veteran or other programs are also co-enrolled in the respective programs. DVR refers individuals to certificate programs

offered by Title III, which increase credentialing opportunities for its consumers. These are recognized industry credential programs.

DCF operates Wisconsin's TANF Work Program (Wisconsin Works (W-2)), child support and childcare subsidy programs for low-income individuals and families. DVR and W-2 have established a MOU and Technical Assistance Guide to ensure that disabled individuals enrolled in both programs have coordinated case management, shared employment goals and overall service coordination. The purpose of the MOU is for DVR and DCF's Division of Family and Economic Security is to establish communication and a common understanding regarding the roles, policies, and procedures to improve services to common customers.

Youth: DVR, in collaboration with schools, serves students beginning as early as age 14 with Pre-Employment Transition Services (Pre-ETS). The five core services include:

1. Job Exploration Counseling
2. Work Based Learning
3. Counseling on Opportunities for Enrollment in Comprehensive Transition or Postsecondary Educational Programs at Institutions of Higher Education
4. Work Place Readiness Training
5. Instruction on Self-Advocacy including Peer Mentoring

Pre-ETS services available statewide to all students with disabilities in need of such services regardless if they have applied for or have been determined eligible to receive DVR services. A student is defined as someone with a disability who is in high school or in a secondary, postsecondary or other recognized education program and is 14 to 21 years old.

DCF funds Independent Living Services to youth placed in foster care. All children and youth need to learn basic life skills in order to become successful adults. For all youth in foster care, an assessment and plan gets developed to focus on education and career planning, money management, healthy relationships, safe secure housing, transportation, and community resources. Independent living services for youth ages 18-21, who are no longer in out-of-home care are also provided throughout the state by Transitional Resource Agencies. These services include training, education, health insurance, employment services, and housing counseling.

Veterans: Labor and employment services are provided to veterans at the state's job centers. The state has adopted a veteran's priority of service policy for all WIOA Title I programs (Adult, Dislocated Worker, and Youth). Job Center staff refer eligible veterans to appropriate WIOA-funded training programs and additional workforce programs such as Registered Apprenticeship (RA). In addition, the DWD's Office of Veterans Services employs Disabled Veteran Outreach Specialists (DVOP), Local Veteran Employment Specialists (LVER) and Consolidated DVOP/LVER staff that are integrated within the job centers of each of the 11 WDAs. This program is funded through the U.S. Department of Labor Veterans Employment and Training Service (VETS) Jobs for Veterans State Grant. Under the requirements of the grant, DVOPs provide individualized career services to all veterans identified as having a significant barrier to employment (SBE's) and other eligible individuals as identified in 38 USC 4103 (a)(1). Veterans populations identified as eligible to receive services from DVOP specialists include; Special disabled or disabled veterans, Homeless veterans as identified in Section 103 (a) of Stewart b. McKinney Homeless Assistance Act, recently separated veterans who have been unemployed for 27 or more weeks in the previous months, a veteran who is currently incarcerated or who has been released from incarceration, a veteran lacking a high school

diploma, a low income veteran ( as identified by WIOA Section 3 (36), Viet Nam Era Veterans. Veterans between the ages of 18 and 24 that would benefit from individualized career services and transitioning services members , spouses and caregivers who have been identified as in need of individualized career services, members of the armed forces who are wounded, ill or injured and receiving treatment in military treatment facilities or warrior units by and their spouses or other family caregivers of such wounded, ill or injured members.

DVOPs provide comprehensive assessment, career guidance services, individual employment plans (IEPs), staff assisted services, and Labor Market Information (LMI). DVOPs use a case managed approach to serving veterans and other eligible. They also conduct outreach outside of the job centers to reach SBEs and other eligible.

The OVES LVERs will continue to serve as members of the local Business Services Team. LVERs are capacity builders that work with local area employers and community organizations. LVERs promote what veterans bring to the workforce and assist employers by connecting them to qualified veterans. LVERs serve as active participants in each WDA on the business service teams.

Adult Learners: The Wisconsin Technical College System (WTCS) is responsible for the management and oversight of Title II funds. WTCS will work with the Combined State Plan partners to ensure the effective delivery of career pathways in the state. WTCS will convene regular meetings of the Wisconsin Career Pathways Committee, which includes representation from Combined State Plan partners and key stakeholders, to share information and plan. Over the course of this State Plan, a focus of the committee will be to increase awareness of career pathways to businesses.

WTCS will also continue to participate in professional development activities that bring together Title II providers with workforce. WTCS has actively participated in the planning of all WIOA Roundtable professional development events and encourages adult education faculty and staff to attend. WTCS will remain an active partner for professional development and training on WIOA in the future.

Ex-Offenders: DWD collaborated with the Department of Corrections (DOC) and the Workforce Development Board of South Central Wisconsin (WDBSCW) to establish a job center at Oakhill Correctional Institution (OCI). OCI is a minimum-security state correctional facility located in Oregon, WI with an average daily population of 760 individuals. The OCI Job Center is in the school building inside the institution and is operational approximately 25 hours per week with staff from DWD and the WDBSCW providing direct services to inmates. DWD and WDBSCW contracted staff provide access to a host of programs and services, including: career readiness programs, job search assistance, resume development, services for veterans, registered apprenticeships, and assistance for individuals with disabilities.

Innovation is key to develop a new project or to produce a revolution of change. This is the first-of-its-kind job center in a correctional institution in Wisconsin and it provides inmates with the opportunity to create legitimate Job Center of Wisconsin (JCW) accounts to search for jobs, develop resumes, and apply for employment opportunities in the community. This is a level of internet access (for the purposes of preparing for post-release employment) that inmates otherwise do not have. It additionally allows for a continuity of service from pre-release to post-release and an integration of reentry and workforce services.

DOC also partnered with several inmates from OCI who have an interest in graphic design and artistic design. With this partnership, two inmates assisted in the facility creation of artwork

and paintings that adorn the OCI Job Center, creating an inviting environment for all that participate.

The OCI Job Center is the first of its kind in Wisconsin. Since the project is a pilot, data and information to understand the return on investment is key. Data from this project will be gathered to determine if the project:

- Better prepares inmates for release to the community;
- Assists inmates in obtaining and maintaining employment upon release; and
- Positively impacts recidivism rates.

Currently, the Wisconsin Development Board of South Central Wisconsin aligns workforce training in the correctional system with the Windows to Work program. This state level Oakhill Job Center initiative by DWD & DOC is benefiting the Windows to Work program participants by providing another pre-release preparation environment. This environment enables them to begin their employment search efforts and apply for jobs prior to their release.

This pilot allows us to provide direct services to a sub-section of the population that we were previously limited in our ability to serve. To mitigate risk, we have adjusted our service delivery model such that we provide inmates with a limited set of functionalities through the Job Center of Wisconsin. The ability for these customers to change their email address, communicate through the application, etc. has been restricted. We have also had to reevaluate certain components of account management, such as password resets and forgotten usernames, to be able to serve inmates who only have a limited amount of time in the job center.

In order to better serve these customers moving forward, we will make further changes to our labor market exchange website (JCW), as well as our internal case management system (ASSET), so that we can group these individuals separately from our "standard" job seekers. We will coordinate additional training for our IT Support Center so that they know how to handle account management-related requests from users in this group.

DWD and DOC collaborated to open a second correctional job center at the Wisconsin's maximum women's prison, Taycheedah Correctional Institution in Fond du Lac. The same services and programs offered at Oakhill was integrated into the Taycheedah facility as well. In the upcoming months, DWD and DOC opened two additional job centers in 2019. In the 2020 calendar year, three to four more correctional job centers will be opened.

DWD and DOC also partner on other job training opportunities in the correctional facilities such as technical skills training through WTCS and the state's 16 technical colleges. Recently, training programs in CNC, welding, and industrial maintenance were conducted at several correctional institutions. Two mobile career labs were added to the mix of training opportunities. One mobile career lab is located at Taycheedah Correctional Institution, offering eight inmates in each cohort career training on welding equipment and simulators. Upon completion of their welding lab training, the inmates will receive a technical certificate from Moraine Park Technical College. This lab will be shared with Kettle Moraine Correctional Institution in calendar year 2020. Additionally, the Electro-Mechanical Mobile Career Lab is offering eight to ten inmates at Jackson Correctional Institution the opportunity to train and receive a technical certificate from Western Technical College. This lab will be shared with New Lisbon Correctional Institution in calendar year 2020. To create a holistic approach to our correctional job centers, DWD and DOC are looking to partner with additional state agencies such as the DCF and DHS to provide additional resources to inmates prior to their release.

The Bureau of Apprenticeship Standards (BAS) at DWD has created registered apprenticeship programs and certified pre-apprenticeship programs in correctional institutions that better prepare the inmates upon release. BAS has been working with the Apprenticeship Council to establish new apprenticeship programming in addition to pre-apprenticeship course options for pathways of success.

DWD was awarded a $100,000 Fidelity Bonding Demonstration Grant from the U.S. Department of Labor (DOL) Employment and Training Administration (ETA) in June 2019. The grant funds will be used to purchase fidelity bonds to assist former offenders obtain employment, including former offenders recovering from opioid and other drug addictions. Fidelity bonds are business insurance policies that protect employers in case of any loss of money or property due to employee dishonesty. It gives an employer assurance that the hired former offender will not be a risk to the employer. DWD's fidelity bonding program plans to serve 1,000 additional former offenders over four years with the grant funding.

Migrant and Seasonal Farmworkers: The Migrant and Seasonal Farmworker program is administered by the DWD Job Service Bureau (Job Service). Job Service ensures that migrant and seasonal farm workers (MSFW) receive the full range of career and supportive services, benefits and protections, and job and training referral services that are provided to non-MSFWs.

The State Monitor Advocate will continue to provide technical assistance to the local workforce development areas and staff to ensure full program compliance.

Refugee Services: DCF's Refugee Programs Section (RPS) administers refugee serving programs in partnership with local contractors in Wisconsin. Contracted partner agencies include local refugee resettlement agencies, language and literacy service providers, private clinics, public health departments, mental health service providers, W-2 agencies, school districts, and other community-based or private non-profit organizations. These contracted partners provide direct services and supportive resources such as physical health and mental health screenings, health education and health care access services, English as a Second Language instruction, case management, job services and employability skills development, citizenship classes and immigration services, cultural orientation, and services for specific subgroups such as older refugees with specific needs, refugee children enrolled in K-12 school, and refugee youth and young adults. With funding from the Federal Office of Refugee Resettlement, the RPS administers income support programs for refugees which provides cash and medical assistance for up to eight months after a refugee's arrival. The Refugee Cash Assistance program provides cash benefits to refugees who do not qualify for W-2. The Refugee Medical Assistance program provides a basic level of health care to refugees who do not qualify for Medicaid or BadgerCare Plus.

Trauma-Informed Care: Wisconsin will also work to increase staff awareness of the lasting impacts of life experiences (e.g. poverty, family illness, addiction, violence) that influence customer success. Bringing Trauma Informed Care practices and methods into our Job Centers, improves our approach working with the people accessing our programs. When we recognize that educational and economic success requires that we address and interrupt trauma, we create services and learning environments that support customers holistically. DWD will make available to all frontline partners staff training on Trauma-Informed Care through Cornerstone.

The Wisconsin Technical College System ensures eligible participants are referred to emergency funds and other resources that assist with transportation challenges, housing insecurity, food insecurity, daycare needs, and assist in navigating community and employer supports to ensure that they achieve their educational and employment goals.

In 2016, the Wisconsin Department of Corrections (DOC) formed the DOC Trauma Informed Care (TIC) Core Implementation Team (CIT) which serves as the agency's oversight group. This CIT has representatives from all four Divisions, Office of the Secretary, a Community Agency and a representative with lived experiences. Over the past several years, the Department began to understand and incorporate the trauma informed care evidence and research into services for our staff, who are impacted by the effects of trauma including secondary and vicarious trauma. This action plan covers our focus for the next two years.

The Bureau of Job Service is committed to the practice of Trauma Informed Care in the clients and customers utilizing our programs and services throughout the state. Our career counselors have been trained in Trauma Informed Care. Several staff participate in ongoing regional TIC meetings in their districts, and we have dual representation on the State Trauma Informed Care Consortium. Soon, our career counselors will be training TIC basics to staff in their districts to continue sharing the knowledge and benefits of TIC.

## D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

Wisconsin's Business Services Teams (BST) coordinate activities and resources with WIOA core and Combined State Plan programs to provide comprehensive, high-quality, customer-centered services to employers. The core programs and Combined State Plan partners meet regularly and collaborate to ensure that employers receive the best services available to them. Teams provide services that include, but are not limited to: recruitment, human resources consultation, workforce incentive information, and resources, training programs, tailored labor market information, and access to a deep labor pool.

Representatives on each BST include a representative of the Workforce Development Board, Bureau of Job Service, Division of Vocational Rehabilitation, Registered Apprenticeship, Office of Veterans' Employment Services and other WIOA partners programs as required or deemed necessary by local teams. WTCS and Title II are active JCW partners serving adult education, literacy and other education and training needs, often in coordination with Title I and employer partners, across the state; TANF and FSET local staff are represented where the programs are co-located.

DVR has 12 Business Service Consultants (BSCs) and one Policy Initiative Advisor who work to align business outreach strategies in a tiered approach, focusing on national (National Employment Team, or NET), state (such as energy sector), and regional business needs and initiatives. Strategic business outreach and relationship development, whenever possible, includes Combined State Plan partners in a coordinated effort to provide seamless, cohesive services to Wisconsin businesses. Title I, III, and IV work collaboratively at the state level to coordinate business workforce initiatives. Title I, III and IV business service representatives complement each other's skill sets to best serve business establishments in Wisconsin; for example, Title IV has specific knowledge and resources related to job seekers with disabilities, while Title III has business initiatives and services, such as apprenticeship, they are skilled in.

Wisconsin identified JCW Business as the system of record for all business services reporting and business customer management. Any user from a WIOA core or partner program with a demonstrated business need may access the system. Specifying a single tracking system reduces repetitive employer contacts and promotes collaborative business services.

Information entered and tracked in JCW Business informs and guides services focused on employer's specific needs. In addition, the skills matching functions of the JobCenterofWisconsin.com (JCW) tool provide great benefit to employers searching for

candidates. Enhanced, user-friendly LMI tools available through JCW provide a resource for employers seeking to fill openings.

Real-time reporting from JCW Business is available within the robust capabilities of the Business Intelligence platform, allowing for data-informed decision making.

The WIOA Performance Advisory Committee (PAC) monitors and analyzes the baseline results of the pilot Effectiveness in Serving Employers measure to develop negotiated performance measures and provide feedback to local business service teams for continuous improvement. Wisconsin selected "Employer Penetration Rate" and "Repeat Customer Rate" as the two pilot performance measures.

In addition, the PAC researched and piloted additional measures focused on quality service delivery, sector strategies, and assisting employers in accessing untapped labor pools.

Title II (AEFLA) programs play a pivotal role in serving Wisconsin employers by delivering a talent pipeline that is responsive to workforce and industry needs. The supply of skilled labor to Wisconsin employers through Wisconsin Title II program efforts is most clearly exhibited in Corrections/Re-Entry Education, Integrated Education and Training (IET) and Integrated English Literacy and Civics Education (IELCE). These service delivery models are informed by the analysis of regional labor market data, designed through ongoing collaborative activities with regional employers and local workforce development boards, and maintained to ensure industry relevancy through modification activities. The success of these programs is possible through the participant support and collaboration with other critical WIOA partners including DOC, TANF and DHS. Collectively, these intentional efforts will ensure that Re-Entry Education, IET and IELCE offerings provide employers with skilled labor to address their workforce needs and prepare AEFLA participants with industry-driven education and training.

Title II funded Corrections/Re-Entry, IET and IELCE programs are approved by the WTCS Office and require vetting through a labor market needs assessment to ensure the offering is designed to prepare adults for employment in in-demand industries and occupations. The needs assessment process includes the collection, analysis, and synthesis of regional employer and local workforce development board input. Needs assessment data is collected through surveys, focus sessions, or discussions with other education and workforce system partners. Additionally, each offering will be aligned with at least one occupational classification code from the Department of Labor's Standard Occupational Classification (SOC) system. Together, coordination with workforce system partners, regional employers, and alignment with the SOC system will support intentionality of Corrections/Re-Entry, IET and IELCE programs to ensure gainful employment for participants.

Title II providers of IET and IELCE collaborate with workforce system partners and regional employers to design curriculum and integrate the appropriate workforce preparation activities. Curriculum design efforts informed by workforce partners will ensure learning activities provide participants with occupation specific knowledge, skills, and abilities that are vital for employability upon exit from the program. Through the curriculum design process with workforce system partners, IET and IELCE participants will have the employability skills to address employer workforce needs.

Once an IET or IELCE offering is fully implemented and enrolling participants, employer partners will continue to be engaged through the IET and IELCE modification process. In addition, Title II providers will coordinate annual review activities with workforce system partners to verify continued relevancy of Corrections/Re-Entry programming in relation to the regional needs of labor and industry.

The WTCS Office coordinates a competitive multi-year grant cycle to award monies for Title II local providers. Within these grants, funds are designated for intentional efforts to scale employer-responsive Corrections/Re-Entry, IET and IELCE across the state.

Wisconsin is also exploring establishing a committee comprised of core and partner programs that provide business services. The committee would drive statewide business services strategy, policy process, and provide joint guidance to core and partner programs. The WIOA Leadership Team will designate a program lead to assemble and convene the committee.

## E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Governor Evers' appointment of educational leadership in Wisconsin to CWI is the cornerstone of the state's engagement with educational institutions through the workforce development system. Current members are the President of the WTCS, the State Superintendent of DPI, the President of the University of Wisconsin System (UWS), and the President of the Wisconsin Association of Independent Colleges and Universities (WAICU).

Wisconsin supports the development of integrated education and training (IET) programs as part of its broader Career Pathways initiative. The initiative is a partnership between the Department of Workforce Development and the Wisconsin Technical College System. It was originally launched with private grant funding and is now supported with state and federal WIOA funds. The Career Pathways model is a comprehensive initiative that supports aligning regional partnerships, sector-based programs, and state systems. It brings industry-driven career pathways to scale throughout the state and provides new career ladder footholds to low-wage workers with limited skills. The required partners for a Career Pathway project include at least one technical college district and one workforce development board. Additional partners may participate.

## F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

Wisconsin's primary strategy for engaging education and training providers in the workforce development system is to align its ETPL eligibility criteria with indicators of quality that are relevant to training providers doing business in the state. Examples of avenues for training providers to satisfy Wisconsin's ETPL eligibility include being:

- accredited by an accrediting organization recognized by the Council for Higher Education Accreditation (CHEA). CHEA recognizes the Higher Learning Commission, which currently accredits 74 institutions of higher education in Wisconsin, including Wisconsin's technical colleges and the University of Wisconsin System.
- approved by the Wisconsin Education Approval Program (EAP), which is administered by the Wisconsin Department of Safety and Professional Services (DSPS).
- a registered apprenticeship approved by the Wisconsin Department of Workforce Development's (DWD) Bureau of Apprenticeship Standards (BAS).
- a pre-apprenticeship certified by the Wisconsin Apprenticeship Advisory Council.
- a barbering, cosmetology, real estate, or certified nursing assistant training programs approved by the Wisconsin Department of Health Services (DHS) or DSPS.
- a Community Based Residential Facilities (CBRFs) program with instructor(s) approved by the Wisconsin DHS through University of Wisconsin-Green Bay.

## G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Executive Order 152 requires the Council on Workforce Investment to recommend strategies that align workforce development resources to support economic development and the development of career pathways that support high-demand industry sectors.

Priority III of the Council on Workforce Investment 2018-2022 Strategic Plan is to Increase Awareness and Expand Worker Training Programs, Internships, and Apprenticeships. The Council recommends doing this by supporting the full deployment of DPIs Inspire Program, expanding Registered Apprentice and internship opportunities, and aligning Youth Apprenticeship with Registered Apprenticeship.

2013 Wisconsin Act 9 created the Wisconsin Fast Forward (WFF) initiative. DWD's Office of Skills Development (OSD) administers the program by providing technical assistance to, and serves as a resource for, Wisconsin employers experiencing a need for skilled workers. The intent of the program is to provide funds for training programs to employers in response to a documented skill need not currently addressed by other training programs.

WFF was expanded in March 2016 (2015 Wisconsin Act 283) to increase the number of college students participating in internships with Wisconsin companies. The 2017-19 biennial budget expanded the program again to assist school-to-skilled work initiatives. This includes funding partnerships with Wisconsin technical colleges and local school districts to ensure teachers are appropriately credentialed to offer students advanced level coursework that counts as college and technical college credit. In addition, funding was provided for dual enrollment program and advanced manufacturing technical education equipment.

Relationships between WIOA-administering agencies, DWD and WTCS, and DPI ensure that investments enhance access to workforce development programs. While developing the state's program guidance on the Title I-B programs, DET collaborated on strategies to serve the now-prioritized population of "out of school youth." The strategies outlined in the I-B policy guidance to ensure education access were developed with the knowledgeable counsel of DPI and are referenced below.

"In order to comply with the State's compulsory attendance law, and WIOA's priority and noninterference requirement, youth at an age where they are required to attend school, do not have an exception to the regular school attendance as outlined in Wis. Stat. sec 118.15(3), or have not graduated, may be served as an out-of-school youth, if the WDB makes school attendance a priority and provides services outside of the regular school day.

Through the ISS, the WDB makes school attendance a priority by providing services that direct a youth back to school. The first goal of the ISS must be to have the youth return to school. The board can also provide services that encourage regular school attendance, such as counseling, tutoring, or exploring career options, as well as dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent.

Services provided to out-of-school youth must be provided outside of the regular school day for youth who are not 18 and have not graduated unless the service is returning to school. For purposes of compliance with the law, a regular school schedule is the days and times during which school is normally held as set by the school district board."

Both the Wisconsin Technical College System (WTCS) and Department of Public Instruction (DPI) are committed and driven to increase equity in student success and the employment outcomes of our students. The Federal Perkins V Re-authorization and State Plan outlines the goals for career and technical education in Wisconsin:

- Increase postsecondary credential attainment, so that 60% of Wisconsinites ages 25-64 have a postsecondary degree or credential of value by 2027.
- Eliminate equity gaps in credential attainment across student race/ethnicity groups and special populations.

Moving forward, WTCS and DPI will leverage the Strengthening Career and Technical Education for the 21st Century Act (Perkins) to advance student equity and educational attainment. During this four-year plan, the agencies will:

Increase the number of students who have access to high quality career pathways starting in high school and address the barriers to participation and completion.

- Leverage Perkins funding to provide targeted supports and district-wide reforms that will help close educational attainment gaps, specifically for students of color, students with disabilities and students from low socioeconomic backgrounds.
- Promote and expand education opportunities for communities who have been historically underserved in Wisconsin. For example, the WTCS is collaborating with the Waukesha County judicial system to create a pilot 'Education Court' that will provide an alternative form of sentencing that focuses on identifying and addressing offender education gaps, assessing career goals, and other requirements focused on reducing recidivism rates and successful re-entry and employment, with necessary supervision and guidance (see page 19).
- Continue to leverage data used for Perkins reporting to identify equity gaps and explore potential causes and interventions to eliminate these gaps in student success.
- Continue to collaborate with stakeholders (employers, community organizations, etc.) to increase dual enrollment offerings, bridges to postsecondary education, expand work-based learning and apprenticeship opportunities, and enhance student success and awareness of career and technical education opportunities.

DPI and DWD jointly administer and manage the CTE Incentive Grants (Wis. State Statute 106.273) for high school students that graduate and complete an industry-recognized credential from a list of approved certifications. Prorated funding is distributed annually to qualified claims. Funding is intended to support programming that results in students earning these workforce desired credentials. Recently, this funding expanded to provide for sum sufficient amounts of $1000 to districts and $500 to students for licensure in EMT, EMR, and Firefighter.

Other career pathway/industry growth supporting grants that have been passed (although not necessarily with DWD):

- Robotics League Participation- https://dpi.wi.gov/stem/grants/robotic-league
- Microsoft Academy- https://dpi.wi.gov/imagine-academy
- Fab Labs through WEDC- https://wedc.org/programs-and-resources/fabrication-laboratories-grant/

**Alignment to Labor Market Needs**

<u>Secondary</u>

The Wisconsin Department of Workforce Development (DWD) has developed an active labor market information website called Wisconomy. The website hosts a specific tool for local

education agencies (LEAs) to access state, region, and county labor market data in an easy-to-understand format. This tool allows LEAs to further evaluate relevance of CTE programs with local or regional workforce and economic partners.

In collaboration with DWD, DPI will create and publish a labor market information (LMI) guide for use by secondary eligible recipients. If a locally developed career pathway is in place, or is developed, that is not part of the state identified in-demand industry sectors, then additional rationale informed by local businesses will be required for career pathway approval.

ACP requirements in high school grades must also include student access to accurate national, regional, and state labor market information, including labor market supply and demand. As part of this requirement, DPI is providing an online, virtual training module for LEA staff, students, and families to understand LMI and utilize it in career decision-making.

Postsecondary

WTCS ensures that CTE programs are aligned with state, regional, or local labor market needs via the (1) program approval and annual review process and (2) outcomes-based funding. As part of program approval and annual review processes (outlined in the Educational Services Manual), eligible recipients provide a comprehensive analysis of labor market information using data from Economic Modeling Specialists Intl. (EMSI), Bureau of Labor Statistics (BLS) or Department of Workforce Development's (DWD) Wisconomy dashboards. For new and emerging occupations, eligible recipients supplement quantitative labor market data with results from surveys, interviews and advisory committee focus groups. Within this analysis, eligible recipients address labor market demands and projections, how these demands may be met by similar programs that are already offered at the college or neighboring districts, and the necessary level of education and skills required for workers in these in-demand fields. In addition, as part of outcomes-based funding, eligible recipients receive funds based on the number of degrees and certificates awarded in high-demand fields. High-demand fields are the top 50 occupations (both new jobs and replacement jobs) identified in DWD's statewide long-term occupational projections for which the technical colleges provide training. The occupations identified as high-demand fields are then matched with the appropriate WTCS programs. The list of high-demand fields is updated every two years as DWD updates its projections.

## H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

*Career Pathways*

Wisconsin's career pathways provide opportunities for entry and exit at multiple points along the paths to ensure that students credentials are portable and transferable. Title II programs are aligned within these pathways and include secondary completion and basic skills transitioning directly to postsecondary coursework (concurrently in early courses) and, in many cases, resulting in postsecondary credential attainment. The Wisconsin Technical College System (WTCS) offers industry recognized certificates through direct business and industry services as well as through long- and short-term educational program. Every state-approved pathway certificate or technical diploma is based on industry needs with direct industry support. Where applicable, students will earn industry recognized certificates simultaneously with their educational degrees. Short term technical diplomas are often built to ladder into longer term technical diplomas or associate degrees with advanced job outcomes.

The career pathway development process includes the collection, analysis, and synthesis of district employer feedback via focus groups or surveys and rigorous labor market analysis of occupational projections through secondary labor market data. Regional employers assist in the

design of the curriculum within each career pathway. This important alignment step ensures that the curriculum is designed to provide students experience with occupation specific technology and build knowledge, skills, and abilities that are vital for employability upon graduation. Once a career pathway is fully implemented, employers engage in the program modification process via program advisory committees and program reviews to verify pathway relevancy in relation to the pace of change in the workplace and industry. Collectively, these activities ensure that Title II and other WIOA partners are responsive to local workforce needs.

*Improving Access*

During the 2014-15 year, over 200 approved embedded credentials were offered within the WTCS. This number nearly doubled by the 2018-19 year with over 400 WTCS approved embedded credentials offered. The growth in embedded credential offerings is attributed to a strategy for scaling career pathways and efforts to implement local pathways. To build a system-wide understanding of purposeful embedded credential career pathways, the WTCS Office coordinated a day long Career Pathways Bootcamp in 2014 and communicated the approval process for embedded credential career pathways.

WTCS utilizes Title II providers, in collaboration with other WIOA partners (e.g. Title I) and employers to increase use of these short-term, stackable credentials. Examples of these opportunities include increased scaling and use of Integrated Education and Training, and the submission to the Department of Education for a recognized Ability to Benefit State plan in 2019 which would allow Title IV funding for eligible adult learners, allowing eligible Title II participants simultaneous completion of a high school equivalency credential while enrolling in occupational training.

Title II alignment within career pathways has led to seamless transition to postsecondary education for over 52% of participants within the current program year or subsequent year. These short-term credential offerings materialize positive outcomes for students. Historically, over one-half of all new students enrolled in a WTCS embedded credential complete the credential within the year, allowing completers to quickly build their skills and enter the labor market - or continue on to the next credential within the pathway. The scaling of career pathways has led to nearly 9,000 WTCS embedded credentials being awarded in the 2018-19 year alone.

WTCS Embedded Technical Diploma Career Pathway Employment Outcomes

*Registered Apprenticeship (RA)*

The Wisconsin Bureau of Apprenticeship Standards (BAS), with assistance from DOL-administered grants, continues to expand registered apprenticeship programs into in-demand sectors such as financial services, information technology, healthcare and advanced manufacturing. In recent years, BAS has overseen the creation of new occupations such as arborist, mechatronics technician, data analyst, software developer, and financial planner, to name a few.

The Wisconsin Technical College System (WTCS) ensures rigorous and relevant classroom related instruction to support on-the-job learning in registered apprenticeship, providing related instruction for the majority of apprenticeship programs in Wisconsin. WTCS ensures colleges have the funds and resources required to deliver apprenticeship instruction in the areas industry needs it most. College instructors engage along-side subject matter experts with BAS to develop course curriculum in existing and emerging fields. WTCS supports ongoing

curriculum development to ensure industry relevancy and engages students and industries in local communities. With more than 40 active instructional programs, WTCS had over 7500 enrolled apprentices in the 2019-20 school year, keeping completers on the path to higher wages and success. As BAS grows registered apprenticeship in Wisconsin, WTCS colleges continue to partner to provide apprentices with related instruction and additional opportunities, including applying completed apprenticeship credentials towards a earning an associate degree.

In late 2019 and early 2020, BAS plans to complete the development of additional registered apprenticeship occupations, including medical assistant, community health worker, pharmacy technician and broadband technician. To create such programs, BAS has forged new partnerships with burgeoning industries while building on its existing relationships, such as with the technical college system. BAS plans to wield this model and keep growing the footprint of registered apprenticeship in the state with the promise of middle-class wages to even more sectors. As the recent recipient of another DOL grant, BAS will target the transportation sector, which has exhibited high-growth in the state and is forecasted to maintain such growth. As it works with business and trade groups within the transportation sector, BAS is exploring the addition of the following occupations to the registered apprenticeship program: diesel mechanic, automotive mechanic, autobody collision technician, and automotive repair and service estimator.

Coupled with the strategy of the expansion of Registered Apprenticeship occupations in Wisconsin, BAS will make a concerted effort to promote the benefits of WIOA to its program sponsors and participants with the aim of enlisting such sponsors to the ETPL through an education and outreach campaign. Greater accessibility to critical WIOA resources for apprentices and pre-apprentices can only work to make registered apprenticeships and pre-apprenticeships more accessible meanwhile increasing the likelihood that apprentices and pre-apprentices that embark on such career pathways are able to successfully pursue them. In addition, BAS is working to expand the number of certified pre-apprenticeship programs in the state—especially those that feed into high-demand registered apprenticeship programs, such as in construction and manufacturing—and certify and create new pre-apprenticeship programs that serve the needs of industry. Not only do these pre-apprenticeship programs provide pools of qualified applicants for sponsors of registered apprenticeship programs, but they also help to bring such opportunities to populations generally underrepresented in registered apprenticeship, such as minorities, women, and ex-offenders.

Aside from Certified Pre-apprenticeship programs, Wisconsin's Youth Apprenticeship program may serve as an introduction to Registered Apprenticeship. BAS is amidst an ongoing effort to bridge the competencies learned in Youth Apprenticeship programs to their corresponding Registered Apprenticeship program and help employers understand the similarities and differences. Through the bridge program, crosswalks are created to assist the youth apprentices in obtaining work and educational credit toward a Registered Apprenticeship program, if they choose to remain in the trade after high school. Moving forward, BAS hopes to bridge additional programs to create a more stable long-term career pathway for both students and employers in each industry, including in the health, information technology, finance, and transportation sectors.

Under the Apprenticeship State Expansion (ASE) grant, BAS will be creating two navigator roles. These roles will be located in the Southeast part of the state as well as additional navigators at the South Central Workforce Development Board and the North Central Workforce Development Board. These navigators are anticipated to be the connection to the BAS as well as

the public workforce system. In the federal grants received, BAS identified goals and activities to become more involved with the workforce system to assist job seekers and customers with learning about registered apprenticeship.

Upon successful completion of a Wisconsin Registered Apprenticeship, all participants receive a Completion Certificate as well as a Journeyworker card that is portable across the United States and its territories. This Journeyworker credential is for the life of the registered apprenticeship completer. Some registered apprenticeship occupations allow the apprentice to receive 39 college credits towards a Journeyworkers Associates Degree upon completion; creating a stackable credential. Historically, this pathway has been used by those seeking to have an additional credential as a way of moving up within their respective field. Wisconsin Apprenticeship is seeking to make this pathway a more common pathway for registered apprentice participants by partnering with WTCS to embed the Technical Diploma and/or Associates Degree classes into the registered apprenticeship related instruction curriculum. Participants in Youth Apprenticeship and Certified Pre-apprenticeship also receive respected credentials in the Wisconsin Apprenticeship system. These credentials signify the participation and allow the participant to receive advanced standing credit towards their Registered Apprenticeship; this credit can shorten the apprentices respective registered apprenticeship program as well as allow the apprentice to start at a higher wage scale.

DVR Financial Assistance for Training

The state VR program has developed several strategies and programs that have improved access to recognized postsecondary credentials. DVR has issued helpful guidance to its staff to provide step-by-step instructions to explore postsecondary education programs with customers. DVR has also established a funding procedure in partnership directly with in-state postsecondary financial aid offices to process DVR financial assistance for training that considers financial aid in the calculations as a comparable benefit. Customers can receive DVR financial assistance for up to $5,000 per year to assist with costs of postsecondary education tuition. DVR also makes referrals to technical college Career Pathways programs and to adult and youth apprenticeship programs and coordinates services with the DET for those participating consumers.

## I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

DWD continues to work closely with the Wisconsin Economic Development Corporation (WEDC) to attract military veterans their spouses to consider moving to and working in Wisconsin when exiting the military. DWD and WEDC staff attend military summits at bases throughout the country to advise customers of the great benefits afforded to veterans who choose to live and work in Wisconsin. DWD has also been working with WEDC on military spouse hiring initiatives to raise awareness of the value/workforce the spouses bring for employers.

DWD works closely with WEDC on their Think-Make-Happen/In Wisconsin initiative and have collaborated with them to provide job opening information through a web service so WEDC can help promote our business customer needs through their website and local searching mechanisms.

WEDC is also going to work closely with DWD on its Employer Vet Ready initiative as we identify employers who have been deemed vet ready. They will be participating on our evaluation committee.

DWD's Labor Market Information area provides detailed LMI data to state and local economic development agencies as requested to assist with their needs in working with current and/or potential businesses.

DWD is involved with local partners to help provide guidance/direction for 'regional' planning beyond the traditional WDA boundaries. Local economic entities are involved in these discussions.

DWD's Wisconsin Fast Forward program is a grant program for employer-led, customized worker training projects. The intent is to provide essential assistance that cannot be met through an existing program. Grants will be awarded to maximize the impact of funds in catalyzing local collaboration and encouraging the development of sustained pipelines that directly align with employer needs. The jobs of the 21st-century economy depend on these training programs.

Locally, all 11 local WDBs coordinate with economic development entities, strategies, and activities. Due to boundary lines that do not perfectly match those of the local WDAs, Wisconsin WDBs have become adept at working with multiple economic development entities and serve as a resource to these organizations.

## B. STATE OPERATING SYSTEMS AND POLICIES

JobCenterofWisconsin.com (JCW): JCW is the state's labor exchange system. It allows job seekers and employers to enter work registrations, resumes, and job orders directly into the statewide database via the Internet. JCW uses a skill-based job matching system. JCW has information on workforce events around the state, the Eligible Training Programs List, Unemployment Information, Veterans Services and Wis.JobsforVets, and labor market information.

Automated System Support for Employment and Training (ASSET): ASSET supports the Workforce Innovation and Opportunity Act (WIOA) programs - encompassing Title I Adult, Dislocated Worker, and Youth programs and Title III Wagner-Peyser funded labor exchange services including case-managed services to Veterans, Migrant Seasonal Farm Workers (MSFWs), Unemployment Insurance (UI) Claimants, and Older Workers. ASSET also supports reporting for specialized Dislocated Worker programs such as Trade Adjustment Assistance (TAA), and National Dislocated Worker Grants (NDWG). ASSET is used for federal reporting and state and local program management:

- Federal Reporting: ASSET is the sole source of information about our Title I-B and Wagner-Peyser program customers. The registrations and services reported in ASSET are used to create the mandatory federal reports, which in turn, provide Wisconsin with continued federal funding for these programs.
- State Program Management: ASSET information is the sole source of data about individuals eligible for WIOA and other programs. DWD uses this information for resource planning, monitoring and evaluation, and general program management.
- Local Program Management: Data from ASSET can be used for making decisions on resource allocation, program management, or service options by local WDBs and Job Service districts. Additionally, local agency case managers can use ASSET to better serve their customers by giving them a statewide system that tracks customers wherever services are provided.

Comprehensive Planning Tool Kit (CEPT): CEPT houses useful interconnected tools to help career planners and other Job Center staff work with job seekers and program participants. The CEPT application tools complement ASSET case management. Job seekers can find versions of these tools by logging onto their Job Center of Wisconsin account and navigating to My JCW. Through CEPT, career planners can perform self-sufficiency calculations, create employment plans, assign action steps, and much more.

Sharing Of Local Area Resources (SOLAR): SOLAR is a web-based application that supports state, local boards, and partners so they meet the requirements under the Workforce Innovation and Opportunity Act (WIOA) to enter a Memorandum of Understanding (MOU). The MOU describes the operation of the one-stop delivery system, sharing and allocation of costs among one-stop partners in accordance with WIOA law, WIOA regulations and the Federal Cost Principles contained in the Uniform Administrative Requirements and Audit Requirements for Federal Awards. SOLAR is used to:

- Create and edit job center budgets;
- Attach supporting documentation;
- Access the MOU template; and
- Reconcile actual expenses.

WisConomy: WisConomy is the state's online source for economic and labor market information. WisConomy integrates functionality with JobCenterofWisconsin.com (JCW), the state's online public labor exchange that connects employers and job seekers, and with JCW's customizable MyLMI, labor market information page that launched in 2016. Through this integration, WisConomy.com will help further inform and drive employment decisions for users who search for job candidates and openings on JobCenterofWisconsin.com. WTCS and Title II providers utilize WisConomy for state and regional labor market information and program development.

Client Assistance for Re-employment and Economic Support (CARES): CARES is Wisconsin's automated system for determining eligibility in the administration of federal and state public assistance programs at the State level for the Department of Health Services (DHS) and the Department of Children and Families (DCF). The programs include Wisconsin's Health Care programs (Medicaid, BadgerCare Plus and SeniorCare), Supplemental Nutrition Assistance Program (FoodShare), Temporary Assistance for Needy Families program (Wisconsin Works/W-2), and Child Care program (Wisconsin Shares).

CARES provides a broad array of automation to support the delivery of multiple programs through both public and private entities across 150 physical locations and 8,000 users. CARES records transactional data used in the eligibility determination of SNAP, Medicaid, Child Care, and TANF programs in Wisconsin. More specifically, CARES includes data in the following categories: demographics, non-financial information, financial information, benefit issuance, program participation, program integrity, and agency performance. CARES provides Wisconsin residents with 24/7 self-service through a website, ACCESS, that is used over 250,000 times each month. ACCESS allows individuals to screen for potential benefits, apply for benefits, report changes, renew benefits, and check their benefits.

In 2003, DHS began incrementally updating CARES into a modern, Java-based web application called CARES Worker Web (CWW). Some of the major modules within CWW include Inbox, Application Entry, Eligibility Results, Workload Dashboard, Client Scheduling, Fair Hearings,

Income Maintenance Quality Assurance (IMQA) tool, FoodShare Employment and Training (FSET) tool, etc. While most front-end functionality has been migrated to CWW, the CARES mainframe continues to provide the majority of batch and eligibility processing.

Today, CARES includes all of the following supporting applications beyond CWW and ACCESS:

- Electronic Case File (ECF) - ECF provides anytime, anywhere access to citizens' case files, facilitating the movement of client's between counties, expediting SNAP and Medicaid quality control checks, reducing paper files' storage costs, and centralizing the receipt of documents, applications, and telephonic signature voice recordings.
- Master Customer Index (MCI) - MCI is a custom web application used to uniquely identify the same person across different computer systems. Participating systems include: CARES, ASSET (Job Search), FSIA (Functional Screen), interChange (MMIS), PPS and eWiSACWIS (Child Welfare).
- Functional Screen Information Access (FSIA) – FSIA is a custom web application used to determine functional eligibility for certain mental health services, adult long-term care programs and children's long-term support programs.
- Program Participation System (PPS) – PPS is a custom web application used to track program participation (enrollment) for various DHS Long-Term Care and Mental Health and Alcohol and other Drug Abuse (AODA) programs. PPS interacts with FSIA and CARES to validate/exchange real time information.
- Wisconsin Integrated Security Application (WISA) – WISA is a custom web application used to manage security profiles and provision user access for CWW and other systems.
- Employer Verification of Health Insurance (EVHI) – EVHI is a custom web application used to input employer-sponsored health insurance to verify access to employer-sponsored health insurance. This also includes an employer access portal for direct entry of their health insurance coverage information.
- Income Maintenance Management Reporting (IMMR) – IMMR is an enterprise data warehouse that captures, stores, and reports information pertaining to Income Maintenance programs (Medicaid and SNAP). IMMR is used to support decision making, performance monitoring, and trend analysis.
- MyACCESS Mobile – The MyACCESS mobile application allows members to manage their benefits on both iOS and Android devices, starting with a subset of the features available on the self-service web portal such as upload documents, manage account, and notifications.

<u>IRIS/Portals (DVR)</u>: DVR's case management system, Integrated Rehabilitation Information System (IRIS), is used by customers applying for the VR program, eligibility determination, order of selection, Individual Plan for Employment (IPE) development, tracking service purchasing, service delivery, and fiscal functions of the customer's case. The data collected through IRIS is used for federal reporting, counselor performance evaluation, monitoring progress toward division and WDA goals and ensuring that the division meets program standards.

IRIS has two interactive portals, the Financial Aid Office (FAO) portal and the Service Provider portal, that grant external partners access to IRIS for the purpose of sharing consumer information with DVR.

Wisconsin Work Programs (WWP): WWP is the case management system used by W-2 and other DCF Division of Family and Economic Security funded work program providers. The application currently allows providers to make program enrollments and referrals, document data gathered in a comprehensive informal assessment and career assessments, assign supportive services and document other actions assigned to address identified barriers to employment. Future phases of the project will modernize the development of the Employability Plan, document the assignment of work activities, track participation in activities and communicate with the CARES benefit issuance sub-system to ensure proper cash assistance payments to participants.

Financial Aid Office Portal: The Education & Training Grant module in IRIS considers the financial aid eligibility and award made to each student using information from the Free Application for Federal Aid (FAFSA). The DVR training grant calculator form is completed by DVR and Financial Aid Offices from Wisconsin based public and private schools affiliated with the University of Wisconsin System (UW System), the Wisconsin Association of Independent Colleges and Universities (WAICU) and the Wisconsin Technical College System (WTCS), through the FAO portal.

Service Provider Portal: DVR purchases goods and services from a wide variety of vendors and service providers to support a plan for individuals with disabilities to reach employment goals. These service providers can access the consumer information necessary for the provision of contracted services through the Service Provider Portal.

DVR Dashboard: DVR has a robust business intelligence platform that visualizes DVR customers, performance, and fiscal data to support DVR's efforts to improve case management performance, measure progress toward federal performance measure targets, and support the Division's quality assurance and program evaluation efforts.

Wisconsin Technical College System Reporting Systems: Each Title II Adult Education and Family Literacy Act (AEFLA) provider must collect and report Title II participation and accountability data to the Wisconsin Technical College System (WTCS) Office via the established WTCS reporting systems. The WTCS reporting systems allow Title II providers to submit participant-level data utilizing a portal through a comprehensive, secure system. The collected data is used to support federal reporting, state program management, and local program management. The required Title II data elements that must be reported are documented within the WTCS Client Reporting Manual and capture the necessary data required for WIOA reporting. Examples of data elements collected include date of birth, race/ethnicity, sex, barriers to employment, program exit date, test name, test topic, test date, and test scale score.

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF–

See section III.b.1.

The core and partner programs collect participant data separately because of each program's unique federal requirements. ETA funded programs collect data on a combination of paper and electronic application forms. Reportable individuals may register for the workforce system via the labor market exchange (Job Center of Wisconsin) which is interfaced with the DET's case management tool, the Automated System Support for Employment Training (ASSET). Programs collect data and staff review critical data with reportable individuals and assist in determining eligibility for each program. Program staff enter services, notes, and follow-up outcome information into the ASSET application. DWD's Bureau of Information Technology Services (BITS) initiated batch processes extract participant data from source systems to make reports

available in JCS2 data warehouse and for the Participant Individual Record Layout (PIRL) report.

DVR collects data electronically or from paper sources, which are then scanned and/or imaged. Data is also entered directly into IRIS, such as data required to create purchase orders for good or services. The data/documents also include referrals for services, data necessary for IPE development and case management, medical documentation, credential attainment documentation, measurable skills gain documentation, employment documentation, service provider purchase orders, reports and invoices. Data is input and document images are stored in IRIS. Data from IRIS is extracted into the data warehouse where it is used to create federal reports and to populate the DVR Dashboards.

Participant reports through JCS2 support the state's strategies by providing operational data to assist staff maintain situational awareness of their caseload. DWD is leading an effort to integrate a common intake and referral system between WIOA partner programs. Data collection and reporting governance, processes, training, and technology solutions are being developed with partial implementation due by PY 2020.

Business service teams and program staff report business services into JCW-Business application. BITS initiated batch processes extract data from JCW Business and make reports available in the JCS2 data warehouse for federal and operational reporting. JCW Business and JCS2 data warehouses provide business contact information for staff to maximize integration of business services efforts.

DCF collects TANF work programs data in two primary systems: CARES and WWP. Eligibility is determined and recorded in CARES. Employment tracking, employment planning, activity assignment, and participation in activities are also recorded in CARES. Informal assessment information, work history, and enrollment are recorded in WWP. Federal reports are pulled from numerous auto-generated web-based reports and direct data table queries. Program providers collect data and state staff review critical data for each program. Local program staff enter services, notes, and follow-up outcome information into both the CARES and WWP applications.

Title II providers submit data to WTCS reporting systems beginning in October of the program year through the following August 15. On August 15, WTCS reporting system submissions will be frozen and the data will be reviewed for accuracy and validity. Required final corrections, when necessary, are communicated to the AEFLA provider and must be made by September 1.

Each Title II program must report the required data for each participant served on at least a quarterly basis. Specifically, providers must report program year data by the 14th of the month in October, January, April, and July. The WTCS Office monitors Title II program data submissions and contacts providers that are not in compliance with the Wisconsin Title II data reporting schedule.

To verify the validity of data and ensure Wisconsin Title II program compliance with data collection and reporting requirements, the WTCS Office has integrated a series of data quality safeguards into WTCS reporting systems. Some of these safeguard include ongoing local program use of data quality review reports, reporting system requirements to only collect valid data (e.g., only state approved assessment data can be entered into the system), ongoing data monitoring coordinated by the WTCS Office, and data validation procedures including data matches with external entities.

To collect the necessary data to support the calculation of the federally required WIOA primary indicators of performance, the WTCS Office matches participant data provided in WTCS reporting systems with external data sources. This process is called data matching. The data matching process consists of linking Title II participant data to data in an external data source to better understand Title II participant outcomes such as employment second quarter after exit. Coordinating data matches through the WTCS Office reduces the burden of data collection for Title II providers, promotes data consistency across all Wisconsin Title II programs, and enhances overall data quality.

The WTCS Office has established a series of agreements with external entities to support data matching. These external entities include the Wisconsin Department of Workforce Development Unemployment Insurance Division to support employment indicator outcomes, the Wisconsin K-12 Department of Public Instruction to support Measurable Skill Gains secondary diploma or recognized equivalent attainment and Credential Attainment Rate outcomes, and the National Student Clearinghouse to support Credential Attainment Rate outcomes. The WTCS Office initiates the data matching process once the WTCS reporting systems have closed for the program year. Additionally, the WTCS Office coordinates data matches with other WIOA core programs to generate the data necessary to report the federally required WIOA co-enrollment rate.

## 2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (E.G., CO-ENROLLMENT POLICIES AND UNIVERSAL INTAKE PROCESSES WHERE APPROPRIATE). IN ADDITION, PROVIDE THE STATE'S GUIDELINES FOR STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM

DWD's Bureau of Workforce Training reviews and issues policy guidance on an ongoing basis to support the implementation of WIOA. Policies have been issued on Oversight and Monitoring, Functions of local WDBs, Grant Closeouts, ETPL Eligibility and Individual Training Accounts, Adult and Dislocated Worker Eligibility, Priority of Service, Economic Self-Sufficiency, Youth Eligibility, and Performance Accountability and Reporting. Current WIOA Title I-B policies are available at: https://dwd.wisconsin.gov/wioa/policy/

DWD encourages co-enrollment of participants in WIOA core and partner programs when appropriate and beneficial to the jobseekers needs. A team of policy analysts from all program partners is working on additional joint guidance on common intake and co-enrollment so that all partners have a shared understanding of requirements. Training will also be implemented so that all partner staff understand all core and partner programs and can meet the needs of jobseekers and businesses at any entry point.

DWD issues an annual timeline and deadlines for local areas to negotiate and incorporate infrastructure funding agreements (IFAs) into their MOUs. The timeline for PY20 has been shared with workforce development boards and is as follows:

- May 18, 2020 – IFA negotiations commence and must be completed by May 29, 2020
- August 1, 2020 – MOU/IFAs due to the Department of Workforce Development
- August 1 – 31, 2020 – MOU/IFAs are routed for signatures
- August 31, 2020 – Completed MOU/IFAs are due to DWD

This timeline was adjusted due to the effects of COVID-19 on Wisconsin's workforce planning and implementation. Future timelines will be adjusted to ensure MOUs and IFAs are completed prior to the start of a new program year.

**Job Center Memoranda of Understanding (MOUs)**

The local WDB, with the agreement of the CEO, must develop and enter into a Memorandum of Understanding (MOU) between the WDB and the one-stop partners identified in Section 2.2.1 of this chapter.[1] The local WDB may opt to develop an "umbrella" MOU including all Job Center locations or a group of Job Centers within its borders, or develop individual MOUs for each Job Center location. Each MOU must include the following provisions:

- A description of the services to be provided through the Job Center System, including the manner in which the services will be coordinated and delivered throughout the system;[2]
- A description of how the costs of such services and the operating costs of such system will be funded including through cash and in-kind contributions and funding of the Job Center infrastructure costs;[3]
- Methods of referral of individuals between the one-stop operator and the one-stop partners for appropriate services and activities;[4]
- Methods to ensure the needs of workers and youth (which includes individuals with barriers to employment and individuals with disabilities) are addressed in the provision of necessary and appropriate access to services, including access to technology and materials, made available through the Job Center System;[5]
- The duration of the MOU and the procedures for amending the MOU during the duration, and assurances that such MOU shall be reviewed not less than once every year to ensure appropriate funding and delivery of services.[6]

The MOU may include other provisions as the parties to the agreement determine to be appropriate.[7]

All provisions must be documented using the MOU Template developed and provided by DWD-DET.

**One-Stop Infrastructure Funding**

All one-stop partner programs **must** contribute to the infrastructure costs of comprehensive job centers based on their proportionate use of the one-stop delivery system and relative benefit received.[8] In affiliate job centers, only the one-stop partners participating in the affiliate job center must contribute to the infrastructure costs for that job center.[9] When two or more entities receive funding to carry out a required program in the local area, each entity must contribute to infrastructure costs, including costs at an affiliate job center.[10]

**NOTE:** Native American programs authorized under WIOA sec. 166 are not required to contribute to job center infrastructure costs. Any agreement to contribute, or not contribute, must be documented in the MOU. The lack of agreement on infrastructure costs with Native American programs does not trigger the State Funding Mechanism (SFM) for the local area, and Native American programs are not subject to the SFM if it is triggered. [11]

The term "infrastructure funding," used with respect to a Job Center, means the non-personnel costs that are necessary for the general operation of the Job Center[12]. Line items that fall into this category may include:

- Rent – The costs for usage (lease) of the facility, or portion of the facility, in question. This should not include any other line items (i.e. utilities or maintenance) unless they are included in the lease.
- Maintenance – The costs to maintain the physical structure of the facility, including janitorial services, lawn care, and snow removal.
- Utilities – The costs for general services to the facility in question, such as electricity, gas, water and sewage, but not including internet access.
- Equipment[13] – The costs for equipment used to facilitate access to the one-stop center, including, but not limited to, assessment-related and assistive technology for individuals with disabilities.
- Common Identifier Costs – The costs for signage, outreach, and other identification for the one-stop center.
- Technology – The costs for technology to facilitate access to the one-stop center (i.e. internet access), including, but not limited to, technology used for the center's planning and outreach activities. This includes assistive technology to ensure meaningful access for individuals with disabilities.
- Supplies[14]— The costs for items as defined in Uniform Guidance at 2 CFR 200.94, used to support the general operation of the one-stop center.[15]

**NOTE:** DWD-DET-provided computers, software, internet connectivity, phone lines, fax lines, printers, and multi-functional devices made available for use by the general public in job center resource rooms must be included in local negotiations as infrastructure equipment, technology, and/or supply costs.[16] DWD-DET will provide an itemized breakout of these costs to each local WDB at the start of each MOU planning cycle.

It is not necessary to identify in the MOU shared costs that are directly cost-allocated through an individual partner's lease agreement with the lessor (i.e. costs for Resource Room space, shared conference rooms, bathrooms, and hallways that are cost-allocated to each partner through the lease agreements). This also applies to shared maintenance, utility, and/or supply costs that are cost-allocated by the landlord through the individual lease agreements. In this case this should be clearly documented in the Infrastructure Funding Agreement (IFA).

Partners must negotiate the extent of infrastructure costs. In-kind contributions are allowable; however, partners must agree that the in-kind contribution is required in the job center and is an acceptable form of cost contribution among the partners.

The local WDB, CEOs, and Job Center partners in a local area may fund the costs of Job Center infrastructure through:

- The Local Funding Mechanism (LFM) or
- The State Funding Mechanism (SFM).[17]

***Local Funding Mechanism (LFM)***

Local WDBs must attempt to engage partners in good-faith negotiations using locally identified costs and locally determined cost allocation methodologies agreed upon by the local WDB, CEOs, and Job Center partners.[18] These costs and cost allocation methodologies comprise the Local Funding Mechanism (LFM).

**State Funding Mechanism (SFM)**

In cases when local negotiations related to the funding of one-stop infrastructure cannot be successfully completed within the timeframes established in DWD-DET's annual MOU guidance, the local WDB must notify DWD-DET of the failed negotiations, which will trigger application of the State Funding Mechanism (SFM). The SFM may be triggered in any case where one or more required partners fail to reach consensus related to infrastructure costs.[19] Failure to reach consensus on additional costs does not trigger the SFM.[20] Failure to reach consensus on infrastructure costs with additional non-required partners does not trigger the SFM.[21]

The SFM looks at the covered portion of funding for a fiscal year for a program that is a required partner. In local areas where the SFM is applied, the covered portions of funding for a fiscal year shall be provided to DWD-DET from the required partner programs to assist in paying the costs of infrastructure of Job Centers in those local areas of the State not adequately funded under the local funding mechanism.

A request to invoke the SFM must be submitted by the local WDB, in writing[22], to the assigned Local Program Liaison. This request must include:

1.
    a. a description of the good-faith negotiations that occurred at the local level;
    b. a copy of, or link to, the WIOA Local Plan;
    c. a description of the cost allocation methodology or methodologies proposed by the partners to be used in determining the proportionate share;
    d. the proposed amounts or budget to fund infrastructure costs and the amount of partner funds included;
    e. the type of funds (cash, non-cash, and third-party in-kind contributions) available;
    f. any proposed or agreed upon one-stop center or system budget; and
    g. any partially agreed upon, proposed, or draft Infrastructure Funding Agreements (IFAs).[23]

Once a request is received, DWD-DET will:

1. Determine the infrastructure budget(s).
    a. If a budget was agreed upon by the one-stop partners during local negotiations, but consensus was not reached on individual programmatic contributions, then DWD-DET will use the locally determined budget.
    b. If consensus was not reach by local partners on an infrastructure budget, or DWD-DET determines that the agreed upon budget does not adequately meet the needs of the local area or does not reasonably work within the confines of the resources available to that local area, then DWD-DET must use a formula determined by the State WDB using the following factors:

i. The number of one-stop centers in a local area;

ii. The total population served by such centers;

iii. The services provided by such centers; and

iv. Any factors relating to the operations of such centers in the local area that the State WDB determines are appropriate.[24]

1. Establish a cost allocation methodology to determine the distribution of infrastructure funding costs among local one-stop partners based on proportionate use of the one-stop center and relative benefit received. This cost allocation methodology must be consistent with the Federal Cost Principles of the Uniform Guidance in 2 CFR Part 200, all relevant Federal regulations and statutes, further regulatory guidance, and the partner programs' authorizing laws and regulations. The following methodologies may be considered:

    a. Number of customers served;

    b. Square footage used;

    c. Full-time equivalent staff employed by each partner;

    d. Other variables as determined appropriate to the local area.[25]

1. Apply the established cost allocation methodology or methodologies to the infrastructure budget to determine partners' proportionate shares. In doing so, DWD-DET will consider the following:

    a. The costs of administration of the one-stop delivery system for purposes not specifically related to a one-stop center for each partner (i.e. costs associated with maintaining the Local WDB or information technology systems);

    b. Statutory requirements for each partner program;

    c. Each one-stop partner's ability to fulfill such requirements; and

    d. All other applicable legal requirements.[26]

1. Calculate the statewide caps to determine the maximum amounts that required partner programs could be **required** to contribute toward infrastructure funding in the local area. This is a requirement even when only one local area is unable to reach consensus on an IFA through the LFM, but the caps only restrict those infrastructure cost contributions required by one-stop partners within the local area(s) that has (or have) not reached consensus.

NOTE: If multiple local areas do not reach consensus, then the total infrastructure funding costs that must be contributed by each required one-stop partner in all of the local areas that do not reach consensus is restricted by the program cap. For example, if three of eleven local areas do not reach consensus, then the required infrastructure funding contributions of each required one-stop partner under a particular program in these three areas would be added together, the sum of which could not exceed the calculated applicable program cap.

To calculate the applicable program caps, DWD-DET will take the following steps:

1.

a. Apply a partner's individual applicable limiting percentage[27] to the total Federal funding which that program receives for the affected program year to reach the maximum potential cap (MPC).

**Limiting % x total Federal program funding = MPC**

1.

a. Select a determining factor or factors that reasonably indicate the use of one-stop centers in the State. DWD-DET may use the WIOA formula allocation methodology, or other appropriate data, to determine this factor.

b. Apply the determining factor(s) to **all** local areas across the State, and then determine the percentage of the factor(s) that is applicable to those areas that reached consensus, or the consensus areas' factor percentage.

c. Apply the consensus areas' factor percentage to the MPC to find the consensus areas' portion of the MPC.

**Consensus areas' factor % x MPC = Consensus areas' portion of the MPC**

1.

a. Subtract the amount equal to the consensus local areas' portion of the MPC from the MPC. The remaining amount is the applicable program cap for use in the local areas that have not reached consensus and are subject to the SFM.

**MPC – Consensus areas' portion of MPC = Applicable program cap for non-consensus area(s)**

1. Assess the aggregate total of infrastructure contributions as it relates to the statewide cap to ensure that the funds required to be contributed by each partner program in the non-consensus local area(s), in aggregate, do not exceed the applicable program cap.

a. If the aggregate total contributions are below the applicable program cap, then DWD will direct the one-stop partners to contribute what was determined to be their proportionate shares.

b. If the aggregate total contributions exceed the cap, then DWD-DET may either:

i. Inquire as to whether those local partner programs that have pushed the aggregate total contributions above the applicable program cap are willing to contribute beyond the applicable program in accordance with their proportionate share; or

ii. Allow the local WDB, one-stop partners, and CEO(s) to re-enter negotiations to reassess each one-stop partner's proportionate share and make adjustments and identify alternate sources of funding to make up the difference between the capped amount and the proportionate share of infrastructure funding on the one-stop partner; and/or reduce infrastructure costs to reflect the amounts of funds available without exceeding the applicable program cap level.

1. If re-negotiation fails under step 5 above, adjust the proportionate shares to ensure that the aggregate total contribution of a program's local one-stop partners under the SFM does not exceed the applicable program cap.

Once all SFM calculations are completed, DWD-DET will notify, in writing, all required partners of their required contribution. This notification will include documentation showing the calculations completed.

**Appeals by Job Center Partners**

Any Job Center partner may appeal the portion of infrastructure funds assigned to them under the SFM by following the appeals process outlined in the WIOA State Plan as follows:

1. Submit a written appeal to CWI within 15 calendar days of receiving a written determination notification;
    a. Explain why it believes the determination is contrary to the provision of WIOA section 102(b)(2)(D)(i)(IV).
2. CWI Chair will convene a special meeting of a designated committee to review and respond in writing to such an appeal within 30 calendar days of its receipt.
3. If the petitioning entity is denied, further appeal to the Secretary of Labor may occur if the entity alleges that the area meets the requirements of WIOA section 102(b)(2) or that the entity was not accorded procedural rights under the State appeal process described herein. All such appeals to the Secretary must be submitted within 15 calendar days of receipt of the notification of denial by the CWI on behalf of the Governor. The appealing entity must simultaneously notify the Governor and the CWI of such an appeal to the Secretary of Labor. The Secretary of Labor will make a final decision within 30 calendar days after the appeal is received. The Secretary of Labor will notify the Governor and the appellant in writing of the Secretary's decision. Pending the Secretary of Labor's decision, the original determination of infrastructure costs will be implemented.

**Shared Delivery Costs / Additional Costs**

One-stop partners **must** share in additional costs, which must include applicable career services, and may include shared operating costs and shared services that are necessary for the general operation of the one-stop center.[28] The costs of shared career services may include initial intake, assessment of needs, appraisal of basic skills, identification of appropriate services to meet such needs, referrals to other one-stop partners, and business services, including the personnel expenses associated with delivering these services.

The cost of the competitive procurement for a one-stop operator, and the subsequent contract issued to a one-stop operator in each job center or one-stop delivery system, may be negotiated as a shared delivery cost with one-stop partners assuming one-stop partners come to consensus on the shared cost and cost-allocation methodology.

Resource room costs, other than those for DWD-DET-provided computers, software, internet connectivity, phone lines, fax lines, printers, and multi-functional devices made available for use by the general public in job center resource rooms[29] may be included in local negotiations as shared delivery costs. This includes the cost of integrated career service provision as well as personnel costs related to shared career services and/or reception services which may or may not be included in a one-stop operator contract. For staff who split their time between resource

room/reception functions and other functions, reasonable measures should be used to split their staffing costs between the functions they perform.

Partners must negotiate the extent of sharing delivery/additional costs. In-kind contributions are allowable; however, partners must agree that the in-kind contribution is required in the job center and is an acceptable form of cost contribution among the partners.

**Local Negotiations**

Local WDBs and all WIOA-required one-stop partners must enter into good-faith negotiations to determine each provision in the MOU, including:

- Completion of the MOU template regarding the structure and integration of the one-stop delivery system in the local area;
- Costs necessary to support the infrastructure of the one-stop delivery system in the local area;
- Costs necessary to support the delivery of shared services in the local area;
- The cost allocation methodology or methodologies by which shared costs will be split between partners to reflect proportionate use and relative benefit.

DWD-DET strongly recommends convening these negotiations in-person to facilitate effective communication between all parties. Local WDBs, CEOs, and/or partners may request assistance with the negotiation process from DWD-DET.

The method for determining the appropriate portion of funds and noncash resources to be provided by the Job Center partner for each program for a Job Center must be determined as part of the development of the MOU for the Job Center or Job Center System and must be stated in the MOU. In cases where local negotiations stall or fail DWD-DET will implement the State Funding Mechanism (SFM) upon request.

**Allocation Cost Pools**

Local areas are empowered to select the cost sharing methodologies that best suit the needs of the participating one-stop partners. While some areas might be best served by a single cost-sharing method, others may benefit by allocating different types of costs using multiple methodologies. To simplify the cost-allocation process, DWD-DET recommends that partners bundle similar costs into cost pools and allocate the pools as a whole, as opposed to allocating each line item individually. For example, a WDB may choose to bundle all infrastructure costs into one cost pool that is allocated on a square-footage basis, while the remaining costs are pooled and allocated on a per-participant basis. This allows WDBs more flexibility in determining equitable cost allocations for costs driven by use, while correctly accounting for fixed facility costs. Acceptable cost allocation methodologies may include:

- Square footage
- Full-time equivalent employee count (FTE)
- Customer count
- Customized/Manual allocations based on local negotiations

**Budget Development, Modification, and Periodic Reconciliation**

The local WDB must develop an annual budget for each certified Job Center within the WDA. Each budget should break down items into the cost allocation pools and expense types used during the negotiation process, with projected numbers.

The system of record for Job Center budgets is DWD-DET's Sharing of Local Area Resources (SOLAR). Annual budgets and any budget modifications during the MOU period must be entered into SOLAR. Budgets must also be reconciled against actual expenditures on, at minimum, a quarterly basis using SOLAR's periodic reconciliation feature.

**Review and Approval Process**

In order for the local WDBs MOU(s) to be considered complete and ready for review by DWD-DET, the following must be completed:

1. Successful negotiation of terms with all required and additional one-stop partners, or implementation of the State Funding Mechanism; and
2. Completed documentation of the agreed upon terms using the MOU Template, Infrastructure Funding Agreement template, and Shared Delivery Cost Agreement template; and
3. Development of job center budgets in the SOLAR application.

These documents must be submitted to the assigned Local Program Liaison for DWD-DET review and approval.

Upon DWD-DET approval of the MOU documents, they will be returned to the local WDB to be routed for signatures by all relevant signatory authorities. The signatory authority for all DWD programs is the Deputy Secretary of the Department.

Completed and signed MOUs will be uploaded to the SOLAR application.

[1] WIOA sec. 121(c)(1)

[2] WIOA sec. 121(c)(2)(A)(i)

[3] WIOA sec. 121(c)(2)(A)(ii); Must be fairly evaluated. May include funding from philanthropic organizations or other private entities, or through other alternative financing options.

[4] WIOA sec. 121(c)(2)(A)(iii)

[5] WIOA sec. 121(c)(2)(A)(iv)

[6] WIOA sec. 121(c)(2)(A)(v); DWD-DET has determined that MOUs must be reviewed annually to reflect accurate budgets.

[7] WIOA sec. 121(c)(2)(B)

[8] TEGL 17-16, p. 2-3 and p. 5-6

[9] TEGL 17-16, p. 6

[10] TEGL 17-16, p. 6

[11] TEGL 17-16, p. 8

[12] WIOA sec. 121(h)(4), TEGL 17-16, p. 4

[13] 2 CFR 200.33

[14] 2 CFR 200.94

[15] TEGL 17-16, p. 4

[16] Email from Deborah Strama, USDOL-ETA, 1/8/2020

[17] WIOA sec. 121(h)

[18] TEGL 17-16, p. 19

[19] TEGL 17-16, p. 20

[20] TEGL 17-16, p. 20

[21] TEGL 17-16, p. 20

[22] TEGL 17-16, p.

[23] TEGL 17-16, p. 21

[24] TEGL 17-16, p. 21-22

[25] TEGL 17-16, p. 22

[26] TEGL 17-16, p. 22

[27] WIOA sec. 121(h)(2)(d); 20 CFR 678.738(c); 34 CFR 361.738(c); 34 CFR 463.738*c) TEGL 17-16, p. 24-25

[28] TEGL 17-16, p. 4

[29] These costs are identified as infrastructure costs and must be shared.

SOLAR: The Sharing Of Local Area Resources (SOLAR) web-based application supports state, local boards, and partners so they meet the requirements under the Workforce Innovation and Opportunity Act (WIOA) to enter into a Memorandum of Understanding (MOU). The MOU describes the operation of the one-stop delivery system, sharing and allocation of costs among one-stop partners in accordance with WIOA law, WIOA regulations and the Federal Cost Principles contained in the Uniform Administrative Requirements and Audit Requirements for Federal Awards.

In the SOLAR application, users can:

- Create and edit job center budgets;
- Attach supporting documentation;
- Access the MOU template;
- and reconcile actual expenses.

Several of the workforce boards were represented on the bi-weekly workgroup during the development of SOLAR. This was proven invaluable to include input from staff who will be using the application. SOLAR was demonstrated to the Department of Labor Region V Leadership on September 18, 2019.

Joint guidance will be developed as the SOLAR application is tested and used. There is also basic information on the SOLAR help page. The fiscal monitoring team will be providing technical assistance to local workforce board staff as needed and during the PY19 monitoring cycle.

The WIOA Performance Advisory Committee in conjunction with the Combined State Plan partners developed several pieces of Joint Guidance during PY 2016 and PY 2017 addressing opportunities for common processes. Joint guidance on credential definitions, measurable skill gain, business service reporting and supplemental data collection procedures was issued. The guidance was provided for use by staff within the core WIOA programs as well as TAA and JVSG programs.

- Wisconsin Joint WIOA Credential Detailed Guidance
- Wisconsin Joint WIOA Measurable Skill Gain Guidance
- Wisconsin Joint WIOA Effectiveness in Serving Employers Reporting Guidance
- Wisconsin Joint WIOA Supplemental Data Collection Guidance

Over the next two years, DWD and the new Combined State Plan Partners will, in conjunction with the Performance Advisory Group and the WIOA Integrated Service Delivery Policy and Guiding Principles Group, review and revise as appropriate, state policies that support the implementation of the state's strategies and the process for developing guidelines for State administered one-stop partner programs' contribution to the one-stop delivery system.

## 3. STATE PROGRAM AND STATE BOARD OVERVIEW

### A. STATE AGENCY ORGANIZATION

The table below includes each of the programs included in Wisconsin's Combined State Plan and the state agency that has administrative authority for each.

**Section III, Table 1. State Agency and Program Administrative Authority**

| State Agency | Programs |
|---|---|
| Department of Workforce Development | • Title I: Adult, Dislocated Worker, Youth<br>• Title III: Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)<br>• Title IV: Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)<br>• Trade Adjustment Assistance for Worker Program (Chapter 2, Title II Tract Act)<br>• Jobs for Veterans State Grants (Title 38, Chapter 41) |
| Wisconsin Technical College System | Title II: Adult Education and Family Literacy |
| Department of Children and Families | Temporary Assistance for Needy Families (TANF) |

| State Agency | Programs |
|---|---|
| Department of Corrections | Reintegration of Ex-Offenders Program |
| Department of Health Services | Employment and Training Programs under the Supplemental Nutrition Assistance Program (SNAP E&T) |

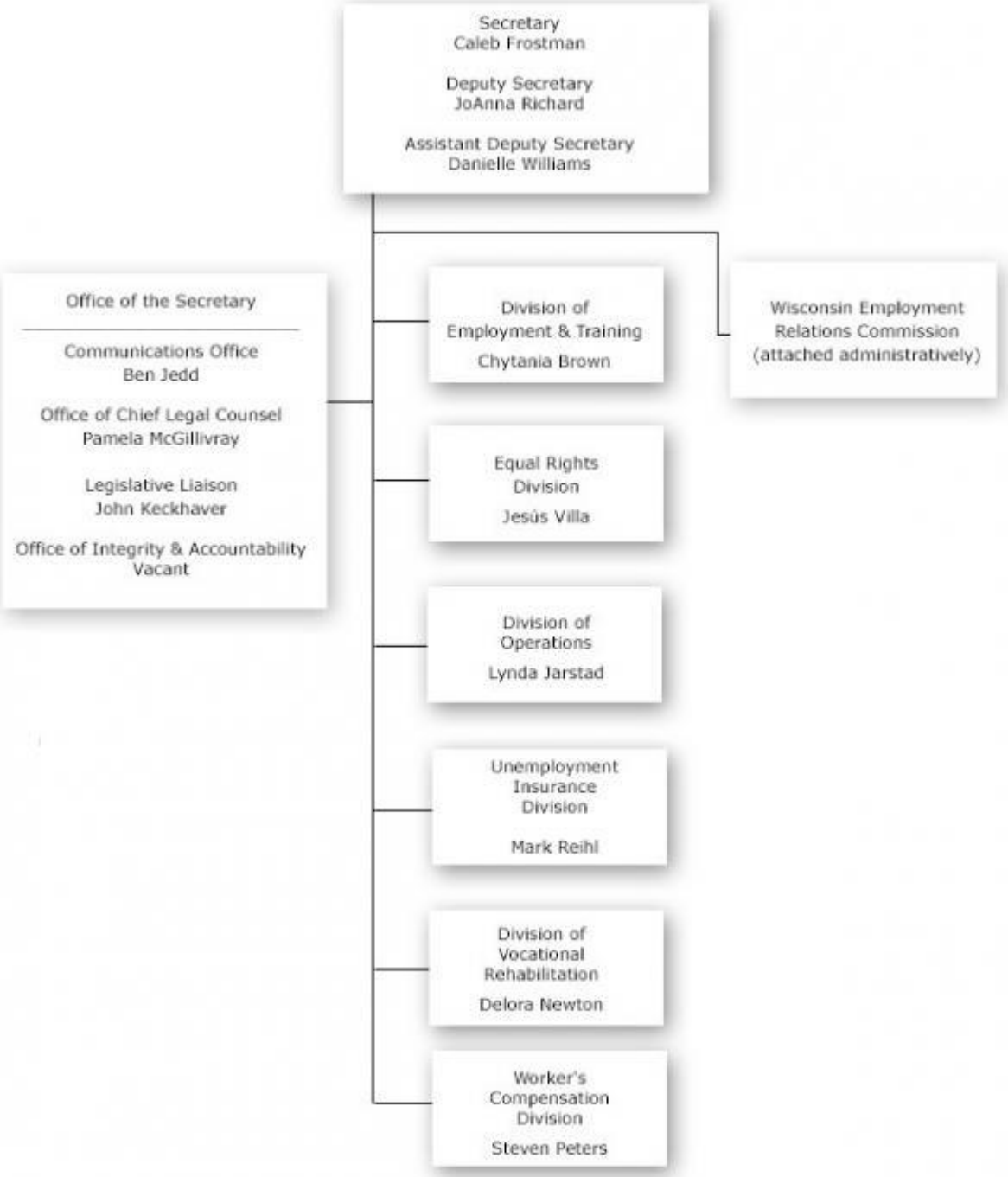
**Department of Workforce Development (DWD)**

DWD is a state agency charged with building and strengthening Wisconsin's workforce in the 21st century and beyond. DWD is led by Secretary Caleb Frostman, appointed by the Governor, and Deputy Secretary JoAnna Richard and Assistant Deputy Secretary Danielle Williams. There are six divisions within DWD: Employment & Training (DET), Equal Rights, Operations, Unemployment Insurance (UI), Vocational Rehabilitation (DVR), and Worker's Compensation. WIOA Titles I, III, and IV are administered by DWD.

Chytania Brown is the Administrator for the Division of Employment and Training which has administrative responsibility for Title I programs, Wagner-Peyser, TAA, and JVSG.

Delora Newton is the Administrator for the Division of Vocational Rehabilitation which is responsible for overseeing Title IV.

**Section III, Chart 5: Department of Workforce Development Organizational Chart**



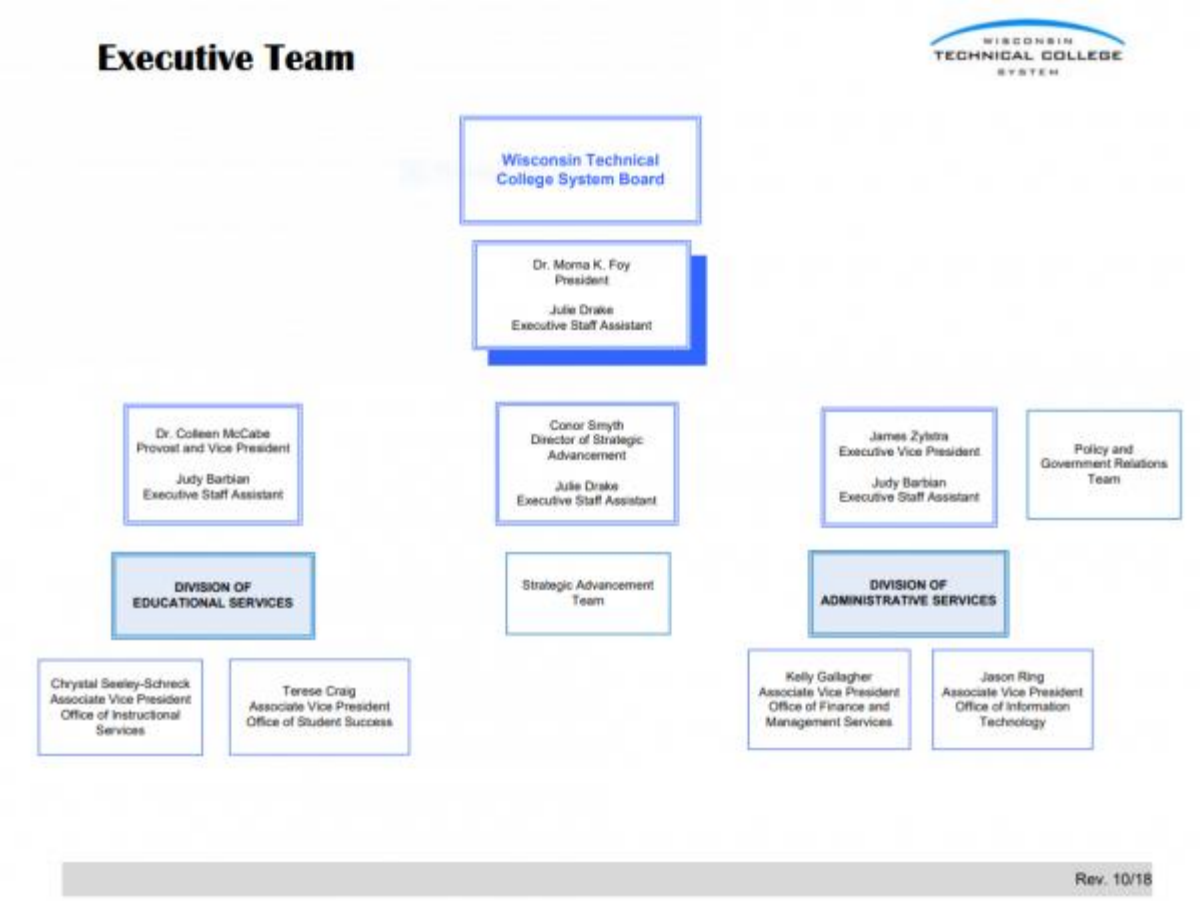

Department of Workforce Development

**Wisconsin Technical College System**

The Wisconsin Technical College System (WTCS) implements statewide policies and standards established by the WTCS Board and administers state funding provided for technical college programs and services. WTCS is led by system president Dr. Morna Foy, appointed by the board.

ABE and English Language service are the responsibility of WTCS's 16 technical colleges (statewide system). Additionally, through the competitive grant process, a small group of CBOs, literacy councils, and county jails receive funding to provide these services. The entire state is covered by these providers. All activities funded by WIOA Title II are authorized, approved, and overseen by the WTCS Board, Associate Vice President of Office of Student Success, and ABE staff. Terese Craig, Associate Vice President of the Office of Student Success, is the State Director for ABE.

**Section III, Chart 6: Wisconsin Technical College Organizational Chart**



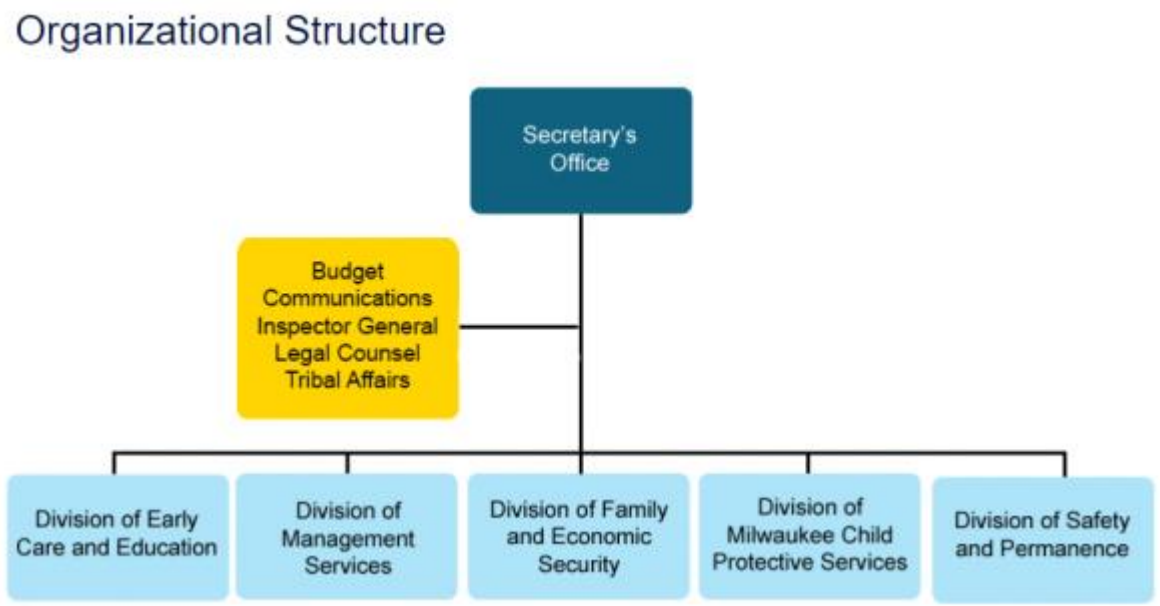

Wisconsin Technical College System

**Department of Children and Families (DCF)**

DCF is the state agency responsible for ensuring Wisconsin's children and youth are safe. DCF is led by Secretary-designee Emilie Amundson, appointed by the Governor, and Deputy Secretary Jeff Pertl and Assistant Deputy Secretary Danielle Melfi. There are five divisions within the agency: Division of Early Care and Education, Division of Management Services, Division of Family and Economic Security, Division of Milwaukee Child Protective Services, and Division of Safety and Permanence.

Connie Chesnik is the Administrator for the Division of Family and Economic Security (DFES). DFES houses TANF, Child Support, Refugee Services, and the Transform Milwaukee and Transitional Jobs programs.

**Section III, Chart 7: Department of Children and Families Organizational Chart**



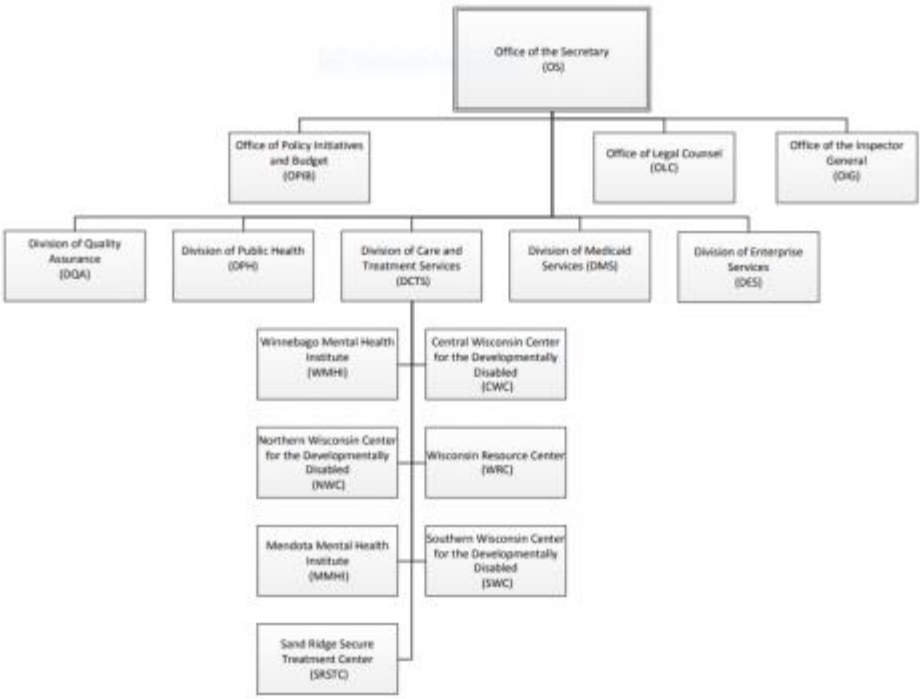

Department of Children and Families

**Department of Health Services (DHS)**

DHS is committed to protecting and promoting the health and safety of the people of Wisconsin, making sure everyone can live their best life. DHS is led by Secretary-designee Andrea Palm, appointed by the Governor, and Deputy Secretary Julie Willems Van Dijk and Assistant Deputy Secretary Nicole Safar. There are five divisions within the agency: Division of Quality Assurance, Division of Public Health, Division of Care and Treatment Services, Division of Medicaid Services, and the Division of Enterprise Services.

The Division of Medicaid Services supports Wisconsin's Medicaid programs and FoodShare program and provides access to health care, long-term care, and nutritional assistance to more than one million Wisconsin residents who are elderly, have a disability, or have low income. Staff within DMS provide administrative and policy oversight and guidance as well as systematic support to contracted regional FoodShare Employment and Training (FSET) vendors.

**Section III, Chart 8: Department of Health Services Organizational Chart**



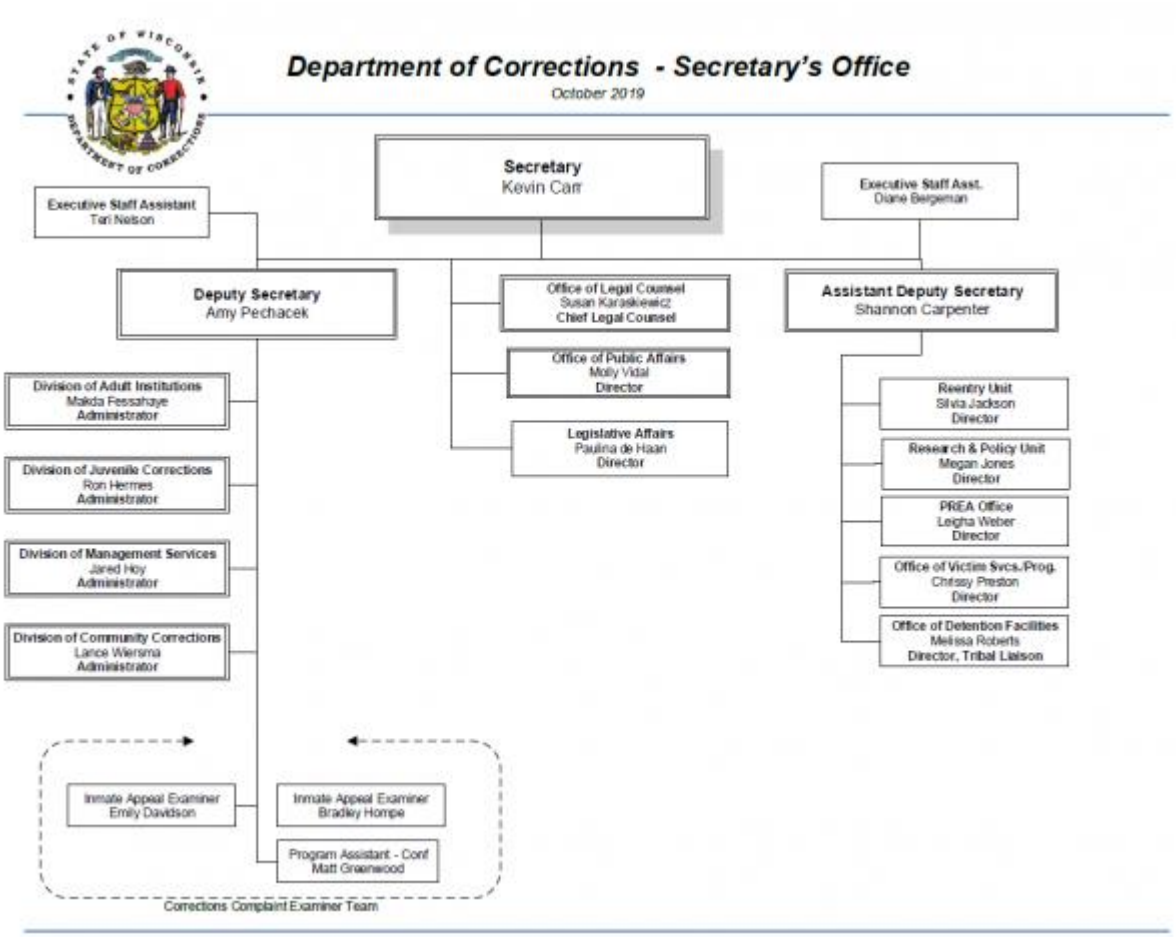

Department of Health Services

**Department of Corrections (DOC)**

DOC is the state's public safety agency that provides care and services to approximately 23,000 individuals incarcerated in 37 state institutions and supervises over 66,000 persons on probation and parole through 131 field offices. DOC is led by Secretary Kevin Carr. The agency has four divisions: Division of Adult Institutions, Division of Community Corrections, Division of Juvenile Corrections, and the Division of Management Services.

The Secretary's Office oversees a variety of functions including: reentry policy and programs, research, detention facilities, Prison Rape Elimination Act, victim services, and communications. Dr. Sylvia Jackson is the Director of the Reentry Unit.

**Section III, Chart 9: Department of Corrections Organizational Chart**




Department of Corrections

B. STATE BOARD

The Governor's Council on Workforce Investment (CWI) is the state workforce development board for Wisconsin. Through Executive Order #152 the Council was updated to be compliant with WIOA and was reconstituted under Governor Evers' Executive Order #6 in January 2019. The Council is administratively housed within the Department of Workforce Development. All members are appointed by the governor.

I. MEMBERSHIP ROSTER

**COUNCIL ON WORKFORCE INVESTMENT BOARD MEMBERSHIP**

- Governor Tony Evers
- Caleb Frostman (Secretary, Department of Workforce Development: *Title I,III Rep*)
- Emilie Amundson (Secretary, WI Department of Children and Families)
- Rebecca Bartoszek (President/CEO, Fox Cities Chamber: *Biz Rep*)
- Scott Bertschinger (VP, Human Resources/Risk, Spancrete Group: *Biz Rep*)
- Dave Brukardt (Associate VP Econ Development, UW System: *Education Rep/Econ Rep*)
- Andrew Disch (Political Director, Regional Carpenters Council: *Workforce Rep*)

- Vice Chair Cedric Ellis (Executive VP/Chief Enterprise Services Officer, CUNA: *Biz Rep*)
- Michele Erikson (Executive Director, Wisconsin Literacy Inc: *Workforce Rep*)
- Rodney Ferguson (CEO/General Manager, Potawatomi: *Biz Rep*)
- Dr. Morna Foy (President, Wisconsin Technical College System: *Title II Rep*)
- Ann Franz (Executive Director, NEW Manufacturing Alliance: *Workforce Rep*)
- Betsey Harries (Executive Director, Ashland Area Development Corporation: *Biz Rep*)
- WI State Sen. Andre Jacque (*State Legislature Rep)*
- Ruthie Johnston (President, Croix Gear & Machining: *Biz Rep*)
- Mark Johnson (Director of Consulting, CGI: *Biz Rep*)
- Jim Kreuser (Kenosha County Executive: *County Government Rep*)
- Terry McGowan (President/Business Manager, Interntl Union Operating Engineers: *Workforce Rep*)
- Dan Mella (Asst. Superintendent for Curriculum/Instruction, Plymouth School District: *Workforce Rep*)
- Delora Newton (Division Administrator, Dept of Vocational Rehabilitation: *Title IV Rep*)
- Saul Newton (Founder/Exec Director, Wisconsin Veterans Chamber of Commerce: *Biz Rep*)
- Alan Petelinsek (CEO, Power Test: *Biz Rep*)
- WI State Rep. Warren Petryk (*State Legislature Rep)*
- Pravin Raikar (President, Lockstep Solutions: *Biz Rep*)
- WI State Sen. Janis Ringhand (*State Legislature Rep)*
- Sara Rogers (Business Services Manager, Employ MKE: *Workforce Rep*)
- Nora Roughen-Schmidt (Executive Director, Viroqua Chamber Mainstreet: *Biz Rep*)
- Kathi Seifert (President, Katapult LLC: *Biz Rep*)
- WI State Rep. Katrina Shankland (*State Legislature Rep)*
- Sachin Shivaram (CEO, WI Aluminum Foundry Co Inc.: *Biz Rep*)
- Rhonda Suda **ex officio** (CEO, Southwest WI Workforce Development Board)
- Carolyn Stanford Taylor (Superintendent, Department of Public Instruction: *Education Rep*)
- CWI Chair Mark Tyler (Chairman, OEM Fabricators: *Biz Rep*)
- Dr. Rolf Wegenke (President/CEO, WAICU: *Education Rep*)
- Ann Zenk (VP Workforce & Clinical Practice, Wisconsin Hospital Association: *Biz Rep*)

- Corey Zetts (Executive Director, Menomonee River Valley: *Biz Rep*)

The State Board does not currently have a SNAP E&T program representative.

## II. BOARD ACTIVITIES

All new board members are provided an orientation on the background, purpose, and activities of the Council. The CWI Policy Analyst serves as the point person in providing CWI with overall staff support, administrative assistance, and policy advisement. The CWI Analyst, in consultation with the Council Chair and DWD leadership team, oversees the creation and distribution of agendas, meeting materials, and supporting documents for council meetings, as well as organizes meeting logistics and manages CWI emails and contact information and provides additional support as needed.

Biennial WIOA Roundtables are held to provide CWI and partners with information on how to carry out their mandated responsibilities. Additionally, bureau directors provide regular presentations and updates to help keep the CWI and its committees involved and up to date on what is going on. The Board takes an active role in creating the four-year State Plan, which serves as a guiding document to help focus CWI and state resources and craft their workforce development outreaches and inputs accordingly, in accordance with WIOA guidelines.

The state workforce board assumes several critical strategic and operational functions to better support aligned and effective service delivery, in addition to functions to build system capacity. As the state workforce board is comprised of and led by business and industry leaders statewide, the Council is in a unique position to serve the sectors and needs of a diverse state and people. As the following illustration shows, the state workforce board members shall assist the Governor in carrying out these three strategic and operational functions by participation in the following activities:

- Assist in the development and implementation of the State Plan and performance measures;
- Assist in the development of career pathways strategies;
- Assist in the development and expansion of strategies (including outreach and access strategies) for meeting the needs of employers, workers, and jobseekers, particularly through industry or sector partnerships related to in-demand industry sectors and occupations; and
- Assist in the development and alignment of policies.

Some System Capacity Building:

- Strategies to support staff training and awareness;
- Dissemination of best practices; and
- The development and continuous improvement of the one-stop delivery system support for effective local boards.

Aligning Systems and Ensuring Effective Operations across Workforce Programs:

- Assist in the development of strategies for aligning technology and data systems;
- Assist in the development of local area allocation formulas;
- Assist in the development of statewide LMI system; and

- Assist in the development of policies and guidance related to appropriate roles and resource contributions of one-stop partners.

Define the roles and expectations of CWI and Committees.

Examples of activities:

- WIOA Fiscal Oversight;
- Oversight of Workforce Investment Board program outcomes;
- Anticipate employer labor needs while building and strengthening Wisconsin's workforce;
- Support the development of a highly-skilled labor force; and
- Empower individuals to pursue and retain family-supporting careers

Labor Demands: Advise and Assist

- Assist with anecdotal information of local employment needs;
- Assist with an inventory to determine the skills needed by local industry;
- Guide on industry standards and recommend acceptable industry practice;
- Counsel on new developments in technology;
- Review the need of CTE programs in terms of entry-level and middle job skills needed by industry;
- Pilot and test drive programs and services for success; and
- Utilize programs and services needed to advance the workforce.

Strengthen Regional Partnerships

- Visionary Alignment (Workforce, Education and Economic);
- Develop a Common Strategy;
- Create Education and Training Opportunities – Career Pathways;
- Develop strategies that can be accomplished without additional funding; and
- Develop strategies that can be done through existing resources

## 4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP PROGRAM PARTNERS

### A. ASSESSMENT OF CORE PROGRAMS

Each core program's performance in each of the primary indicators of performance will be a starting point for further evaluation of the quality, effectiveness and opportunities for improvement. Each partner program will submit their performance metrics into a statewide dashboard on a quarterly basis. Each partner program will report out to the PAC in their accomplishments, plans/strategies to continue to make improvements, how they address areas that are not being met, and the identification of resources/support they need with moving forward.

The PAC is a statewide committee tasked with advising the WIOA Leadership Team on performance matters. The Performance Accountability Committee is co-led by DWD's Division

of Employment and Training (DET) and Division of Vocational Rehabilitation (DVR) staff and includes representation from all Combined State Plan programs, local WDBs, and the DWD's Division of UI. The WIOA Leadership Team shall provide briefings on these reports to CWI for their review and action.

WIOA's primary measures of performance measure each core program's effectiveness at producing desired outcomes. The DOL's 2014-2018 Strategic Plan explains the performance of "employment and training program depends on both program activities and the Nation's economic conditions". §677.190(a) directs that state and local final adjusted levels of performance each year will take into consideration characteristics of the participants as well as state and local economic conditions through the application of a federal statistical adjustment model. Therefore, the state and local areas will be assessed based on a comparison of the actual performance level with the adjusted level of performance each quarter and annually.

***Levels of Proficiency and Actions***

***"Exceed"***

Condition: If the actual performance in any indicator is greater than 100% of the adjusted level, the measure will be considered to "exceed" the measure's adjusted rate.

Action: This is an indication that the program is providing high quality and effective services. The state or local area is expected to, consistent with economic conditions and characteristics of the participants continue to improve its performance. The programs are encouraged to innovate in service delivery, processes, and practices. An example is to evaluate programs through a process improvement models, such as Lean Six Sigma, process mapping, simulation, or DRIVE.

***"Meet"***

Condition: If the actual performance in any indicator is 90% or more and lower than 100% of the adjusted level, this measure will be determined to "meet".

Action: The program is required to improve its performance to meet 100% of the adjusted rate. The program will continue to improve processes and practices, and to adjust strategies in order to create a higher quality workforce system.

***"At-Risk "***

Condition: If the actual performance in any indicator is more than 50% and below 90% of the adjusted level, the measure will be characterized as "At-Risk". According to the threshold outline in §677.190 (d) (1) each program is required to average at least a 90% average of their indicator scores in order to pass the Overall Program Score criteria. Additionally, the second threshold in §677.190 (d) (1) requires the state's Overall Indicator Score to be an average score of 90% or greater in each indicator across all core programs. In the case of performance characterized as "At-Risk", the individual indicator does not achieve 90% of the adjusted score. This may put the state or local area at risk of failing the Overall Indicator Score and Overall Program Score criteria. Meeting the 50% threshold is only an indicator that the quality and effectiveness of the program in a specific measure meets the minimum standards established by the Federal government in a specific indicator. This performance level is, however, not an indication that the overall quality and effectiveness of the program necessarily met.

Action: The program is required to improve its performance to meet the 90% threshold by improving processes, practices and to adjust strategies in order to create a higher quality workforce system.

***"Fail"***

Condition: If the actual performance in any indicator is less than 50% and the adjusted level, this measure will "fail" the threshold outlined in §677.190(d) (2). This indicates a specific measure requires improvement in order to be compliant with federal standards. It is the minimum standard of the quality and effectiveness of services.

Action: In instances when the state or a local area falls below this threshold, immediate technical assistance will be provided by the appropriate office to improve the proficiency of staff members in providing WIOA services and provide an opportunity to develop strategies to improve the program's ability to meet performance measures.

**Section III, Table 2. Levels of Proficiency and Actions**

| **Levels of Proficiency** | **Levels** | **What is Required** |
|---|---|---|
| Exceed | Indicator Greater than 100% | Innovate and stay on top. Strive for national excellence |
| Meet | Indicator 90-100% | Process and practice improvement, adjust strategies |
| At-Risk | Indicator 50-90% | Technical Assistance available, process and practice improvement, adjust strategies |
| Fail | Indicator Less than 50% | Immediate mandatory Technical Assistance, process and practice improvement. |

***Additional Metrics***

In addition to the primary indicators of performance, secondary metrics may be created and reviewed to assess the activities and performance of a program more fully. The data elements on the WIOA annual state and local report as well as the Eligible Training Provider reports will be reviewed to identify strengths, weaknesses, opportunities, and threats to workforce training programs. Areas for improvement may be identified from these metrics. The state will take into accounts local and regional planning goals into assessments.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

The one-stop operator plays a critical role in assessing all one-stop partner programs. Beyond traditional program-specific performance metrics, the operator will consider how well all of the one-stop partner programs coordinate and integrate service delivery, promote the seamless transition of customers from one partner to another and demonstrate the capacity to meet the needs of customers accessing the one-stop system. Program-specific performance is addressed for core and existing Combined Partner programs. New Combined State Plan Partner programs (DCF, DHS, and DOC) will contribute current program specific performance to the assessment process.

The state PAC will assess the WIOA core program's performance against adjusted values each year. Title I programs, Title II, Title III, Title IV, the TAA Act and Jobs for Veterans State Grant

will be assessed by the WIOA primary indicators of performance. Each program will have goals set through negotiation with the federal government or set internally. The actual performance on the primary indicators of performance will be assessed at the state, regional, and local levels and by service provider.

This assessment will be conducted on a quarterly basis and reported to CWI. The state's adjusted levels of performance and local levels of performance are set with consideration of economic conditions and the characteristics of participants served. These considerations make the adjusted state and local levels of performance adequate standards of quality and effectiveness of the services provided through the workforce system. The assessments are used to focus on areas of improvement of the program's performance. Further disaggregation of participant characteristic and economic data will lead to the identification of root causes in performance success and short comings at all levels and for all programs.

A statewide performance briefing highlighting strengths and weaknesses is provided to state workforce board on a quarterly basis. Dashboards for each program at a statewide, regional and local level will be made available to all WIOA core and partner program through updates on the State's Performance SharePoint site.

C. PREVIOUS ASSESSMENT RESULTS

The PAC used previous the performance results from PY 2017 and PY 2018 to identify strength and weaknesses in its state strategy.

To see the results of our program performance please visit the following websites below. DWD is building its capacity to conduct formal research and evaluation of its programs. The initial assessments were done by reviewing the WIOA Performance reports to determine what areas of strength and weaknesses were using reported data. The programs reviewed the results against the negotiated levels of performance and simulated performance adjustments. Indicators of performance that did not meet the thresholds set in the previous state plan were evaluated more thoroughly to identify opportunities for improvement.

DOL Core Programs

- Program Year 2018 https://www.dol.gov/agencies/eta/performance/results/annual-results#WI
- Program Year 2017 https://www.doleta.gov/performance/results/AnnualReports/annual_report_17.cfm

ED Title II Program

- Program Year 2018 https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/spr/py2018/wisconsin.pdf
- Program Year 2017 https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/spr/py2017/wisconsin.pdf

ED Title IV Program

- Program Year 2018 https://www2.ed.gov/about/offices/list/osers/rsa/wioa/vr-annual-reports/py18-wi.pdf
- Program Year 2017 https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/spr/py2017/wisconsin.pdf

The PAC determined credential attainment was an area of concern for the Title I Dislocated Worker and Title I Youth programs. The PAC determined in PY 2018 that more intensive technical assistance was required. These assessments triggered efforts to further define a Career Planning Taxonomy which allow program staff to focus technical assistance efforts, developing information technology solutions, and provide a more interoperable system between workforce development partners.

Additionally, the assessments inform joint and program specific technical assistance efforts. "WIOA Performance Friday" webinars have been ongoing since PY 2017 with timely topics addressing findings of previous assessments. Each Title has been providing more specific TA to their program staff. Title I made on site visits to each workforce development area (WDA) in PY 2016 and PY 2017. During PY 2018, Title I targeted technical assistance efforts to struggling WDAs. Title I also released a Performance Technical Assistance Guide on the WIOA Performance SharePoint Site to demonstrate how reporting is conducted. The program also demonstrated the Statistical Adjustment Model application for its local areas.

## D. EVALUATION

In accordance with section 116(e), the State of Wisconsin will conduct ongoing evaluations of its core programs. The Data Stewards Workgroup, comprised of members from all WIOA core partners, has established a workplan for moving forward over the next four years with evaluation of WIOA programs:

1. Work with partner agencies to evaluate existing data and determine resources necessary for evaluation
2. Review existing program evaluation processes
3. Develop policies, and procedures for evaluation and research studies
4. Develop guidance on how to identify best practices and process improvement
5. Require outcome measures as part of the development of project proposals

DWD continues to use existing methods of evaluation such as annual compliance program and fiscal monitoring of local workforce development boards, data validation, and performance evaluation.

The WIOA Performance Advisory Committee (PAC), comprised of representatives from each WIOA core partner program, other WIOA partner programs, and local workforce development agencies, established a research agenda for the core programs. The PAC is a joint platform for performance, data, and program experts to provide recommendations to the WIOA Leadership Team on performance accountability implementation, shared performance and continuous improvement activities.

The PAC and all core programs will coordinate evaluations through the Wisconsin WIOA Leadership Team and with the Council on Workforce Investment (CWI) WIOA Committee. Local Workforce Development Boards (WDBs) are represented on the PAC, and CWI WIOA Committee and coordinate evaluations with affected local boards.

The PAC identified topic areas of research and the core programs have begun enacting studies to learn more about relationships between the services. Following are research efforts being conducted by the core programs:

- The Title II AEFLA program has created additional metrics beyond the WIOA performance indicators such as the average number of hours of service an AEFLA participant completes to achieve an educational functioning level gain. Title II is also conducting quantitative research and statistical analysis to explore the associations between postsecondary course success and contextualized learning that integrates ABE/ESL training with occupational skills training.
- The Title I program is assessing the effectiveness of services delivered by the Dislocated Worker and Trade Adjustment Assistance (TAA) Act Program based on employment and earnings outcomes. The program is utilizing the Division of Employment Training's Outcomes Universe with assistance from the Bureau of Workforce Information and Technical Support (BWITS) the effectiveness of Dislocated Worker and TAA training is being assessed. All core programs are developing methods to assess quality of services.
- The WIOA PAC began stakeholder engagement to determine business services indicators that demonstrate quality or value through the delivery of business services.
- The WIOA PAC and core programs will continue to explore customer satisfaction feedback from program participants through customer satisfaction surveys and through the Title IV Statewide Needs Assessment.
- The Jobs for Veteran's State Grant (JVSG) program will assess the effectiveness of Veterans who receive "Comprehensive Assessments". The program will assess using process measures such as referrals to other partner program services and the number of employment plans created by the staff.
- The Title I program will continue efforts to assist students in technical college programs that are "near completers". The assessment is focused on identifying students who are near completing degree requirements and whether Title I services can be leveraged to assist students complete their degree.
- Title IV, Vocational Rehabilitation, conducts evaluation and research projects on its programs on a regular basis:
    - DVR has a Program Evaluation and Quality Assurance Advisory Committee comprised of two Policy Analysts, two staff enrolled in the Performance Evaluation and Quality Assurance (PEQA) Cohort, and several senior managers from DVR. The committee identifies potential quality issues and program evaluation/research studies needing to be conducted.
    - DVR has a Quality Assurance Team (QAT) which meets bi-monthly to conduct quality and compliance reviews on cases to ensure VR policy and procedure is followed. Three large reviews are conducted annually, and an all-inclusive peer case review is conducted bi-annually. Several other smaller reviews are also conducted throughout the year as issues arise.
    - DVR is developing a tool to determine if a statewide service provider is qualified based on established criteria and will implement a qualitative performance review with targeted benchmarks and improvement planning.
    - DVR is currently working with the University of Wisconsin-Madison in reviewing youth data to determine why youth are dropping out of the program at higher rates than other age groups and why it is more prevalent in some regions than others.

- DVR also evaluates its programs by contracting to have a Comprehensive Statewide Needs Assessment (CSNA) conducted every couple of years. DVR staff, consumers, service providers, and WIOA partners provide input for the assessment.

As the federal government conducts evaluations directed in Sec. 169, Wisconsin state and local program administrators will cooperate with evaluation efforts.

## 5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

### A. FOR TITLE I PROGRAMS

#### I. YOUTH ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 128(B)(2) OR (B)(3)

See the attached Wisconsin WIOA Allocation Process (Appendix 2: Allocation Guide).

#### II. ADULT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) OR (B)(3)

See the attached Wisconsin WIOA Allocation Process (Appendix 2: Allocation Guide).

#### III. DISLOCATED WORKER EMPLOYMENT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) AND BASED ON DATA AND WEIGHTS ASSIGNED

See the attached Wisconsin WIOA Allocation Process (Appendix 2: Allocation Guide).

### B. FOR TITLE II

#### I. DESCRIBE HOW THE ELIGIBLE AGENCY WILL AWARD MULTI-YEAR GRANTS OR CONTRACTS ON A COMPETITIVE BASIS TO ELIGIBLE PROVIDERS IN THE STATE, INCLUDING HOW ELIGIBLE AGENCIES WILL ESTABLISH THAT ELIGIBLE PROVIDERS ARE ORGANIZATIONS OF DEMONSTRATED EFFECTIVENESS

The Wisconsin Technical College System (WTCS) is responsible for administering the Adult Education and Family Literacy Act (AEFLA) funds to eligible providers and services that:

1. Assist adults in becoming literate and in obtaining the knowledge and skills necessary for employment and economic self-sufficiency;
2. Assist adults who are parents or family members in obtaining the education and skills that: (A) are necessary to become full partners in the educational development of their children and (B) lead to sustainable improvements in the economic opportunities for their family;
3. Assist adults in attaining a secondary school diploma and in the transition to employment, postsecondary education and training through career pathways;
4. Assist immigrants and other individuals who are English language learners in (A) improving their (i) reading, writing, speaking and comprehension skills in English; and (ii) mathematics skills; and in (B) acquiring an understanding of the American system of government, individual freedom and the responsibilities of citizenship;
5. Align with the skills needed of industries within the state and regional economies;
6. Organize education, training and other services to meet the particular needs of students in a manner that accelerates their educational and career advancement to the extent practicable;

7. Include counseling to support students in achieving their education and career goals. Included is the development of a Personal Education Plan (PEP) that specifies the student's educational functioning level, learning needs, career interests, goals and plans for achieving economic self- sufficiency, indicates links to other resources and education and/or training towards the next steps on a student's career pathway and ensures seamless transitions from program to program (i.e. ABE/ELA to ASE or ASE to postsecondary education, training, and/or employment); and
8. Provide integrated education and training that includes adult education and literacy activities with workforce preparation activities and workforce training for a specific occupation or occupational cluster.

There are two categories of grant funding available which include Comprehensive Services and Special Focus grants.

The Comprehensive Services grants are designed to provide complete and uniform coverage across the state. Providers or consortia must provide comprehensive adult basic education services within a geographic region that equates to one or more WTCS districts (one or more providers may collaborate in how they provide coverage within the district). Available funds for the first year of the three-year grant for each of the geographic regions are specified in the Geographic Region Allocation table shared below.

**Section III, Table 3. AEFLA Comprehensive Services Regional Funding Chart**

| Regional No. | Regional Name |
|---|---|
| | Chippewa Valley |
| 02 | Western |
| 03 | Southwest |
| 04 | Madison |
| 05 | Blackhawk |
| 06 | Gateway |
| 08 | Waukesha County |
| 09 | Milwaukee |
| 10 | Moraine Park |
| 11 | Lakeshore |
| 12 | Fox Valley |
| 13 | Northeast |
| 14 | Mid-State |
| 15 | Northcentral |
| 16 | Nicolet |
| 17 | Wisconsin Indianhead |

The Special Focus grants funding will be awarded to eligible providers with grant awards ranging from $25,000 to $85,000 depending on the proposed number of students served and reported to the National Reporting System (NRS) through the WTCS Client Reporting System. Learners qualifying for NRS enrollment must have 12 hours of instruction and an approved pre-test score. Grant requests should be proportional with the number of students served. Consider the recommendations in the chart below for Special Focus Applications. An eligible provider is limited to two (2) applications under this category.

**Section III, Table 4. Special Focus Grants**

| NRS Enrollment | Qualifying Award |
|---|---|
| 25-49 | $25,000 |
| 50-99 | $25,001-$54,999 |
| 100 or more | $55,000-$85,000 |

The funds will be available for a four-year period in the next grant cycle (the current grant cycle was three years). The first year will be on a competitive basis. To receive continuation funding after year one, awarded providers will need to submit an updated application each year and be in full compliance with all the requirements. Awarded providers will receive annual awards for the July 1 – June 30 timeframe during the duration of their grant.

WTCS is able to establish that eligible providers are organizations of demonstrated effectiveness by requiring all applicants to demonstrate past effectiveness in providing adult education and literacy activities by providing performance data on its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, English language acquisition and other subject areas. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent and transition to postsecondary education and training. A form has been created for applicants to complete and provide evidence of their ability to improve the skills of adults with low-level literacy skills and/or English language learners.

## II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS TO ALL ELIGIBLE PROVIDERS TO APPLY AND COMPETE FOR FUNDS AND HOW THE ELIGIBLE AGENCY WILL ENSURE THAT IT IS USING THE SAME GRANT OR CONTRACT ANNOUNCEMENT AND APPLICATION PROCEDURE FOR ALL ELIGIBLE PROVIDERS

To ensure direct and equitable access for all eligible providers to apply and compete for funds, WTCS takes into consideration the following thirteen (13) criteria while scoring applications:

1. The degree to which the eligible provider would be responsive to:
    a. Regional needs as identified in the local workforce development plan; and
    b. Serving individuals in the community who were identified in need of adult education and literacy activities, including individuals who:
        i. Have low levels of literacy skills; or
        ii. Are English language learners.
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy and the degree to which those improvements contribute to the eligible agency meeting its state-adjusted levels of performance for the primary indicators of performance described in Section 677.155;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local workforce board plan under Section 108 of the Act, as well as the activities and services of the one-stop partners;

5. Whether the eligible provider's program:

    a. Is of sufficient intensity and quality and based on the most rigorous research available so that participants achieve substantial learning gains; and

    b. Uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available, including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technologies, services, and delivery systems, including distance education, in a manner that is sufficient to increase the amount and quality of learning and how such technologies, services, and systems lead to improved performance;

8. Whether the eligible provider's activities provide learning in context, including integrated education and training, so an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by instructors, counselors and administrators who meet any minimum qualification where applicable and who have access to high-quality professional development, including electronic means;

10. Whether the eligible provider coordinates with other available education, training and social service resources in the community, such as establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, Local Workforce Development Boards (WDB), one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations and intermediaries in the development of career pathways;

11. Whether the eligible provider's activities offer flexible schedules and coordination with federal, state and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (Section 666.100) and to monitor program performance; and
13. Whether the local area in which the eligible provider is located has a demonstrated need for additional English language acquisition programs and civics education programs.

In addition to the 13 considerations mentioned above, WTCS holds pre-application conferences for eligible providers/applicants to attend and learn more about the AEFLA grant guidelines. This will be offered again in Spring 2020 for the next four-year grant cycle.

To ensure that WTCS is using the same grant or contract announcement and application procedure for all eligible providers, the AEFLA grant guidelines, application forms, and documents were shared on http://publicnotices.wi.gov and on https://mywtcs.wtcsystem.edu/grants/adult-education-family-literacy-(aefl)/guidelines. The AEFLA grant guidelines contains information regarding the grant application submission process, the application requirements, the application review and scoring process, the appeal procedures, and the revision process for a funded application. Eligible providers were able to submit applications for funding considerations following the guidance provided in the AEFLA grant guidelines.

### C. VOCATIONAL REHABILITATION PROGRAM

Wisconsin has chosen to have a combined state agency.

Wisconsin DVR provides many vocational rehabilitation services for core programs through contracted statewide service providers.

## 6. PROGRAM DATA

### A. DATA ALIGNMENT AND INTEGRATION

**Data Governance:** The previous four years the Wisconsin WIOA State Plan Partners worked to establish data governance and create a vison for Collaborative IT projects to support a workforce system in alignment and one that provides an efficient, seamless customer experience.

The governance is made up of a Data Steward Committee and the Data Governance Rules of Order used by the WIOA Leadership Team (WLT) when deciding or ruling on data governance issues and projects. The purpose of the governance is to ensure WIOA Data, although submitted separately, is trusted, understood, meets business needs, and provides accountability to the system rules and policies. This work in the prior plan included establishing a WIOA data dictionary that includes outlining the meta data each agency must capture to outline the process and quality descriptions for all data used in the creation of individual core program statewide performance reports. This governance also provides the vehicle to process and approve collaborative IT and data sharing solutions. Going forward this group with WIOA Leadership Team authority, will continue to maintain the data dictionary and processes to approve collaborative IT and data sharing solutions. This will include training the new State Plan Partners of SNAP, TANF, and DOC on the dictionary and meta data needed to be gathered and maintained and the WLT Data Governance Rules of Order for raising and approving any work related to data or data governance. During the PY20-23 State Plan period, participating state plan partners have the option to join the Data Governance Rules of Order and the individual

data integration projects. References in this section, "Program Data" to "participating partners" or "participating agencies" highlights the option State Plan Partners have to opt out of any integrated data or data governance planned actions.

**Policy and Guiding Principles Team and Communications Team:** The cross-agency teams that drive any business requirements for IT solutions comes from these two teams. They are responsible for identifying and making staff aware of, or establishing and training staff on best practices or policies for integrated or coordinated service delivery, including co-enrollment and referral practices.

**How they work together?** The Policy and Guiding Principles Team and the Communications Team highlight what functionality the IT or data sharing systems need to support, the Data Steward Team researches and works with IT staff to identify possible IT collaborative solutions and the Data Governance Rules of Order used by the WIOA Leadership Team, establish the voting structure to approve collaborative IT work.

- Co-manage cases (leveraging resources) as appropriate;
- Make appropriate referrals to core and partner programs;
- Report federal deliverables and evaluate programs; and
- Improve the customer experience.

Four Areas of Focus for Collaborative Technical Work for Participating Partners:

- **Systems will support sharing information to improve the process, leading to improved outcomes.** This includes business and technical solutions to improve coordinated services, reduce duplication and leverage individual program strengths and resources to improve the overall customer experience.
    - One of the IT solutions participating partners will focus on is to make the referral process and co-managed cases more efficient and streamlined for the customer.
        - Based on initial technical research, it was determined the best place to build a common IT solution to support more integrated or streamlined service was at the referral process. This includes an electronic system to support making referrals between agencies to reduce the duplication of questions and streamline the customer experience, as well as provide a spectrum of support to connect the referred person to the referral agency.
        - The long-term goal is for this system to support appropriate sharing of individual program information between staff for co-enrolled individuals.
        - In all cases where PII and programmatic information is exchanged at the individual level, data policies will enforce, and electronic systems will be designed, to provide the informed choice to the customer, where they are not only made aware of the sharing, but also have the option to opt in or out of sharing at this level.

- **Systems will support combining data to create cross program reports.** The specific reports are controlled by the WLT using the Data Governance Rules of Order to plan, coordinate and complete work on any statewide combined data reports. One example of this reporting is the co-enrollment reports that Title I, III, IV, TAA, and JVSG programs have collaborated to create. These reports include the ability to see co-enrollment by program and locations. They can also filter by Program Year, and separate co-enrollment by reportable and participant status of the individuals. In the PY16-19 State Plan these reports were developed with all of the State Plan partner programs, and tested, but were not released for use by the partners for any data other than the Title II required co-enrollment reporting. During the PY20-23 State Plan timeframe we will work on removing Title II data from the reports, establishing report terms of use for participating agencies, and adding new State Plan partners as appropriate.
- **Systems will support, where possible and appropriate, automated gathering of data elements that are required at intake and for outcomes reporting.** The goal is to reduce staff and customer time on administrative tasks and improve data quality by finding quality sources of data, establish appropriate data sharing agreements, and use these systems to collect of specific intake and/or outcome required data elements.
    - During the PY16-19 State Plan, DWD worked to establish a data sharing agreement with the National Student Clearing House (NSCH) and establish an automated exchange of information. In the PY20-23 State Plan, these data will flow into the IRIS case management system and the ASSET case management system to populate postsecondary information including graduation and credential attainment.
    - During the PY20-23 State Plan participating partners plan to build on this success and automate the core program data elements related to co-enrollment. Title I, III, IV must report on the individual level if the person is receiving services from one of the other WIOA core programs. The goal is to establish data sharing agreements and IT systems to automate this data element through a data exchange process potentially eliminating the need for the customer to self-report.
    - After participating partners automate core program elements, the next step will be to work with DPI and other state agencies to automate other sources of information.
- **System will work to support program evaluations.** This not only includes making data, as appropriate, available for research, but also to establish processes for requesting, approving and completing evaluations to identify effective interventions and successful service strategies.
    - During the PY16-19 State Plan, participating agencies worked to create a data governance process and policy for creating, submitting and approving evaluation proposals and corresponding data projects that use combined data while following all appropriate data security and protection laws. During this State Plan, participating agencies will carry out this evaluation project and publish findings.
    - DWD has received a WDQI grant. This funding will be used to establish the Workforce Data Integration System that allows participating partners to more

efficiently tie data for operational and evaluation purposes including:

- technical work to make evaluations easily repeatable and efficient
- allowing evaluations that include a broader spectrum of source data that will link between systems including UI wage and claim data, as well as WIOA Program Data and non-WIOA workforce data including Registered Apprenticeship and Youth Apprenticeship program and the Wisconsin Fast Forward Program.
- establish processes to request and approve data for evaluations or research, and a process to review and approve the findings prior to publishing.

**Linking Source Records:** To facilitate the above projects, the WIOA Partnership with DWD acting as lead agency, has procured a licensee for a tool that matches individuals between different source systems. This matching solution does not require the systems gather the same PII type or format, and it is not dependent on Social Security Number. It uses sophisticated algorithms and the most up to date name matching technology. This tool may be used, as appropriate and allowed by data security rules, policies and data sharing agreements, between participating agencies' data systems to provide the link between individual source system records to support data sharing in both reporting and real time applications. Work with happen in this State Plan to plumb the tool, as appropriate to participating partners' source systems.

The current planned IT projects for Wisconsin "Common Intake" System:

This tool above will be used for specific data sharing between participating partners. This includes sharing data between the electronic case management systems of participating partners to identify if a participant is already working with another partner, the ability to make and track electronic referrals between participating partners, and the ability to collect basic information from other systems to help streamline the customer experience for those customers who work with more than one partner agency. The matching tool will combine data between participating partners to generate co-enrollment reports to enable an evaluation of the impact of co-enrollment. The matching tool will reduce the number of duplicated records, created through human error, in the participating program's management information system to maximize data quality. The participating programs will identify reliable data sources from third parties to automate collection of required data elements to reduce customer and staff burden.

See Section III. b. 6. A. i.

See Section III.b.6.A.i.

<u>State and Local Federal Report</u>

Title I, III, JVSG, and TAA programs report via ETA's Participant Individual Record Layout. The PIRL file extract is constructed created via several automated batch processes. The participant data is provided through a set of batch programs which pull values from the state's participant management information system (MIS) named Automated System Support for Employment Training (ASSET) to populate the data elements in the PIRL. The employment and earnings data elements are augmented with two sources, the state's unemployment insurance wage records and from the Wage Record Interchange System (WRIS) and when available the State Wage Interchange System (SWIS) for out of state unemployment insurance wage records. Educational

data from the National Student Clearinghouse augments career planner reported credential and enrollment information. The PIRL extracts will be run on a monthly basis. The PIRL is submitted to the federal Department of Labor (DOL) Workforce Information Performance System (WIPS). Upon successful passage of the file, the WIOA Title I, III, TAA, and JVSG directors must approve the ETA 9172 prior to certification by information technology staff.

Effectiveness in Serving Employer Report

The effectiveness in serving employers reports are constructed via SAP Business Objects data warehouse. The two pilot indicators are calculated using logic from the WIOA Effectiveness in Serving Employers Data Elements: Employer Penetration Rate & Repeat Business Customers. The performance outcomes are determined consistent with the procedures outlined in state policy (https://dwd.wisconsin.gov/wioa/policy/11/11.5.9.htm). The effectiveness in serving employers report will be included on the WIOA Title III Wagner Peyser ETA 9173. The WIOA Title I, III, IV, TAA, and JVSG directors must approve the reporting of the effectiveness in serving employers indicators.

Title II

Wisconsin's Title II program has developed a statewide reporting system for data collection of WIOA Adult Education and Family Literacy Act (AEFLA) participant and reportable individual information. Title II providers supply data through the reporting system on an ongoing basis within the program year. Each data submission is processed through a series of data edits to ensure data accuracy and integrity. Data quality reports are made available to Title II providers and must be corrected before the annual closing of the reporting system. Title II has enacted a series of data sharing agreements to obtain the necessary follow-up data to calculate the federally required WIOA indicators of performance. Data sharing agreements have been made in coordination with the National Student Clearinghouse, the K-12 Department of Public Instruction, and the state unemployment insurance wage record system. Data matches are conducted annually, and matched data is integrated within the Title II data system in alignment with producing the reports required under section 116, and reported through the US Department of Education, Office of Career, Technical, and Adult Education's National Reporting System on an annual basis.

Title IV

Wisconsin's Title IV program, the Division of Vocational Rehabilitation (DVR) has developed a custom case management system, IRIS, for data collection which incorporates data validation rules to ensure accuracy. IRIS interfaces with the state's unemployment insurance wage records system to retrieve employment and earnings data elements for the purposes of Federal reporting.

IRIS is integrated with a sophisticated reporting platform which was established to transform and visualize DVR performance data. DVR utilizes these tools to produce Wisconsin's quarterly RSA 911 and annual ETA 9169 report and leverages this framework for all other reporting needs. Additionally, DVR has partnered with other WIOA Title programs to produce reports on co-enrolled clients.

## B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

The core programs will use UI wages, National Student Clearinghouse (NSCH) data, and their provider system follow up reports to assess the client's employment, earnings, and educational progress. The programs that conduct follow-up have been trained to coordinate with other programs to ensure duplicate contacts with participants is minimized. Title I and Title IV will

use a shared solution to incorporate NSCH educational enrollment and outcome data. The core programs will pull business intelligence reports to analyze and assess post program success by looking at employment, earning, and educational outcomes.

Wisconsin's core WIOA programs will initially assess the effectiveness of its core programs using the WIOA Primary Indicators of Performance. The state will not incorporate formal additional indicators of performance, but the programs will review metrics designed to meet their needs such as employee retention by the same employer. These indicators would be coordinated through the Performance Advisory Committee. At a macro-level, the indicators of performance provide an initial indication of the state workforce system's effectiveness at achieving its vision and goals. The state will develop a common dashboard of federal performance results and display on its WIOA Performance SharePoint site. Core and partner programs will assess its performance based on the adjusted levels of performance. Areas of strength and improvement will be distinguished by reviewing current performance and performance trends. Program managers, at all levels, will use these quarterly assessments to further target assessments and to determine root causes for strong and weak performance.

## C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

Systems will support exchanging data in order to meet federally required reporting the specifics of which are detailed in Data Sharing Agreements and Memorandums of Understanding executed by involved parties that exchange this data for WIOA federal reporting. One example of this data exchange is co-enrollment reporting. In this State Plan DWD will work on establishing terms of use for data exchanges and other reports between current participating partners, and potential new State Plan partners.

Another example of this reporting is the collaborative data sharing between WTCS and DWD to produce the needed information for the Eligible Training Provider Lists. WTCS is providing the aggregate level reports for their individual technical colleges, and DWD is working with the non WTCS training providers to provide individual level data for WIOA and non-WIOA participants, which we will append with UI wage information. This information, together with our WIOA Participant data, will be combined behind the scenes to create easy-to-read report cards on our training providers. In the prior plan, these systems were developed and released into production. In this State Plan, we will work on reviewing the report cards and determine if there is need for improvement, as well as ensure that all staff are trained on the reports and use them for informed choice discussions with individuals we serve.

The core programs will continue to utilize quarterly UI wage records for performance accountability, evaluations consistent with federal and state law, through Data-Sharing Agreements (DAS). DWD's Division of Unemployment Insurance (UI) currently has DSAs for such purpose with the DWD Divisions of Employment and Training (DET) and Vocational Rehabilitation (DVR), as well as with WTCS. Those DSAs are updated as necessary to reflect changes in federal and state laws. The core programs are considering using the State Wage Interchange System (SWIS) for out of state records. "If agreed upon after consideration, the core programs will utilize the SWIS once the appropriate State Access PACIAs and SUIAs sign the national agreement." DET has UI data integrated into its Job Center System (JCS) to satisfy federal reporting requirements, allow for validation of reported data, and is incorporated into the JCS2 Data Warehouse for participant outcome analysis and research.

One of the core data sets in Wisconsin's Workforce Data Integration System that is being established with the WDQI funds during this State Plan Period is DWD UI wage warehouse. One of the long term goals of the establishment is to improve the capability and capacity of the

partners to do program evaluation and research and build evidence for policy and program development.

## D. PRIVACY SAFEGUARDS

Data and information collected under the programs administered by DWD and WTCS containing confidential and/or personally identifiable information (PII) is required to be safeguarded. This includes programs under Titles I, II, III, and IV and other required one-stop partner programs. Data and information controls promulgated by federal and/or state law, workplace rules, and policy are designed to assure confidential information is protected throughout its lifecycle from collection through final disposition. Security controls govern processes, procedures, data systems, information release, and audits. Security standards apply to all users granted access to data and workforce information systems, including, but not limited, to State of Wisconsin staff, agency partners, vendors, and/or contractors who provide workforce development services. State agencies have policies and procedures to ensure and enforce coordination, compliance, organizational roles, physical security of equipment, logical computer access control, confidentiality, and information security.

## 7. PRIORITY OF SERVICE FOR VETERANS

Since the enactment of the Jobs for Veterans Act in 2002, Priority of Service has been established in the State of Wisconsin under policy guidance issued by the Wisconsin Department of Workforce Development. Priority of Service, as required by 38 U.S.C § 4215 and 20 C.F.R. 1001 and 1010, is provided to ensure veterans and covered persons receive consideration for all opportunities, for which they qualify, funded in whole or part by the U.S. Department of Labor. After receipt of state policy, local areas are required to develop internal veterans' Priority of Service policies and implement them in their local plan. Each year they are required to submit their local policy to the Local Program Liaison (LPL) for review, particularly when changes have been made. The Priority of Service regulations require that local AJC's implement policies and procedures that:

- Identify veterans and eligible spouses at point of entry (physical locations, web sites, and other virtual service delivery resources);
- Advise veterans and eligible spouse of their entitlement to Priority of Service;
- Make veterans and eligible spouses aware of the full array of employment, training and placement services available; and
- Identify applicable eligibility requirements for programs and services.

Services are made available and provided to eligible veterans, transitioning service members, Chapter 31 veterans, Native American veterans, and other groups targeted for special consideration like significantly barriered veterans on a priority basis.

Veterans or covered persons who enter our workforce system via a local Wisconsin Job Center office are made aware of their entitlement to Priority of Service by signage posted in the local office. The signage advises veterans of their entitlement for Priority of Service and directs them to speak with workforce center staff regarding their eligibility for Priority of Service and the eligibility requirements for a program or service.

The Job Center of Wisconsin locations that operate programs which deliver services to the public without targeting specific groups, apply veterans and eligible spouses Priority of Service over all other program participants. The primary universal access services are the "core"

services delivered through the Job Center staff under the Wagner-Peyser and WIOA programs. Veterans and eligible spouses receive the first level of priority in universal access programs.

The demonstration of Priority of Service is the responsibility of AJC staff. It is also the responsibility of the state and local leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance, and monitoring accomplished by the Local Veteran Employment Representative (LVER), DWD-DET Monitors, State Veterans Program Coordinator, State Regional Job Service Directors, and Veteran Program Managers. Methods and means used to verify whether Priority of Service is being provided will be the following but are not limited to:

- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits

Regarding the referral process for veterans with significant barriers to employment to Disabled Veteran Outreach Program specialists, the local American Job Center (AJC) staff is responsible for providing an initial assessment at the physical workforce center point of entry. This process that is conducted for the purpose of determining whether a service member, veteran and/or eligible person is eligible to receive DVOP services. SBE eligible veterans and/or other eligible persons may be referred for DVOP services only after they have received an initial assessment to address and determine their level of need. This part of the assessment includes, but is not limited to, verifying the accuracy of information provided during registration, and determining the basic job readiness and the extent of AJC services needed by the individual.

Once a service member, an SBE veteran or other eligible has been deemed appropriate for DVOP services, the AJC staff member then notifies the DVOP specialist either through email, phone or physically walking the individual over to the DVOP specialist. The AJC is ultimately responsible for providing employment services to all registered individuals who are seeking assistance. The intent for assigning DVOP and LVER staff to the AJC is to supplement and not supplant the duties of the AJC staff when providing services to veteran customers. In addition, in offices where no DVOPs are stationed, the AJC staff is expected to provide the same level of needed individualized career services while providing the service member, veteran and/or spouse the option of making an appointment to be seen by a DVOP specialist during a scheduled meeting.

Veteran's Priority is mandated on all job postings. Federal law requires that veterans receive priority in job referrals. This means that all veterans have an opportunity to view the job opening before non-veterans. To accomplish this, a 24-hour hold is placed on each job posting, with an option to expand beyond 24 hours. Registered veterans using Job Center of Wisconsin, whether in a Job Center or on the Internet, can see jobs on Veteran's Priority. This allows veterans who have the required skills and meet the required qualifications to be identified and contacted as suitable candidates before being released for review by non-veterans.

Employers registered in JCW can conduct a candidate search and filter results for veterans. Registered veterans are indicated by an American flag icon on the results grid.

## 8. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WITH DISABILITIES

The one-stop delivery system's compliance with Section 188 of WIOA and applicable provisions of the ADA are ensured through the State of Wisconsin's Nondiscrimination Plan required by 29 CFR 38.54 of the Workforce Innovation and Opportunity Action of 2014 (WIOA) and is in effect through December 31, 2020.

All contract awards made by DWD-DET under WIOA Title I financial assistance programs and services include assurance language obligating local elected officials (LEOs) and local recipients to comply with the nondiscrimination and equal opportunity provisions.

DWD-DET requires that all one-stop workforce development system recipients of WIOA Title I federal financial assistance, designate a local equal opportunity (EO) officer, who is responsible for coordinating the local recipient's nondiscrimination and equal opportunity program. The local EO officer is responsible for monitoring and investigating the local recipient and subrecipient activities, to ensure that they are not violating nondiscrimination and equal opportunity requirements under WIOA Title I. The EO officer is charged with reviewing the local recipient's written policies and procedures annually, to make sure that those policies are nondiscriminatory. DWD-DET's current MOA requires the local EO officer to provide civil rights training to the recipient's staff to ensure subrecipient staff responsible for administering the WIOA program receive training on how to provide programmatic and physical accessibility to applicants/registrants, participants, and applicants for employment. Requiring the local EO officer to review and provide training to recipient and subrecipient staff helps ensure compliance with WIOA programmatic accessibility requirements.

As required by WIOA, local boards must assess and certify the one-stop delivery system and its comprehensive and affiliate Job Center locations at least once every three years for all programs in the workforce system. DWD-DET, as the WIOA lead partner for Wisconsin, issued the One-Stop Delivery Self-Certification document, One-Stop System Checklist, and a Job Center Checklist in the Spring of 2019. Job Center certification requires the following physical and programmatic accessibility documents:

- ADA Accessibility Checklist (every 3 years)
- Section 188 Checklist (annual)
- Section 508 (every 3 years)
- Website Accessibility (annual)

The number of Certified Job Centers as of July 1, 2019: 23 Comprehensive, 30 Affiliate, and 4 Other (57 total)

DWD-DET does annual on-site WIOA Equal Opportunity Monitoring of local workforce boards, including accessibility reviews of job centers. The Civil Rights Compliance and Equal Opportunity Nondiscrimination Monitoring Review Guide for 2018 – 2020 includes the following elements:

- Element 1: Designation of EO Officer
- Element 2: Notice and Communications
- Element 3: Assurance
- Element 4: Universal Access

- Element 5: Compliance with Section 504 of the Rehabilitation Act of 1973 and The American with Disability Act of 1990
- Element 6: Data and Information Collection and Maintenance
- Element 7: Primary Recipient's Compliance with Monitoring Subrecipients Civil Rights Compliance Requirements
- Element 8: Complaint Processing Procedures
- Element 9: Corrective Action/Sanctions

The focus of the on-site review is to determine compliance with civil rights, equal opportunity and non-discrimination requirements, and to review significant differences or disparities identified during the desk review. The reviewer meets with the local equal opportunity officer to discuss the scope of the review, make arrangements for client and provider staff interviews or file reviews, and discuss preliminary findings of the data analysis form the desk review. Walk-through inspections of most job centers are conducted during the review to confirm comprehensive and affiliate job center sites are physically and programmatically accessible to individuals with disabilities.

The Consolidated Monitoring Team (governance, program, fiscal and equal opportunity) conduct an exit meeting with the local EO officer and local workforce board staff to discuss positive practices, areas of concern, findings, and corrective action measures. A written report is issued to the local workforce director with a 'cc' to the local WDB Chairperson and Chief Elected Official within 45 days of the monitoring review. The workforce board must respond with their corrective action measure(s) within 45 days of receipt.

Trainings needs are identified during monitoring and offered to provider staff on an "as needed" basis. Types of trainings include a DWD-DET sponsored "Beyond Performance Friday" webinar twice each month. Title IV staff have co-presented the following topics: Credentials, a Roundtable providing the attendees information about the core partner programs, and measurable skill gains. DWD-DVR has provided staff training to all WIOA partners at WIOA Roundtables on disability awareness including accessibility, the DVR talent pool, innovative business services and other topics related to customer service for individuals with disabilities seeking employment.

Equal access is ensured by utilizing available technologies, providing accommodations, and making materials available in alternate formats. Local WDBs train job center staff to use multiple resources and tools. Job centers include accessible workstations with assistive technologies. Video Remote Interpreting (VRI) is used for sign language interpretation at job centers. Local WDBs develop and implement plans to remove physical accessibility barriers and continuously evaluate and improve service delivery. Nondiscrimination and accessibility statements are used on publications and websites, which include identification of TTY/TDD numbers. Websites are regularly reviewed for accessibility.

## 9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE ENGLISH LANGUAGE LEARNERS

DWD-DET is committed to ensuring that the one-stop delivery system is accessible to all individuals. Local WDBs take reasonable steps to provide English Language Learners (ELL) with meaningful access to their programs and services.

To ensure effective services to all customers, local WDBs are responsible for periodically completing an analysis of the area's limited English proficient (LEP) population. Each local WDB must develop a comprehensive language assistance policy. Resources for obtaining oral interpretation and written translation are made available to program staff, and program staff are trained on these procedures.

Local WDBs collect the preferred language of each applicant, registrant, and participant. For languages spoken by a significant number or portion of the population eligible to be served, or likely to be encountered, vital documents (hard copy or electronic) are translated to appropriate non-English languages. A "Babel notice" is attached to vital documents that are not translated, which includes multiple languages and informs the reader that the communication contains important information and translation will be provided at no cost.

Local WDBs develop affirmative outreach plans and activities for various groups, including LEP communities, such as advertising and engagement with community-based organizations. Participants in need of ELL services are referred to training providers, such as local technical colleges, literacy councils, and local community-based organizations.

Local EO officers review and monitor access to services and train staff to serve LEP customers. The DWD-DET EO officer provides ongoing technical assistance and monitors the accessibility of programs and services of the local WDBs and their subrecipients as part of the annual on-site monitoring.

## IV. COORDINATION WITH STATE PLAN PROGRAMS

The Combined State Plan programs in Wisconsin have been involved in WIOA planning and coordination since WIOA's enactment in July 2014. Leadership of the Combined State Plan programs has participated in the WIOA Review Committee, which is now titled the WIOA Leadership Team. Combined state plan program staff were engaged through WIOA Implementation workgroups and continue to provide valuable input on multi-agency teams reporting to the WIOA Leadership Team.

The workgroups include representatives from one-stop partner programs. Focus groups were conducted with partner staff that assisted with the development of the goals and strategies of the workforce development system.

Efforts to coordinate the development of the PY20-23 Combined State Plan began in Spring 2019. DWD Secretary Frostman convened new plan partners' cabinet-level leadership to discuss joining the State Plan as part of Governor Evers' goal of "connecting the dots." DHS, DCF, and DOC are new partners for this plan. Following the meeting, DWD organized a WIOA State Plan Kickoff Meeting in June 2019 with new partners in attendance.

The WIOA Leadership Team, along with participants from new State Plan partners, worked together on draft versions of the vision, goals, and strategies in Section II and all partners as well as WIOA Implementation workgroups contributed to the development of Section III. Each program had the opportunity to review and comment on these plan sections prior to the publication for public comment.

## V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

| The State Plan must include | Include |
|---|---|
| 1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts; | Yes |
| 2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes; | Yes |
| 3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; | Yes |
| 4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public;<br>(b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; | Yes |
| 5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; | Yes |
| 6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); | Yes |
| 7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; | Yes |
| 8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; | Yes |
| 9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; | Yes |
| 10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA); | Yes |

| The State Plan must include | Include |
|---|---|
| 11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and | Yes |
| 12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. | Yes |

# VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

## PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

### A. GENERAL REQUIREMENTS

#### 1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

Wisconsin has identified two planning regions.

- Planning Region A: Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha Counties
- Planning Region B: Brown, Calumet, Door, Florence, Fond du Lac, Green Lake, Kewaunee, Manitowoc, Marinette, Menominee, Oconto, Outagamie, Shawano, Waupaca, Sheboygan, Waushara, and Winnebago Counties

The Governor's Council on Workforce Investment approved of the planning regions on February 13, 2018.

**Workforce Development Areas (WDAs)**

Wisconsin's state policy on local area designations is DWD-DET Admin Memo 15-04, which is posted at: https://dwd.wi.gov/det/adminmemos/pdf/2015/1504_w_attach.pdf

Wisconsin has approved the designation requests for 11 WDAs depicted in Table 1.

It is expected that federal funding will continue to decline over the upcoming years. A continued decrease in funding will require pragmatic conversations as to the sustainability of maintaining eleven local workforce areas and associated local boards.

**Section VI, Table 1. Wisconsin Local Areas**

| Local Areas | Name | Counties |
|---|---|---|
| WDA 1 | Southeast | Walworth, Racine, Kenosha |
| WDA 2 | Milwaukee | Milwaukee |
| WDA 3 | WOW | Washington, Waukesha, Ozaukee |
| WDA 4 | Fox Valley | Waupaca, Waushara, Winnebago, Calumet, Green Lake, Fond du Lac |
| WDA 5 | Bay Area | Florence, Marinette, Oconto Menominee, Shawano, Outagamie, Brown, Manitowoc, Sheboygan, Kewaunee, Door |
| WDA 6 | North Central | Vilas, Forest, Oneida, Lincoln, Langlade, Marathon, Wood, Portage, Adams |
| WDA 7 | Northwest | Douglas, Burnett, Washburn, Sawyer, Rusk, Price, Taylor, Ashland, Iron, Bayfield |
| WDA 8 | West Central | Polk, Barron, St, Croix, Dunn, Chippewa, Clark, Eau Claire, Pepin, Pierce |
| WDA 9 | Western | Buffalo, Trempealeau, Jackson, La Crosse, Monroe, Vernon, Crawford, Juneau |
| WDA 10 | South Central | Marquette, Sauk, Columbia, Dodge, Dane, Jefferson |
| WDA 11 | Southwest | Rock, Green, Lafayette, Grant, Iowa, Richland |

Local Area Subsequent Designation

Initial designation of local workforce areas was done in compliance with Section 106(b) of the Workforce Innovation and Opportunity Act (WIOA) and DWD-DET Administrator's Memo 15-04. All 11 workforce development boards that were designated as local areas under the Workforce Investment Act of 1998 (WIA) were designated under WIOA. All 11 workforce areas met the "performed successfully" and "fiscal integrity" criteria.

In subsequent State Plan periods, DWD will apply "Performed Successfully" as defined by §679.260 (b) of the WIOA Rules. For the purpose of subsequent designation "performed successfully" means the local area met or exceeded the levels of performance the Governor negotiated with Local Board and Chief Elected Offficials for core indicators of performance described at WIOA Section 116(b)(2)(A). For subsequent designations made at the conclusion of PY18, or at any point thereafter, a finding of whether a local area performed successfully (met or exceeded negotiated performance standards) must be based on all six of the WIOA indicators of performance as described at §677.155(a)(1)(i) through §677.155(a)(1)(vi) for the two most recently completed program years.

It also requires the Governor to have defined the terms ‘‘met or exceeded’’ and ‘‘failure’’ in the State Plan. The terms "met or exceeded" and "failure" are defined in (b)(4)(A) (Assessment and Evaluation of Program and One-stop Program Partners) in this State Plan.

DWD will analyze performance results and make a recommendation on subsequent designation to the state workforce board (CWI). CWI will make the final determination of subsequent area designation.

For the purpose of subsequent designation, DWD will determine if local areas sustained "fiscal integrity" by preparing a risk analysis for each local workforce board with presentation on to the Council on Workforce Investment (CWI) for their review and approval. The risk analysis will include a review of the PY17 and PY18 DWD on-site fiscal monitoring results as well as an analysis of their annual independent audit report results. The analysis will identify any findings, disallowed/questioned costs, type of audit report issued, and whether the local workforce boards were a high or low risk auditee. While we recognize USDOL as authority to determine fiscal integrity, we believe the state has a monitoring role in this with responsibility to inform USDOL if we see fiscal concerns. Based on the risk analysis results, CWI will determine if USDOL should be notified of possible fiscal integrity issues. USDOL will determine if fiscal integrity was sustained. Under Section 679.250(a) and (b), the term "sustained fiscal integrity" means that the Secretary has not made a formal determination that either the grant recipient or the administrative entity of the area mis-expended funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the 2-year period preceding the determination.

If a local area no longer seeks subsequent designation, the chief elected official(s) shall provide written notice to the State Board no later than June 30, 2023 (and every four years thereafter) indicating their intent to no longer be designated as currently structured. If the State Board does not receive such notification; the local area will be assumed and considered to have requested subsequent designation per section 106 (b)(3) of WIOA and 20 CFR 679.250. Existing local areas are not required to submit requests for subsequent designation. On or before October 30, 2023 (and every four years thereafter) the State Board will review the criteria for subsequent designation for local workforce development areas seeking such designation. Under section 106 (b)(3) of WIOA, the State shall approve subsequent designation of a local workforce development area which meet the criteria for subsequent designation. The State will notify the chief elected official(s) within 30 calendar days after the review indicating approval or denial of subsequent designation of the local workforce development area Designations will become effective on July 1 of the following program year.

At any time the Chief Elected Official and Local Board from any unit of general local government or combination of units may submit a request for designation of a new workforce area.

Planning Regions

WIOA envisions a workforce development system that focuses on both job seeker and employer customers and is able to anticipate and respond to the needs of regional economies. To achieve that responsiveness, WIOA emphasizes a variety of approaches developed over a number of years prior to its passage, including regional approaches for the following:

- Creating and using labor market information, including real-time LMI;
- The marriage of Sector Strategies with Career Pathways;
- Work based learning, especially Apprenticeship and OJT;
- Technical college collaboration;
- Business services organized and delivered in a unified manner, across jurisdictions and disciplines;
- Emphasis on solid partnerships at the strategic level, especially with economic development;

- Emphasis on real integration at the service delivery level, especially with community colleges, and across workforce areas; and
- Change in local workforce board size and structure, so as to make the above more feasible.

Based on labor market information, Wisconsin has identified the following WIOA Planning Regions:

Region A: WDA 1, 2, 3

Region B: WDA 4, 5

The regional planning analysis was presented to local board directors in March 2018 and presented to the CWI in April 2018 where they voted to recommend approval of the above-mentioned regions. Maher and Maher provided technical assistance to assist state staff in the development of regional planning guidance and to help board members, staff, and partners fully understand the benefits and framework of regional planning. A meeting was held in May of 2019 to bring each local workforce area together in regional configurations to work through some of the major challenges and concerns related to regional planning.

A unit of general local government or grant recipient that requests but is not granted designation of an area as a local area under either the initial or subsequent designation clause may submit an appeal to CWI. If a decision by CWI is not rendered in a timely manner (60 days after the submission of the appeal), or if the appeal does not result in designation, the entity may request review by the Secretary of Labor. Appeals must be filed no later than 30 days after receipt of written notification of the denial from the State Board and must be submitted by certified mail, return receipt requested, to the Secretary of Labor.

The appellant must establish that it was not accorded procedural rights under the appeal process set forth in the State Plan, or establish that it meets the requirements for designation in WIOA sections 106(b)(2) or 106(b)(3) and 20 CFR 679.250. The Secretary of Labor may require that the area be designated as a WDA, if the Secretary determines that the entity was not accorded procedural rights under the State appeals process or if the area meets the initial designation requirements at WIOA section 106(b)(2).

One-stop partners may submit a written appeal to the CWI Chair and Executive Director within 15 calendar days of receiving a written determination notification. Appeals submitted after this time will not be considered.

The appealing entity must explain why it believes the determination is contrary to the provisions of WIOA 102(b)(2)(D)(i)(IV). No other cause for appeal will be considered. The CWI Chair will convene a special meeting of a designated committee to review and respond to the appeal in writing within 30 calendar days of its receipt.

If the petitioning entity is denied, further appeal to the Secretary of Labor may occur if the entity alleges that the area meets the requirements of WIOA 102(b)(2) or that the entity was not accorded procedural rights under the state appeal process described herein. All such appeals to the Secretary must be submitted within (15) calendar days of receipt of the notification of denial by CWI on behalf of the Governor. The appealing entity must simultaneously notify the Governor and CWI of such an appeal to the Secretary of Labor. The Secretary of Labor will make a final decision within thirty (30) calendar days after the appeal is received. The Secretary of Labor will notify the Governor and the appellant in writing of the Secretary's decision.

Pending the Secretary of Labor's decision, the original determination of infrastructure costs will be implemented.

## 2. STATEWIDE ACTIVITIES

Governor's Set Aside Funding: Wisconsin expects to utilize the 15% of the Title I set aside funds for the administrative purposes allowed under WIOA Sections 128 and 133, and the remaining portion of the set aside for both the required statewide activities, as well as the allowed statewide activities that support the strategic goals set forth in this four-year Combined Plan. The state will designate specific initiatives for priority spending based on regional sector strategy priorities and partnership initiatives with local and state agencies. Wisconsin will also look to invest resources in initiatives which may include the following:

- Work Based learning initiatives with a focus on achieving wage increases for workers.
- Apprenticeship strategies for both youth and registered programs to enhance current state efforts including expanding the bridging between the two programs.
- Coordinated business services.
- Expanded partnerships with the Wisconsin Department of Corrections to increase job center efforts inside of prisons, support instructional needs for inmates and to seek innovative ways to provide training to incarcerated clients.
- Identifying and responding to skill gap issues to address workforce development needs.
- Services to special populations and groups, including homeless populations, foster care clientele, opioid addicted clientele and targeted barriered military veterans and their spouses. This may include pilot programming.
- The expansion of mobile job centers. Wisconsin purchased a mobile job center that was deployed in Fall 2019. Based on demand, Wisconsin will explore whether additional units may be needed.
- DWD wants to enhance overall data sharing between divisions within the Department as well as external partners that are part of the WIOA State Plan. This may include creation of a Statewide Data Governance team to better manage data at the state level.

Rapid Response Funds: The State Rapid Response Team has formed collaborative partnerships to identify and design appropriate interventions. Rapid Response early interventions may include a variety of services tailored to the needs of the company and its employees and may include workshops, onsite registrations, orientations and intakes for WIOA and TAA, and hiring events at which dislocated workers are connected with companies hiring for similar positions.

Early intervention and comprehensive pre-layoff assistance are the foundation of the state's layoff aversion strategy which focuses on training, supporting, and empowering the local Rapid Response team to:

- Identify and connect with employers at-risk of permanent worker layoffs as much in advance of layoffs as possible upon the state receiving official notice of a permanent layoff (either in compliance with the Worker Adjustment Retaining Notification Act and/or the State's Business Closing and Mass Layoff Law), the state immediately creates or updates a record in its new web-based Rapid Response Events Tracking system and sends an alert to the appropriate local Rapid Response team(s);

- 
    - The state will explore options to more efficiently and effectively monitor media sources for news about layoffs and/or indicators that a company is at-risk of layoffs so the information can be shared with the local Rapid Response teams;
    - The state will continue to work with the local Rapid Response teams to strengthen communication and collaboration with the WEDC and the extended enterprise of local economic development organizations;
    - The state will incorporate information about Rapid Response and layoff aversion assistance in the labor law clinics that it offers to the public (focus of clinics is typically employer-related issues and audience is usually employer representatives); and
    - The local WDBs may use their Annual Allotment funding to further develop processes for identifying and gathering information of potential layoffs.
- Undertake a comprehensive assessment of the employer and worker needs
    - The state will continue to have the local Rapid Response teams use a guide for gathering information from at-risk employers in order to ensure collection of critical information necessary for preparing a tailored transition plan and identifying other related at-risk employers; and
    - The state will continue to require that the local Rapid Response teams distribute worker surveys for events impacting at least 25 workers.
- Promote the ongoing engagement with employers and the greater business community, either directly or through business services representatives within the public workforce system. The WDBs may use their Annual Allotment funding as part of efforts to establish and strengthen relationships with the business community.
- Prevent or minimize the duration of unemployment resulting from layoffs by promoting proactive and comprehensive pre-layoff assistance to workers.
    - The local Rapid Response teams are required to extend a minimum level of Rapid Response services depending on the size of the dislocation event (see table, below);
    - The state provides the local WDBs with Annual Allotments in order to fund Rapid Response staff and activities. The state also provides funds to the local Job Service staff to assist with rapid response activities. The local WDBs may also request funding through the state's dislocation grant process if additional resources are needed to provide Rapid Response services to affected workers from specific layoff events; and

- The state supports each local WDA with a mobile computers for use with Rapid Response activities, including résumé, job search, and UI application workshops.

See Section a.2.A.

The Wisconsin Department of Military Affairs, Division of Emergency Management (DEM) leads disaster response activities throughout the state, working closely with Federal Emergency Management Agency (FEMA) when appropriate. The DEM established the Wisconsin Recovery Task Force (WRTF) in 2008, bringing together a variety of state and non-government agencies/organizations to ensure expedited and long-term recovery for communities affected by disasters. WRTF consists of six support committees – Economic, Health & Social Services, Housing, Infrastructure, Agriculture, and Mitigation. DWD-DET's Bureau of Workforce Training (BWT), Program Administration Section is a member of the Health & Social Services support committee, providing expertise and guidance for addressing job loss resulting from natural disasters. DEM periodically convenes WRTF to address response strategies and to ensure appropriate partners are included in planning efforts. WRTF has also published a formal emergency response plan for the state.

If a disaster results in significant job loss, BWT's Program Administration Section will collaborate with the WRTF network of partners and the affected WDB(s) to ensure effective use of resources and implementation of strategies. DWD-DET will ensure that local Rapid Response teams provide services to help mitigate unemployment resulting from the disaster. The WDBs and DWD's Job Service are charged with collaboratively carrying out Rapid Response activities within their respective areas. In cases of natural disasters, DWD-DET will strongly encourage the impacted WDB(s) to set up one or more transition centers if a Job Center is not within proximity of the affected area, or if additional capacity is needed to adequately serve newly dislocated workers. The WDB(s) may request Dislocation Grant funding from the state's Rapid Response reserve to cover the costs of staff, materials, and other expenses related to the provision of Rapid Response activities, including transition centers.

BWT's Program Administration Section will assist the local WDB(s) to leverage resources to disseminate information about services to those affected by the disaster. DWD-DET will also consult with the local area(s) to determine whether to pursue a regular or disaster National DW Grant (NDWG). If a disaster NDWG is pursued, DWD-DET will seek guidance and technical assistance from the DOL Regional Office and other states that have more experience implementing these types of grants.

In Wisconsin, the Rapid Response Program operates in essentially the same manner regardless of whether a TAA petition or certification is involved. Sub-section B under "Statewide Activities" describes the DWD-DET's Rapid Response Program and the grants system funded by Wisconsin's Rapid Response reserve.

DWD-DET extends Rapid Response services to all worker groups covered by a TAA petition, just as it provides Rapid Response services to any worker group that has been or will be permanently laid off. In most cases, DWD-DET and its local Rapid Response team are already aware of a given dislocation event and whether Rapid Response activities are underway before a TAA petition is filed. If a TAA petition is the first notice of a dislocation event, DWD-DET will notify the local Rapid Response team, who will contact the employer and any associated union(s) to plan worker transition services. The minimum level of services offered must conform to established requirements described in the "Statewide Activities" section.

When Rapid Response teams serve potentially TAA-eligible worker groups, they share basic TAA Program information, including information about the program enrollment process that workers follow if certification occurs. If the Rapid Response team does not have access to the worker group prior to layoff, DWD-DET will use UI claimant information to identify potentially affected workers. In this situation, the local Rapid Response team will reach out to the laid off workers using contact information obtained from UI. This is no different from DWD-DET's standard Rapid Response protocol.

A local WDB may request Rapid Response funding in the form of a Dislocation Grant and/or an Additional Assistance Grant to serve potential TAA-eligible worker groups in the same manner it requests funds for all other worker groups. The only difference is that Additional Assistance funding cannot be used to fund training for individual participants once a worker group is covered by a TAA certification.

If a TAA petition is certified, DWD-DET's TAA Program is responsible for identifying individuals potentially eligible under the certification through worker lists supplied by the employer and/or UI claimant information. The TAA Program then uses a standard mailer to contact the potentially eligible individuals, inviting them to attend a TAA orientation session to learn about program benefits and register. If the certified group is under 25 workers, a packet of information may be sent out in lieu of in-person sessions.

At the orientation sessions, TAA Program staff use a standardized presentation to explain the program benefits, the process for accessing the benefits, and critical deadlines. During the presentation, TAA staff provide individuals with written materials that cover the TAA Program benefits. Representatives from the WIOA Dislocated Worker Program, Veteran Services, Technical College System and other partner programs are typically present at the orientation session to provide basic information about their respective programs and how individuals can enroll, and to explain the advantages of dual enrollment.

DWD-DET is committed to continually exploring ways to make TAA Program information more user-friendly and to improve coordination between the TAA and WIOA programs. In the past year, the TAA Program developed a series of short online videos that describe the program's purpose, program benefits and critical information related to accessing the benefits. These videos use infographics and testimonials to help engage viewers, explain complex information, and encourage benefit utilization. The videos are shown during TAA orientation sessions and are also available online.

## B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

### 1. WORK-BASED TRAINING MODELS

DWD-DET's two priorities are to focus efforts and resources on (1) improving On-the-Job Training (OJT) outcomes and (2) bridging the Adult Program and Dislocated Worker Program with Registered Apprenticeship.

**Improving OJT Outcomes**

DWD-DET plans to take several steps to ensure that OJTs are resulting in successful, high quality experiences for both participants and employers, including:

• developing ways to improve outreach to program participants and employers about OJT opportunities; including leveraging various partners' relationships with employers (e.g., state and local economic development, Job Service, Veterans Services, etc.);

• standardizing and streamlining forms, including contracts and training plan templates;

• ensuring participants are job ready prior to the OJT opportunities; and

• ensuring effective training plans are developed and adequately monitored.

**Bridging the Adult Program and Dislocated Worker Program with Registered Apprenticeship**

This is addressed directly below.

2. REGISTERED APPRENTICESHIP

Registered Apprenticeships (RAs) are job-driven opportunities that will be more effectively integrated within the Adult and Dislocated Worker Programs. The BWT Program Administration Section is responsible for the state-level oversight of the Title I-B programs. The Bureau of Apprenticeship Standards is co-located within the same division as BWT. Appropriate representatives from both areas will come together to:

- Plan and implement trainings for WIOA Adult Program, Dislocated Worker Program and TAA Program career planners within the One-stop Centers so career planners are able to share basic information about the RA program, including apprenticeable occupations, apprenticeship sponsors in the area, and the application process.
- Plan and implement trainings for business services staff so they can help promote the development of new RA programs to employers and refer interested employers to their local Apprenticeship Training Representative.
- Ensure that One-stop Centers maintain updated sponsor lists and outreach materials and make these materials available to WIOA and TAA career planners as well as business services staff.
- Provide guidance to the WDBs and their service providers as well as TAA career planners on ways that participants' Individual Employment Plans can incorporate preparation for RA programs, including use of occupational classroom, OJT, and supportive services. Guidance will address how WIOA funds may be used to cover pre-apprenticeship readiness programs that help participants compete for RAs. Guidance will also address how WIOA funds can cover RA programs.
- Promote communication and collaboration between career planners, business services staff, and the local Apprenticeship Training Representatives.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

DWD's goals for its ETPL are threefold: (1) to build a robust list of high-quality training options for its Title I Adult, Dislocated Worker and out-of-school Youth participants across the state, including promoting ETPL participation to sponsors of registered apprenticeship programs, (2) to ensure the online ETPL application process is user-friendly for training institutions interested in joining the list, and (3) to explore ways the ETPL may benefit other public workforce development programs that offer training services to their participants.

To access all of Wisconsin's ETPL-related policies and procedures, see Chapter 7 of DWD's online WIOA Title I-A & I-B Procedure Manual. **The information contained in this Plan does not address all of the details outlined in those policies and procedures.**

After consulting with the Governor's Council on Workforce Investment and the directors from the local WDBs, DWD, as Wisconsin's State Workforce Agency, carefully crafted the state's ETPL eligibility policies and procedures. The parties agreed that, as part of these policies and procedures:

- information requirements and criteria for initial and continued eligibility will be the same and will align with federal ETP performance reporting requirements;
- some information requirements and eligibility criteria will depend on the institution's status as a "Standard" or "Alternate" institution;
- ETPL eligibility criteria will not include minimum levels of program performance;
- the local WDBs will refrain from requiring additional information requirements and eligibility criteria;
- DWD-DET will be responsible for receiving and reviewing institution and program applications and making initial and continued eligibility determinations; and
- continued eligibility will occur annually, at the same time each year.

**Initial Eligibility Criteria**

The following are initial eligibility requirements that an institution must meet for **each program**:

(1) The institution meets the Institution Minimum Requirements:

- it is a provider of training services;
- it has a current, verifiable Federal Employer Identification Number (FEIN);
- ;
- it is not a "delinquent taxpayer" with the Wisconsin Department of Revenue;
- it has an Officer that DWD can identify through sources other than the Institution Application;

AND

- the Officer agrees to and electronically signs the Wisconsin

Note: For purposes of the ETPL, "Officer" is defined as the training institution's owner, president, vice president, other executive-level representative of the institution, board director or provost.

(2) The institution meets the criteria to be classified as a "Standard" institution:

- it is accredited by an accrediting organization approved by the Council for Higher Education Accrediting (CHEA);
- it is a member of the National Council for State Authorization Reciprocity Agreement (NC-SARA);

OR

- it is approved by Wisconsin's Educational Approval Program (EAP).

Or, if the institution is not "Standard," the program meets at least one of the following alternate eligibility criteria:

- it is accredited by one of the accrediting organizations approved by CHEA;
- it relates to barbering, cosmetology, real estate, substance abuse counseling, aesthetics, electrology, manicuring, medication aide, certified nursing assistant, or lead and/or asbestos removal training and is approved by the Wisconsin Department of Health Services (DHS) or Department of Safety and Professional Services;
- it relates to Community Based Residential Facilities and the instructor(s) is (are) approved by the Wisconsin DHS through UW-Green Bay;
- it is a pre-apprenticeship certified by the Wisconsin Apprenticeship Advisory Council;
- it is currently listed on another state's ETPL;
- it is supported by a trade association, with a letter of support from that trade association;

OR

- it is supported by three employers, with a letter of support from each.

Letters of support must: (1) identify the name and address of the trade association or employer, (2) include a statement from the trade association or employer supporting the training program, (3) clearly identify the name of the training program, (4) identify the position title of the individual signing the letter, and (5) contain a date that includes the year. Employer letters of support from local WDBs or their service providers are not permitted. Letters of support do not need to be updated annually; however, the letters are made available on the published ETPL website and must reflect the date of the letter.

(3) The institution complies with all institution-level information requirements.

(4) The institution complies with all program-level information requirements, which includes submitting individual-level information for all students enrolled in the training program for the three most recently completed program years. However, institutions that are part of Wisconsin's Technical College System (WTCS) are not required to submit the individual-level student information if the program is recognized by the WTCS Office. In those instances, the WTCS Office submits the required student information to DWD directly. A program is considered recognized by the WTCS Office if it has been assigned a unique identification number by the WTCS Office.

The information requirements addressed in (3) and (4) align with federal performance reporting requirements outlined in ETA-9171. Furthermore, DWD requires and requests some additional information (not related to performance) that the local WDBs consider helpful when participants and career planners evaluate training programs. The complete list of information requirements are outlined in Chapter 7 of DWD's online WIOA Title I-A & I-B Procedure Manual. Training institutions may contact DETETPL@dwd.wisconsin.gov for technical assistance.

Note that as part of the information requirements, an institution must supply O*NET-SOC and CIP Codes to denote the occupation(s) the program of study prepares students for. This information is then displayed on the Wisconsin's published ETPL. In turn, participants and

career planners use the ETPL to identify programs of study that support the local workforce area's in-demand occupations and industries. For more information about requirements related to funding programs included on the ETPL (i.e., individual training accounts), see Chapter 7 of DWD's online WIOA Title I-A & I-B Procedure Manual. Since the ETPL is statewide and local areas have different in-demand and occupations and industries, DWD only requires institutions to submit O*NET-SOC and CIP Code information for each program; it does not limit program eligibility based on the information submitted.

Under WIOA, registered apprenticeship programs are automatically eligible to be included on the state's ETPL because of the extensive vetting process they undergo to become registered. The only limitation to automatic eligibility is if DWD discovers that the registered apprenticeship sponsor or, if applicable, the provider(s) of the classroom component is suspended or debarred from participating in federal programs or activities.

**Initial Eligibility Procedure**

DWD-DET's initial eligibility procedure requires a representative with the institution to first complete and submit an Institution Application through the ETPL Provider Portal. DWD then reviews the application to determine if the institution has submitted all institutional-level information requirements and meets all Institution Minimum Requirements.

If these requirements are met, DWD next determines whether the institution is a "Standard" institution. A Standard institution may add training programs to the published ETPL through the Provider Portal, if it supplies all required program-level information for each program. Institutions that are not classified as "Standard" are classified as "Alternate" institutions. Alternate institutions must supply all required program-level information through the Provider Portal and the program must meet at least **one** of the alternate eligibility criteria before DWD will add the program to the published ETPL.

New institutions may apply to have their programs added to Wisconsin's ETPL at any time through the ETPL Provider Portal.

DETETPL@dwd.wisconsin.gov or submit an Institution Application through the ETPL Provider Portal. More information about Wisconsin's ETPL procedure for registered apprenticeships is available in Chapter 7 of DWD's online WIOA Title I-A & I-B Procedure Manual.

**Continued Eligibility Criteria**

The following are the continued eligibility requirements that an institution must meet for **each program**:

(1) The institution still meets the Institution Minimum Requirements described above.

(2) The institution still meets the criteria to be classified as a "Standard" institution or, if the institution is classified as an "Alternate" institution, the program continues to meet at least one of the alternate eligibility criteria.

AND

Institutions must submit this file regardless of when the program eligibility began. Institutions that are part of the WTCS; however, do not submit the file. The WTCS Office submits the required student information to DWD directly for programs that is has assigned a unique identification number.

As addressed earlier in this section, Wisconsin chooses not to establish minimum performance standards as part of its continued eligibility criteria; this is permissible under 20 CFR § 680.460(f)(1)(iv). Wisconsin takes performance indicators and outcomes into account as part of initial eligibility. During initial eligibility, institutions are required to provide individual-level student information for each program. This allows DWD to publish verifiable program performance outcomes (including employment and earnings information) on the ETPL. Participants are then able to select programs based on performance outcomes as outlined in 20 CFR § 680.460(f)(1)(i) and (iii). This approach to handling performance outcomes is consistent with WIOA's intent – to provide Title I program participants with the information they need for informed decision-making and promote consumer choice in the process of selecting a program of training.

While Wisconsin's continued eligibility criteria does not directly address the items specified in 20 CFR §§ 680.460(f)(2)-(9), these factors were appropriately and carefully considered when formulating the state's eligibility criteria, which includes the information requirements that institutions must satisfy in order to have programs published on the ETPL. Wisconsin, however, realizes there is some confusion about the intent of 20 CFR §§ 680.460(f)(2)-(9) because TEGL 8-19, Attachment III treats these items as eligibility criteria for each provider and/or program on the ETPL. However, consistent with 20 CFR § 680.460(f), Wisconsin, "in establishing [its] eligibility criteria… [took] into account" those factors identified in (f)(2)-(9). For instance, DWD's published ETPL displays comprehensive information about the programs, and that information addresses the factors outlined in 20 CFR §§ 680.460(f)(2)-(9), such as:

- whether the program is offered in-person and/or online and any physical locations where the program is offered (680.460(f)(2));
- whether the program is approved/regulated by another state agency (680.460(f)(3) and (5));
- the occupation(s) the program of study prepares students for, according to O*NET-SOC and CIP Codes (680.460(f)(4));
- the program outcome, including whether it leads to a recognized post-secondary credential, such as an industry-recognized certificate (680.460(f)(6) and (7));
- the quality of the training program based on criteria such as accreditation, EAP approval, or any one of the alternate eligibility criteria (680.460(f)(8));
- the accessibility of the program in terms of times of day the program is offered and contacts if accommodations are needed (680.460(f)(9)).

**Continued Eligibility Procedure**

DWD performs its continued eligibility procedure annually. Wisconsin's continued eligibility procedure consists of the following steps:

(1) DWD notifies all institutions with programs on the published ETPL when the continued eligibility period is approaching (starts July 1) and reminds them to submit the student file for the most recently completed program year no later than August 31.

(2) DWD verifies that the institution meets the continued eligibility criteria.

(3) DWD removes programs from the published ETPL if they fail to meet the continued eligibility criteria. Institutions and their programs that pass continued eligibility requirements maintain their listing on Wisconsin's published ETPL.

## 4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDED BY THE ADULT FORMULA PROGRAM

To access the full policy related to priority of service generally and how it applies to the Title I Adult Program, see Chapter 8 of DWD's online WIOA Title I-A & I-B Procedure Manual.

"Priority of service" means the right to take precedence over a person with lower priority in obtaining employment and training services. The person with priority receives access to a service earlier in time than a person with lower priority or, if the resource is limited, receives access to the service instead of the person with lower priority. Priority is not part of the eligibility determination; rather, it is meant to emphasize access to individualized career and training services for these higher-need populations.

Priority of service must be assessed at the time of eligibility determination, and participants must be informed if they are to receive priority. If, during participation, the career planner learns of changes in an individual's status that allow him or her to receive a higher priority of service, the individual must be given increased priority. For example, if someone who was not low-income at program entry becomes low-income during participation, the individual starts receiving increased priority as soon as the career planner becomes aware of the change.

Once a priority level has been assigned participants cannot move to a lower priority level during an episode (there is one exception for eligible spouses of veterans). Priority levels must be reassessed at the beginning of each new program episode.

Veterans and eligible spouses receive priority of service in **all** WIOA Title I programs. For the **Adult Program only**, priority for individualized career and training services must also be given to participants who are designated:

- low-income (this includes public assistance recipients), and/or
- basic skills deficient (this includes English Language Learners) for the Adult Program.

Priority of service for the Adult Program must follow this order:

- First: Veterans and eligible spouses who are low-income or basic skills deficient.
- Second: Individuals who are who are low-income or basic skills deficient but are not veterans or eligible spouses.
- Third: Veterans and eligible spouses who are not low-income or basic skills deficient.
- Fourth: Anyone who does not belong to one of the groups above, but who belongs to a priority population established by the State or the local WDB.
- Last: Everyone else.

The State declines to add additional priority populations. Additional priority populations established by a local WDB must be identified in its Local Plan. It is up to the local WDB whether a newly designated priority population applies to all active participants or only to participants who enter the program after the new policy becomes effective.

For more information about who qualifies as a veteran or eligible spouse for purposes of implementing priority of service, see Chapter 8 of DWD's online WIOA Title I-A & I-B Procedure Manual

If the local WDB has a waiting list for any individualized career or training services, participants must be placed on the list consistent with the order outlined above.

Career planners should follow these steps when serving individuals in the Adult Program:

1. Determine whether the individual seeking to enroll is a veteran or eligible spouse.
1. Determine whether the individual is low-income.
1. If the individual is not low-income, she or he must complete the Basic Skills Screening Tool, which screens for basic skills deficiencies. If the individual answers "No" to any of the questions on the screening tool or is unable to complete the form without assistance, she or he is considered basic skills deficient.

Assign order of priority (first, second, third, etc.) as described at the top of this section and document it in the ASSET case notes.

During monitoring, the adult participants file is reviewed and evaluated on the priority of service level. The monitoring team also determines whether the priority level was appropriately established and documented.

## 5. DESCRIBE THE STATE'S CRITERIA REGARDING LOCAL AREA TRANSFER OF FUNDS BETWEEN THE ADULT AND DISLOCATED WORKER PROGRAMS

Section 133(b)(4) of WIOA and Section 20 CFR 683.130 allow the local WDBs to transfer up to 100 percent of formula funds of a program year (PY) allocation between the Adult Program and Dislocated Worker Program. DWD-DET is extending the full transfer authority afforded by WIOA to the local WDBs, in order to ensure the local WDBs have maximum flexibility to best serve participant populations with the greatest needs.

On behalf of the Governor, DWD-DET will serve as the approving authority for the WDBs' funding transfer requests. To be eligible for a transfer, DWD-DET will take the following factors under consideration:

- Expenditures and obligations for the Adult Program and Dislocated Worker Program PY formula funds at issue;
- The quarter of the grant period in which the request is made;
- Availability of funds for both formula programs, including carry-in funding from the prior program year;
- Availability of Rapid Response and National Dislocated Worker grant funding;
- Total enrollments in both formula programs;
- Total training enrollments in both formula programs;
- Applicability of TAA certifications in the local area;
- Impact on the WIOA primary indicators of performance; and

- Implications for Rapid Response and National Dislocated Worker grant funding.

DWD-DET will approve transfer requests unless it anticipates that a transfer will negatively impact the local WDB's ability to adequately serve current or future program participants and/or meet the local area's adjusted levels of performance.

Local WDBs must submit transfer requests to their assigned Local Program Liaison. They must make requests in writing and include the following: (1) a statement indicating the program and the PY in need of additional funding; (2) the amount of additional funding requested for the program in need; (3) a budget reflecting actual and planned participant enrollments and expenditures/obligations for the applicable PY formula funds; and (4) a narrative addressing how the WDB will meet adjusted levels of performance for the primary indicators if the transfer request is approved.

DWD-DET will review the request and issue a determination within 30 days.

C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS OR CONTRACTS.[11]

**Wisconsin's Vision for Serving Youth through Title I-B**

The state's at-risk youth will acquire the knowledge, skills, and abilities to obtain a high school diploma or its equivalency, enter the world of work, and/or attend postsecondary education towards their path to economic self-sufficiency.

**Mission Statement**

DET-DWD will promote an integrated youth service-delivery system, which will include career exploration and guidance, education and training, work experience, and job readiness services. The state's Youth Program will provide youth participants with the support needed to help them achieve educational and/or workplace success in demand industries and occupations.

**Grants and Contract Process**

Local WDBs must award grants in competitive and non-competitive processes in accordance with the Uniform Guidance.

**State-developed Criteria for Local WDB Grant Awards**

When evaluating whether to award a grant or contract to a provider of youth workforce investment activities, local WDBs should consider the following:

- whether the activities are readily available in the local community and are free of charge;

- the provider's effectiveness in serving the populations the program targets, as demonstrated by its past ability to meet the performance standards for WIOA's six primary indicators;
- if the provider is new to WIOA service provision, its effectiveness in serving the populations toe program targets, as demonstrated by relevant and verifiable performance measures related to education and training participation, unsubsidized employment, credential attainment, skill gains, and/or earnings for those served;
- the provider's financial stability, as demonstrated by its recent financial statements or other relevant information;
- the provider's financial accountability, as demonstrated by its fiscal policies and procedures, annual reports or other relevant information;
- the qualifications and expertise of the provider's staff, as demonstrated by education and training, credentials, and relevant experience; and
- the providers linkages with other youth service providers, schools and employers, as demonstrated by such things as letters of support, references, or annual reports.

Local WDBs are also strongly encouraged to give preference to provider proposals which:

- offer a comprehensive set of services relating to one or more of the 14 program elements;
- offer academic enrichment activities that provide secondary school credit and have strong connections back to school;
- offer meaningful work-based learning opportunities;
- demonstrate linkages to the One-stop System;
- demonstrate the knowledge and ability to effectively serve youth with disabilities;
- demonstrate experience in preparing youth for non-traditional occupations;
- demonstrate the ability to continuously improve service delivery and provide data to conduct program evaluation;
- include effective and/or innovative strategies to engage out-of-school youth;
- include strong linkages between occupational and academic learning;
- include established and effective connections with employers and providers of community resources.

Local WDBs are to craft their procedures in a manner that requires potential providers to submit all appropriate and necessary information for evaluation, prior to an award being made. Local WDBs are encouraged to add other considerations as it deems appropriate and to engage its standing youth committee in this process if such a committee exists.

## 2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER

PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

Wisconsin has the following three primary strategies to help support improved outcomes of OSY participants:

**Leveraging and Aligning Resources.** As discussed throughout this plan, there are many efforts currently underway that involve increasing cross-program alignment, collaboration, and coordination of core and partner programs – from common intake to more effective cross-program referrals, training, and co-enrollment. Wisconsin is also implementing a WIOA 101 training across all plan partners. This training will educate partners on all programs contained within the WIOA State Plan. Training partners on other programs will grow partner knowledge with the intent of increasing co-enrollment. Progress with respect to these efforts is anticipated to result in improved outcomes for out-of-school youth (OSY) participants, especially those who are in need of Title II adult basic education and/or Title IV vocational rehabilitation activities.

**Emphasizing Earn as You Learn.** Registered apprenticeships may be an appropriate fit for OSY participants who have struggled with traditional classroom-only learning and/or who would benefit from a reliable income while completing training. DWD's Division of Employment and Training is responsible for the oversight of both the WIOA Title I Youth Program and the state's registered apprenticeship system. The Division will assess how to more effectively bridge these programs, including cross-program training of frontline staff and developing and implementing innovative approaches to help connect OSY and apprenticeship sponsors.

**Integration of Technology in the Service Delivery Model.** As discussed in another section of this plan, DWD has made significant strides in modernizing the way participants engage and interact with the public workforce development system. The result of the modernization efforts has been the implementation of a case management application (referred to as "CEPT") that interfaces with several online tools that participants may access through the My JCW portal on jobcenterofwisconsin.com. The modernization efforts are not intended to replace face-to-face interactions between participants and their career planners; rather, it enhances the service-delivery process by allowing participants and career planners to more effectively exchange information and engage virtually. The online tools that DWD has already developed include a Budget Planner, Self-sufficiency Calculator, Community Resources locator, Action Steps tool, Career Exploration tool, and Individual Employment Plan (IEP)/Individual Service Strategy (ISS) development tool. As these tools become more widely used by frontline staff, we anticipate increased engagement from OSY participants because so many young adults feel more comfortable interacting with others via technology. DWD will continue to lead efforts to further enhance the CEPT application and the existing online tools, as well as develop new tools to improve the way customers, including OSY participants, engage with the public workforce development system.

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED, INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT. [12]

DWD-DET currently performs annual desk monitoring of service delivery data, within its electronic case management system, to assess the degree to which each local WDB provides the

14 program elements to Youth Program participants. The purpose of this desk monitoring is to gain an understanding of how frequently each element is provided and to analyze if certain elements appear to be underused.

During 2020 and 2021, DWD-DET will add two new procedures to its annual monitoring process to ensure that all 14 program elements are made available and effectively implemented:

1. DWD-DET will require each local WDB to provide information about how it delivers all 14 program elements. For each element, the local WDB must indicate the option(s) it will exercise to provide the element (i.e., partnership, grant/contract, or direct provision. If the local WDB uses a partner or grant/contract to provide an element, the local WDB must provide the name of the entity providing the element along with documentation that demonstrates the relationship between the local WDB and the entity.

1. Each year, DWD-DET will select individual program element(s) for more intensive monitoring. DWD-DET will review a random sample of files for youth who received a service aligned with the selected program element(s) to assess whether the element(s) were provided in a manner that was appropriate, effective, and aligned with the participants' Individual Service Strategies.

4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR "REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(B)(III)(VIII) AND FOR "REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII). IF THE STATE DOES NOT HAVE A POLICY, DESCRIBE HOW THE STATE WILL ENSURE THAT LOCAL AREAS WILL HAVE A POLICY FOR THESE CRITERIA.

The state's policy as outlined in DWD-DET's WIOA Titles I-A and I-B Policy and Procedure Manual and is as follows:

This eligibility barrier applies if individuals require additional assistance to:

- complete an educational program;

OR

- secure or hold employment.

Local WDBs are not required to use this criterion as part of eligibility determinations. However, as Wisconsin's Governor's Council on Workforce Investment has declined to further define this category, local WDBs must include policy and procedure for applying this criterion in their local plans if they choose to use it as an eligibility criterion. Any policies and procedures should be reasonable, quantifiable, and based on evidence that the specific characteristic of the youth identified in the policy objectively requires additional assistance.

**Note:** Even if a local area chooses to use this category as part of ISY eligibility, no more than 5 percent of newly enrolled ISY participants in the local area can be found eligible based on the "needs additional assistance" category in any given program year. There is no similar restriction for OSY eligibility. DWD-DET holds the local WDBs responsible for tracking eligibility determinations for ISY that are based **solely** on this eligibility barrier and ensuring compliance with the 5 percent limitation. Any costs associated with serving participants who exceed the 5

percent limitation will be disallowed. In cases where the local WDB exceeds the 5 percent limitation, participants' eligibility determination dates will be placed in chronological order and only the first 5 percent will be covered by the limitation.

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE "NOT ATTENDING SCHOOL" OR "ATTENDING SCHOOL," INDICATE THAT IS THE CASE AND PROVIDE THE STATE POLICY FOR DETERMINING WHETHER A YOUTH IS ATTENDING OR NOT ATTENDING SCHOOL.

As Wisconsin state law does not define "attending" versus "not attending" school, DWD-DET has published the following policy in its online Title I-A and I-B Policy & Procedure Manual:

DWD-DET considers an individual to be "attending" school at the time of eligibility determination if s/he is:

- reporting to school on a routine basis, either physically or virtually, when school is in session;
- in between school sessions and is enrolled to continue school at the start of the next session (e.g., the summer between secondary school grade levels);

OR

- registered for postsecondary school but classes have not yet started.

**Note:** Registration or attendance in postsecondary school must always involve credit-bearing classes. If the classes are non-credit-bearing, the individual is not considered to be "attending" school.

DWD-DET considers an individual as "not attending" school at the time of eligibility determination if s/he does not meet the "attending" definition and meets **one** of the following:

- has not reported to school, either physically or virtually, for at least four full weeks and is not subject to the state's compulsory school attendance law (e.g., the individual is 20 years old and has not attended postsecondary training for the last four weeks);
- is between school sessions and decides not to follow through with attending and is not subject to the state's compulsory school attendance law;
- is not currently reporting to school but is registered for postsecondary school and decides not to follow through with attending;
- is enrolled in non-credit-bearing postsecondary classes;

**OR**

- is subject to the state's compulsory school attendance law but has not reported to school, either physically or virtually, for the most recently completed quarter of the school district's school year or longer.

**Note:** Wisconsin's compulsory school attendance law requires individuals between the ages of 6 and 18 to attend school when in session, unless they have already graduated from secondary school or are excused from attending (excuses are defined by the law). Under the law, individuals who turn 18 years of age during the school year must continue to routinely report to school until the end of the term (quarter or semester) in which they turned 18.

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL'S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

The state has declined to establish a policy for WIOA section 3(5)(B). Consistent with 20 CFR 681.290(b), DWD-DET allows local WDBs the option to use the basic skills definition contained in WIOA section 3(5)(B) if it has established policy within its Local Plan. DWD-DET's full policy is contained in its WIOA Titles I-A and I-B Policy & Procedure Manual.

D. SINGLE-AREA STATE REQUIREMENTS

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

**Wisconsin is not a single-area state, this section does not apply.**

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

**Wisconsin is not a single-area state, this section does not apply.**

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

**Wisconsin is not a single-area state, this section does not apply.**

6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.

**Wisconsin is not a single-area state, this section does not apply.**

7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.

**Wisconsin is not a single-area state, this section does not apply.**

8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

**Wisconsin is not a single-area state, this section does not apply.**

E. WAIVER REQUESTS (OPTIONAL)

Wisconsin is not submitting a waiver request; these sections do not apply.

TITLE I-B ASSURANCES

| The State Plan must include | Include |
|---|---|
| 1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; | Yes |
| 2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; | Yes |
| 3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members; | Yes |
| 4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2); | Yes |
| 5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership; | Yes |
| 6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions; | Yes |
| 7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7); | Yes |
| 8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan; | Yes |
| 9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; | Yes |
| 10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. | Yes |
| 11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); | Yes |

ADULT PROGRAM PERFORMANCE INDICATORS

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Employment (Second Quarter After Exit) | 76.0% | 76.0% | 76.0% | 76.0% |
| Employment (Fourth Quarter After Exit) | 71.0% | 75.0% | 71.0% | 75.0% |
| Median Earnings (Second Quarter After Exit) | $5,500 | $5,800 | $5,500 | $5,800 |
| Credential Attainment Rate | 60.0% | 65.0% | 60.0% | 65.0% |
| Measurable Skill Gains | 35.0% | 40.0% | 35.0% | 40.0% |
| Effectiveness in Serving Employers | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] |

*1*

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

DISLOCATED PROGRAM PERFORMANCE INDICATORS

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Employment (Second Quarter After Exit) | 81.0% | 81.0% | 81.0% | 81.0% |
| Employment (Fourth Quarter After Exit) | 80.0% | 80.0% | 80.0% | 80.0% |
| Median Earnings (Second Quarter After Exit) | $7,500 | $8,000 | $7,500 | $8,000 |
| Credential Attainment Rate | 65.0% | 68.0% | 65.0% | 68.0% |
| Measurable Skill Gains | 40.0% | 45.0% | 40.0% | 45.0% |
| Effectiveness in Serving Employers | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] |

*1*

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

YOUTH PROGRAM PERFORMANCE INDICATORS

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Employment (Second Quarter After Exit) | 75.0% | 75.0% | 75.0% | 75.0% |
| Employment (Fourth Quarter After Exit) | 74.0% | 74.0% | 74.0% | 74.0% |
| Median Earnings (Second Quarter After Exit) | $3,000 | $3,500 | $3,000 | $3,500 |
| Credential Attainment Rate | 58.0% | 60.0% | 58.0% | 60.0% |
| Measurable Skill Gains | 28.0% | 32.0% | 28.0% | 32.0% |
| Effectiveness in Serving Employers | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] |

*1*

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

### A. EMPLOYMENT SERVICE STAFF

#### 1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

Wisconsin will continue to staff labor exchange services under the Wagner-Peyser Act with state merit staff employees.

#### 2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

**Professional Development includes:**

- State Coordinated Learning Center –Cornerstone – provides a wide variety of professional development opportunities for Job Service staff at no cost to the staff members, and can be accessed virtually;
- Staff participation in local, regional, and statewide seminars, conferences, and learning opportunities that focus on professional development, Business Services, successful outcomes for job seekers, best practices, and coordinated service delivery, as examples;
- Staff In-person, group specific best practices, targeted training and/or common issues, i.e., Career Counselors, staff working with Business Services and Re-Employment Services

- State-sponsored training for all new initiatives, Labor Market changes and updates, Federal and State law/compliance changes, in person trainings focusing on programmatic, policy or procedure changes in funded programs to assure program compliance, "train the trainer" to provide local experts at Job Centers throughout the state, Business Services applications and priorities; WIOA services delivery and data recording;
- Coordinated Business Services collaborative training between WDBs, Job Service, and WIOA partner staff who focus on providing excellent and responsive services to businesses throughout the state;
- Regional trainings and professional development to identify trends for both employers and job seekers, identification of changing issues, employer concerns and needs, new State-sponsored programs and services;
- Annual Performance Reviews of Job Service staff, including measurement and identification of training and professional development accessed and completed by staff; and
- Training and professional development plans for the next review period.

## 3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

Although UI and Job Service are under the umbrella of DWD, each is a distinct division, with specific staff addressing specific unemployment eligibility issues.

Professional staff in each area communicates regularly and coordinates any UI law, program or service changes. Job Service staff notifies UI of eligibility issues when they arise; adjudicators are then notified to work directly with the claimant, either over the phone, or in person when possible.

Dialogue between UI and Job Service leadership results in shared and agreed upon best practices, training and processes to assist in the parameters of eligibility issues and when it is best to work with UI.

Job Service staff receive specific training on eligibility issues, as well as step-by-step instructions and a UI "hotline" phone number for further consultation when needed.

Job Service coordinates UI-specific training for statewide Job Service and partner staff who provide services and assistance in Job Centers. The training ensures that UI programs and services have a strong presence in Job Centers throughout the state. Training is targeted to specific areas, which include Re-employment Services and Eligibility Assessments (RESEA), Rapid Response, and general UI questions and concerns regarding UI eligibility or concerns a claimant may have.

Training is conducted by UI staff and is recorded for reference and future viewing. Job Service and partner staff who complete the training are certified by UI to deliver designated information to claimants before seeking UI intervention.

The State of Wisconsin is committed to providing the best customer service and guidance to all who walk through the doors of our Job Centers. Ensuring staff is equipped with the most current UI information to assist customers is our goal and priority.

Trainings on UI-related issues and re-certification are done annually for all targeted areas. When there are changes to UI, in areas that affect claimants and/or information that needs to be provided to jobseekers, UI and Job Service partner closely together to ensure that training and information is dispensed accurately, efficiently, and timely. Conference calls, webinars and in-person trainings are used to provide the information to Job Service staff and partner staff throughout the state.

When the claimant request is outside the certified training boundaries, Job Service staff have been provided a specific phone number to call UI customer assistance. This call goes directly to UI staff, who will then provide an immediate response to the claimant.

If UI determines a case or situation must go to adjudication, the UI Call Center staff person will recommend that, and provide the necessary information and next steps directly to the claimant, who will be alongside the Job Service staff when the phone call was made. UI will determine any necessary follow-up and communication with the claimant.

## B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE

Job Service staff and WIOA funded staff listen to the claimant's concerns and will assist in the following ways:

- Assist in placing a phone call to UI for the person to explain their specific situation to UI staff.
- Assist in accessing the UI website for information and other resources available to UI claimants.
- Provide current UI basic information, approved by UI, to assist in determining claimant's next steps.
- Explain and guide the claimant through the online application as the claimant independently enters the appropriate information.

## C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

1. When an individual applies for unemployment compensation, they are required to also register on JobCenterofWisconsin.com (JCW), the state labor market exchange, within 14 days of their initial claim.
2. Claimants who are required to conduct a work search are mandated to take an online self-assessment that assists in determining barriers to re-employment and the likelihood of exhausting all available benefit weeks.
3. Based on the results of the self-assessment, claimants are assigned to one of the following:

- Path A: Work Ready – Job Service intervention not required. Claimants referred to online resources and local Job Center services, but are not required for continued UI eligibility.

- Path B: In-person Re-employment session with Job Service staff required for continued UI eligibility. Session includes a group meeting followed by a one-on-one consultation a Job Service Employment and Training Specialist or Career Counselor; work search review; referrals to workshops, partner programs and/or supportive services; job search assistance; and a required subsequent appointment to confirm completion of additional job search activities and for WP to provide any additional information, support, and potential referrals to accomplish the outcomes the job seeker has outlined.

4. Individuals registered on JCW may also receive e-mailed information about Job Fairs, hiring events, job search workshops, etc., to support their re-employment activities.

Through the statewide network of 22 Comprehensive and 30+ Affiliated Job Centers and the state labor exchange, JobCenterofWisconsin.com, all individuals have access to re-employment services, program referrals and job search assistance. Assistance is provided by Wagner-Peyser funded Job Service staff, as well as WIOA-funded partner staff.

Services include, but are not limited to:

- Access to the Internet, phone, fax and in some areas, video conferencing, for re-employment purposes;
- Career exploration, interest and technical skills assessments delivered online or in coordination with a Job Service Licensed Career Counselor;
- Computer and technical skill enhancement;
- Resume development guidance;
- Workshops to enhance interview skills, online job search and networking, resume writing, etc.;
- Workshops and programs targeted to mature workers, re-entry individuals, veterans, etc.;
- Referrals to GED assistance from technical college system partners;
- Referrals to educational opportunities and short-term training programs;
- Supportive services referrals;
- Assistance with navigating online UI application and weekly claim filing;
- Skill Explorer – the State skill matching system that links skill sets to current employment opportunities locally, regionally and statewide;
- Outreach – which can include meeting clients at itinerant locations, career and job fairs; local libraries; and
- Referrals to on-line tutorials to add to skill development; each is accompanied by a brief quiz. Depending on the quiz outcome, recommendations are made for additional workshops, resume development, etc. that are available at the local Job Center.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

Wagner-Peyser funded (Job Service) staff W-P funded staff listen to the claimant's concerns and will assist in the following ways:

- Assist in placing a phone call to UI for the person to explain their specific situation to UI staff.
- Assist in accessing the UI website for information and other resources available to UI claimants.
- Provide current UI basic information, approved by UI, to assist in determining claimant's next steps.
- Explain and guide the claimant through the online application as the claimant independently enters the appropriate information.

UI claimants are required to register on JobCenterofWisconsin.com (JCW), the state's labor exchange website. Through registering, UI claimants are informed of job search services available through Job Centers, including counseling, testing, occupational and labor market information, assessment, and referral to employers.

Wagner-Peyser staff are also trained to administer the work test for the State unemployment compensation system, which includes reviewing a claimant's work search activities and notifying UI of potential eligibility issues for further review and possible adjudication.

To receive unemployment compensation, Wisconsin requires UI claimants to be registered on JobCenterofWisconsin.com, the state labor exchange website, within 14 days of filing an initial claim. A completed registration includes building or uploading a resume to facilitate job matching within the JCW system.

Wagner-Peyser (Job Service) staff are also trained to administer the work test for the State unemployment compensation system, which includes reviewing a claimant's work search activities and notifying UI of potential eligibility issues for further review and possible adjudication.

Job Service staff cannot make the final determination of work search validity; however, Job Service staff can and do contact UI staff to assist in answering specific claimant questions.

Assisting UI claimants in finding new employment includes several initiatives. For example: Assisting claimants with registering and using JobCenterofWisconsin.com (JCW), Wisconsin's public labor exchange website. JCW provides multiple resources to match skill sets with job opportunities. Recent upgrades and enhancements to JCW allow greater skills matching capabilities for job seekers and employers.

UI claimants can also meet with a Licensed Job Service Career Counselor for assessments to assist in determining personal characteristics, experience and education as a way to match up with existing job postings on JCW. Job Center Resource Room staff can provide guidance on using JCW for resume-building and job matching, as well as access to a wide variety of workshops and one-on-one consultations.

UI claimants have access to comprehensive services and support and individualized guidance, if desired.

Services include, but are not limited to:

- Access to the Internet, phone, fax and in some areas, video conferencing, for re-employment purposes;

- Career exploration, interest and technical skills assessments delivered online or in coordination with a Job Service Licensed Career Counselor;
- Computer and technical skill enhancement;
- Resume development guidance;
- Workshops to enhance interview skills, online job search and networking, resume writing, etc.;
- Workshops and programs targeted to mature workers, re-entry individuals, veterans, etc.;
- Referrals to GED assistance from technical college system partners;
- Referrals to educational opportunities and short-term training programs;
- Supportive services referrals;
- Assistance with navigating online UI application and weekly claim filing;
- Skill Explorer – the State skill matching system that links skill sets to current employment opportunities locally, regionally and statewide;
- Outreach – which can include meeting clients at itinerant locations, career and job fairs; local libraries; and
- Referrals to on-line tutorials to add to skill development; each is accompanied by a brief quiz. Depending on the quiz outcome, recommendations are made for additional workshops, resume development, etc. that are available at the local Job Center.

A statewide network of Job Centers, provides internet, phone, fax and one-on-one assistance for job searching, resume creation, online application assistance and other services all job seekers. When individuals meet with a Job Service Employment and Training Specialist or Career Counselor, referrals are made to partners and Job Service programs for a wide range of services to increase current and future employment options. Included would be any application adaptation or assistance that may be needed for the job-seeker and/or UI claimant. Examples include:

- RESEA provided for UI claimants determined by UI;
- WIOA program referrals to determine eligibility; services may include short term training to increase employment options and opportunities;
- OVES services available and referrals to DVOP staff;
- On-Site technical ccollege services for GED assistance and other educational opportunities and options;
- Job Service Employment and Training Specialists provide individual and group services;
- Job Service Career Counselor referrals: Career interest and exploration assessments, Ability Profiler, Career Cruising, Career Locker and other assessment tools
- E-mail blasts to job seekers with information about job fairs, on-site employer recruitments, training opportunities, etc.

- All referrals are entered into the state's participant tracking system for reporting purposes and to track follow up with job seekers.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

***Background***

As required by 20 CFR Subpart B, 653.107, DWD will provide WP Act-funded services to migrant workers and employers of MSFWs. The State of Wisconsin provides services to ensure that the full range of employment and training and educational services are available on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs. The state also assists employers and job seekers through the operation of a basic labor exchange system as described in 20 CFR 652, Subpart A.

DWD has a unified MSFW program that is comprised of outreach workers, Foreign Labor Coordinator (FLC), and Migrant Law Enforcement (MLE) within the Bureau of Job Service. Our mission is to support Agricultural employers and farmworkers through an effective labor exchange system and ensure that employer and worker stakeholders are aware of their rights, responsibilities, and protections using an efficient and collaborative service delivery process.

DWD MSFW Program continues to strengthen its working relationships with MSFWs and employers so that each better understands how the Public Labor Exchange System (Job Centers), outreach services and the MLE unit can be of assistance. Efforts include promoting the use of the Agricultural Recruitment System (ARS) to employers and the full range of Public Labor Exchange services delivered via an outreach program designed to locate, contact, and inform migrant and seasonal farmworkers about their rights and all services available to them.

As required by 20 CFR Subpart B, 653.101, DWD DET will ensure that MSFWs are offered the same range of employment services, benefits, and protections that are provided to non-MSFWs including information on jobs, registration assistance, referral to a qualified job, vocational counseling and testing, and job training referral services. To ensure statewide compliance, DWD will make every effort to meet the Equity Indicators of Compliance as well as the Minimum Service Level Indicators. Wisconsin is designated as a "significant" state, and as such every effort will be made to conduct vigorous outreach activities in the significant MSFW service areas located in Wautoma and Beaver Dam and provide year-round services in those offices. Wisconsin will also continue its statewide outreach efforts across the state to ensure migrant and seasonal farmworkers have access to the wide array of Job Center services.

The MLE unit also provides additional services to workers and employers. The MLE unit enforces the Wisconsin Migrant Labor Law (Chapter 17 and WI Administrative code 301) on behalf of individuals who travel to Wisconsin for employment in agriculture, horticulture, and food processing and work in this state for less than ten months per year.

The Wisconsin Migrant Labor Law provides standards for wages, hours, and working conditions of migrant workers; certification, maintenance, and inspection of migrant labor camps; recruitment and hiring of migrant workers and guarantees the right of free access to migrant camps. The MLE unit also provides technical assistance to covered employers to promote compliance.

***Agricultural Activity and Projections***

According to the *2018 Wisconsin Farm Facts* and *2018 Wisconsin Agricultural Statistics* reported by the Department of Agriculture and Consumer Protection, Wisconsin ranks:

**Section VI, Table 2. Wisconsin Agricultural Production**

| | | |
|---|---|---|
| First | Cranberries Snap Beans | 6.1 million barrels 727.9 million pounds |
| | | |
| **Second** | Cabbage | 399 million pounds |
| **Third** | Potatoes | 2.8 billion pounds |
| | Sweet Corn<br><br>Carrots | 1.1 billion pounds<br><br>214 million pounds |
| | Green Peas | 142 million pounds |
| **Fourth** | Tart Cherries | 13.6 million pounds |

The Organic Agriculture in Wisconsin 2017 status report indicates per the 2014 Organic Survey conducted by the USDA National Agricultural Statistics Service shows that Wisconsin remains second only to California in the overall number of organic farms. As for horticultural and agronomic crops, Wisconsin is second in the total number of organic vegetable and melon farms. Wisconsin ranks first in the number of farms producing field-grown beans for processing, dry onions, and sweet corn. Wisconsin ranks second for the number of farms growing organic cranberries, third for organic raspberry farms and fifth for organic strawberry farms.

American ginseng has been cultivated in Wisconsin for more than 100 years. An article in *Corn Agronomy (Ginseng article)* notes that ideal growth conditions in Marathon County, WI have made it the ginseng capital of the United States. We produce 10% of the world supply of ginseng root. More than 90% of the nation's cultivated ginseng grown in the United States is grown in Wisconsin, and 90 to 95% of Wisconsin-grown ginseng is produced in Marathon county.

There are six main vegetable production regions in Wisconsin:

**Region 1** – The **Central Sands** vegetable production region is located in the center of the state and is characterized by sandy soils. Main vegetable crops are: potatoes, sweet corn, peas, and snap beans.

**Region 2** – The **Driftless** vegetable production region is located along the western border of Wisconsin and is characterized by bluffs and hilly terrain. Vegetable farming in this area is characterized by high concentration of fresh market and organic growers.

**Region 3** – The **Lower Wisconsin River** vegetable production region is located in southwestern Wisconsin and is characterized by hilly topography. Main vegetable crops in this area are: sweet corn, peas and snap beans.

**Region 4** – **Muck** farms are located on drained swamps. They are distributed throughout the state and are characterized by soils with high levels of organic material. Main vegetable crops in this area are: carrots, celery, mint and onion.

**Region 5** – The **Potato Seed** production area is located in Langdale County, near Antigo. Its isolation from commercial potato production areas helps keep disease incidence low. Main vegetable crop is seed potatoes.

**Region 6** – The **Ripon Plain** is a large region of eastern Wisconsin that is characterized by signs of glacial activity, silt loam soils and lime-rich fills. Main vegetable crops in this area are: sweet corn, beans and peas.

As reported by *Department of Agriculture: 2018 Wisconsin Agricultural Statistics,* Wisconsin is America's Dairyland but there is more produced and processed in our state than just milk and cheese.

Wisconsin agriculture contributes $104.8 billion annually to our state's economy.

Wisconsin is one of the top states in the production of the major processing vegetables.

- In 2018 Wisconsin grew: 6.58 million cwt of snap beans, 1.71 million cwt of carrots,

612,000 tons of cucumbers and 978,600 tons of green peas

- The state ranks third in the nation in potato production, harvesting potatoes on 71,000 acres
- The state is known for its fruit production, including its state fruit: the cranberry
- Wisconsin cranberry production totaled 5.55 million barrels. Growers harvested 20,600 acres. Wisconsin produces 62% of the nation's crop, making us the top cranberry producing state in the country
- The state also produces a large tart cherry crop, producing 10.9 million pounds
- Wisconsin boasts many apple orchards producing 49.0 million pounds of apples
- Wisconsin leads the nation in the export of ginseng roots and prepared/preserved cranberries and sweet corn

***Assessment of Farmworker Needs***

*Below is information from the need's assessment (2016-2019) provided by our WIOA 167 – NFJP grantee United Migrant Opportunity Services (UMOS):*

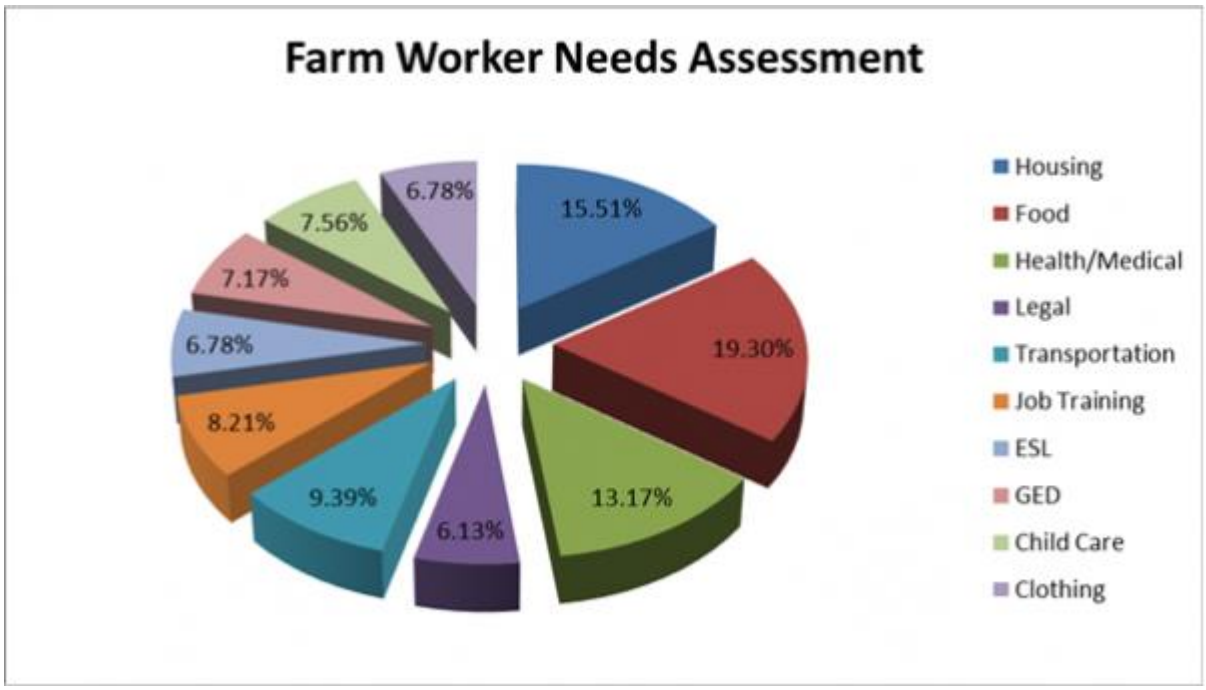
**Section VI, Table 3. Farmworker Needs Assessment 2016-2019**

| Needs | Highest | High | Medium | Low | Least |
|---|---|---|---|---|---|
| Housing | 269 | 14 | 21 | 15 | 103 |
| Food | 333 | 78 | 12 | 5 | 0 |
| Health / Medical | 229 | 30 | 61 | 59 | 49 |
| Legal | 197 | 2 | 18 | 15 | 190 |
| Transportation | 259 | 17 | 13 | 15 | 124 |
| Job Training | 207 | 26 | 52 | 51 | 88 |
| GED | 203 | 24 | 33 | 35 | 130 |
| Clothing | 204 | 16 | 84 | 52 | 67 |

Most of our migrant farmworkers arrive from Texas, though some from Florida and Georgia. More than 98% of our foreign H-2A workers are from Mexico. The primary language spoken is Spanish. During the "peak season" of July – September, we estimate more than 6,000 migrant workers (that includes an estimated 1,500 H-2A workers) are in Wisconsin. Approximately 3% of our farmworkers are local seasonal workers who are employed in our food processing industry.

Outreach staff may also assess the needs of the MSFWs and provide the identified necessary services and/or referrals.

**Section VI, Figure 1. Farmworker Needs Assessment 2016-2019**




2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS'

NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

See Section e.1.

3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

See Section e.1.

4. OUTREACH ACTIVITIES

It is DWD's goal to contact as many MSFWs as possible, using of all resources available. The State will continue to employ state merit staff Job Service employees to provide MSFW services are required by Wagner-Peyser Employment Services regulations.

Most of the outreach contacts occur during in person group orientations at the employer site, scheduled by the outreach staff. Whenever possible, these outreach sessions are coordinated with our WIOA 167 NFJP staff and other partner agencies such as La Clinica, Wisconsin Department of Public Instruction, Mexican Consulate and GED/High School Equivalency Program (HEP) providers. MSFW staff will also attempt to reach workers at the places they live or congregate.

The Migrant Labor Inspector staff ensures agricultural employers and their agents comply with requirements of the State Migrant Labor Law. Inspector responsibilities include conducting housing inspections, field sanitation visits and work agreement reviews, compiling and distributing the Migrant Population Report annually. The report provides information regarding employment of out-of-state seasonal workers in the agricultural, horticultural, and food processing industries. This report has been generated annually since the implementation of the Migrant Labor Law in 1978.

The population report numbers for the last four years are:

**Section VI, Table 4. Population Report**

| Year | Number of Workers |
|---|---|
| 2018 | 4,254 |
| 2017 | 4,153 |
| 2016 | 3,802 |
| 2015 | 3,545 |

***Outreach***

The State has three full time and three part-time bilingual Spanish permanent state employees assigned to MSFW duties. The State has four staff assigned to conduct outreach as required by Wagner-Peyser regulations. Two staff who conduct housing inspections are also expected to provide services to MSFWs and employers as required by both State and Federal regulations. As required by Federal Regulation 20 CFR 653.107 (4) the State has one bilingual full-time permanent state employees assigned to conduct outreach and assist farmworkers year-round in the One-Stop Centers that cover the significant office of Wisconsin Rapids.

The State has bilingual Spanish full-time merit staff in the following One-Stop Job Centers:

- Bay Central Job Center Green Bay
- Dane County Job Center Madison
- Fond du Lac Area Job Center Fond du Lac
- Menasha Job Center Menasha
- Sauk County Job Center Baraboo
- Walworth County Job Center Elkhorn
- Wisconsin Rapids Job Center Wisconsin Rapids
- WDC of Jefferson County Jefferson

Outreach staff has made the following outreach contacts in the past four years:

**Section VI, Table 5. Outreach Contacts**

| Year | Outreach Contacts |
|---|---|
| 2018 | 4,049 |
| 2017 | 3,750 |
| 2016 | 3,707 |
| 2015 | 3,181 |
| **Total** | **14,687** |

Our goal for PY16 – PY20 was to reach 12,400 migrant and seasonal workers during the four-year period (3,100 per year). The State surpassed our outreach goal.

Additional outreach will be conducted through the new mobile Career Lab. The Mobile Career Lab is equipped with 10 computers inside the unit. It has two large screen TV's to conduct workshops for participants within the unit. Additionally, a table with seating for six can be installed in the front inside the mobile unit for six lab tops to also assist other participants. The unit also has an outdoor awning that (depending on weather) can be used to have an outdoor learning center with additional lab tops and three tables that sit eight people each.

There is an outdoor TV unit as well that can be used for promotion or for and outdoor classroom for workshops.

The unit is ADA compliant. On the passenger side of the vehicle there is a door with a wheelchair lift that can also be used as a general lift if someone is unable to use the stairs.

Additionally, in the slide out of the vehicle, two of the computer stations are ADA compliant as well for participants to use. For hearing impaired, we have speakers throughout the vehicle as well as headsets to use for volume control.

Next year the state plans to coordinate outreach efforts with Family Health/ La Clinica mobile medical unit and provide services at several agricultural employers across the State including participation in UMOS Farmworker Appreciation Day picnic.

Providing technical assistance to outreach workers: MSFW Outreach workers are Job Service (Wagner-Peyser funded) staff assigned to provide employment services at Job Centers across the State of Wisconsin. Staff can attend professional development activities such as the WIOA Roundtable, WI Employment & Training Association (WETA) conference, and WI Annual Farmworker Summit. Staff can also participate in other state provided trainings and conferences. Staff are an integral part of collaborations, partner meetings, and activities and services provided at One-Stop Job Centers. At the pre- and post-season meetings updates and technical assistance are provided including Employment Service Complaint System, a review of the summary of farmworker rights and a review of the required services to be provided during outreach along with a review of the desk aid and how to properly report services in ASSET, the state reporting system.

Providing technical assistance to MSFW staff: Annually, MSFW staff attend conferences and meetings throughout the state focusing on MSFW activities, best practices, and any law changes that may affect the program. These opportunities include: DOL sponsored trainings; meetings and trainings directed by the MSFW Program Manager within DET;annual meetings providing information and services to MSFW Employers; and other appropriate trainings, conferences, and seminars that occur throughout the year. Subject matter experts provide updates on law changes, policy and/or procedure changes, best practices, communication with statewide partner agencies, and the opportunity to obtain information to pass on to the MSFW program participants throughout the season. MSFW staff is required to take annual Human trafficking trainings and, as appropriate, sexual harassment training through the state online training website "Cornerstone."

Key MSFW staff attend appropriate MSFW focused conferences and meetings, which may include: DOL sponsored trainings, meetings and trainings as directed by Job Service management, annual meetings providing information and services to MSFW Employers, and other appropriate trainings, conferences, and seminars that occur throughout the year.

As MSFW outreach staff are Job Service staff, they are required to complete training in Unemployment Insurance and identifying eligibility issues. This training is available on Cornerstone. Ongoing training and dissemination of updates is conducted through monthly all-staff conference calls, all-staff emails, and webinars, as needed.

See section e.4.

See Section e.4.

See Section e.4.

See Section e.4.

See Section e.4.

## 5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

Most of the outreach contacts occur through in person group orientations at the employer site. Whenever possible, these outreach sessions are coordinated with our WIOA 167 NFJP staff, migrant labor inspector, and other partner agencies such as La Clinica, DPI, Legal Action, and GED/HEP providers.

MSFW staff covering the significant office is available year-round as needed by MSFWs.

Services provided to farmworkers and agricultural employers though the one-stop delivery system: DWD have engaged and assisted agricultural employers throughout its history, but over the last two seasons, we have created a formal process to assist them with a more holistic approach. When an employer asks for assistance finding workers, we provide them with an array of options and advice. Typically, this is conducted in a formal meeting where we have key people from both DWD and the employer (management, business services, inspectors and outreach staff). Having this diverse group of individuals has created innovative ideas and has yielded the best results for both the employer and the workers.

Career & Training Services provided to MSFWs through one-stop centers under WIOA Title I: The MSFW coverage map (in English and Spanish) includes contact information and locations of outreach workers and inspectors. This map is widely distributed to workers and partners so that MSFWs who may not walk through the doors of a job center have the information available. Title 1 partners (including NFJP) are invited to attend and present at pre- and post-season meetings so that all MSFW service provider agencies are well-informed of resources available. In addition, outreach workers (Job Service staff) collaborate with Title I service providers (including NFJP grantee) co-located in one-stop centers to conduct joint visits to work sites and provide information and referrals to service providers and community organizations.

Information on the employment service complaint system is shared with our farmworkers at the time outreach visits are conducted. The required complaint posters are posted in Job Center Resource Rooms. The information is shared with other farmworker advocacy organizations and partners providing services to MSFWs at both the pre- and post-season meetings. The SMA also provides employment service complaint training at the NFJP staff training on a yearly basis. Information on the complaint system and link to the complaint form are also posted on our MSFW State website.

At the time that the state conducts employer provided housing inspections the migrant labor inspector provides information about the ARS system to the employers and outreach staff will also promote it during employer visits. ARS information will be provided to Job Service employer services team members for inclusion in their employer outreach efforts.

Most of the outreach contacts occur through in person group orientations at the employer site. Whenever possible, these outreach sessions are coordinated with our WIOA 167 NFJP staff, migrant labor inspector, and other partner agencies such as La Clinica, DPI, Legal Action, and GED/HEP providers.

MSFW staff covering the significant office is available year-round as needed by MSFWs.

We hold collaborative local meetings across the state to engage local partners that provide services to MSFWs and their employers. Meetings are held around Madison and in the Wisconsin Rapids/Wausau area. Other local, state, and government agencies invited to these meetings include: U.S. DOL Federal Wage & Hour, OSHA, EEOC, Department of Public Instruction Migrant Project (DPI), Legal Action of Wisconsin – Migrant Project, W2, Food share, Family Health/La Clinica, food pantries, and others.

Other collaboration events include participation in:

- Joint local MSFW pre- and post-season meetings
- NFJP Staff meetings, interagency meetings and trainings
- Quarterly Migrant Farmworker Coalition meetings
- Quarterly Governor's Council on Migrant Labor meetings
- NFJP sponsored Farmworker Appreciation Day Picnic
- Farmworker conferences such as National Association of Farmworker Organization (MAFO) and the Association of Farmworkers Opportunity Programs (AFOP)

To comply with federal regulations 653.107 (1-4), the outreach representative provides the following information to workers during their outreach presentation. This presentation is often done in groups but may also be conducted one-on-one at the migrant labor camp or at other MSFW group activities. The information provided includes:

- Job Center services available at the local one-stop offices
- Referrals to all qualified jobs (non-agricultural and agricultural)
- Referrals to Training services WIOA 167 and WIOA Title 1-B Adult, Dislocated Worker, and Youth
- Assistance in registering on JobCenterofWisconsin.com (JCW)
- Explanation and use of JCW job search functions
- Career Services
- Referrals to a variety of financial literacy information and services
- Career interest and exploration assessments
- Farmworker Rights (Federal and State Law – related protections with respect to the terms and conditions of employment)
- Information on Job Service Complaint System
- Information and referrals to other services including local and state Health and Human Services, Legal Action of Wisconsin, and Migrant health clinic
- Encourage for workers to visit the local One-stop to obtain the full range of employment and training services
- Printed pamphlets in English and Spanish that provide information about supportive services available at the Job Centers

- Labor Market Information
- Tax Credit programs
- Fidelity Bonding assistance
- Language access

Other tools used to conduct outreach are:

- Surveys sent to previous year employers to estimate number of MSFWs needed during the upcoming season and anticipate the arrival date of these employees
- Outreach Plan
- Joint outreach planned visits or events coordinated with WIOA-167 NFJP (UMOS), migrant labor inspector, DPI, HEP, Family Health/La Clinica, and other MSFW partners

## 6. OTHER REQUIREMENTS

### A. COLLABORATION

The state has a MOU collaborative agreement with the WIOA 167 NFJP grantee, UMOS. The agreement will be reviewed and renewed as required every four years.

The state is also known for its partnerships and collaboration with members of the WI Farmworker Coalition and the Governor's Council on Migrant Labor.

The State Monitor Advocate is assigned by the Department to staff the Council on Migrant Labor.

The Council on Migrant Labor consists of:

- Six employer representatives
- Six migrant advocate representatives, and
- Four legislators (2 Republicans and 2 Democrats)

Council members serve 1 to 3-year terms and are appointed by the Governor, except for the legislative members. Legislative members must be appointed by their respective Caucuses.

The Council on Migrant Labor was created in 1977 by Chapter 17, Section 103.90 – 103.97 of the Wisconsin State Statutes. The duties of the Council include advising the DWD on matters affecting migrant workers, ascertaining the conditions of farmworkers, promoting the coordination of state and federal laws concerning migrant workers, and reviewing the rules submitted by DWD. The Council meets on a quarterly basis and the meetings are attended by the SMA, Foreign Labor Coordinator, Inspector, and Management staff.

Wisconsin also has a Wisconsin Farmworker Coalition that meets on a quarterly basis prior to the Governor's Council on Migrant Labor.

The Wisconsin Migrant Coalition (WMC) was incorporated in 1998 as a statewide, issues-oriented coalition.

The Coalition was formed to advocate for the migrant and seasonal farmworkers that work and live in the State of Wisconsin.

The Coalition collaborates with other local, state, and federal government entities; organizations; employers; and communities that impact or are impacted by migrant and seasonal farm workers in the agricultural, food processing, dairy, and other industries.

In 2016, the Coalition changed its name to the Wisconsin Farmworkers Coalition (WFC) to more accurately reflect a broader workforce and the expanded industries being served by WFC members, affiliate agencies, and organizations.

The current WFC Board of Directors consists of organizations and leadership from UMOS, Inc. (NFJP grantee), Legal Action of Wisconsin, Madison College, University of Wisconsin System, University of Wisconsin-Milwaukee, Milwaukee Area Technical College, La Clinica Family Health Clinic, State of Wisconsin Department of Public Instruction, Wisconsin Council of Churches, one farmworker representative, and four at-large members.

Other advocates and supporters of farm workers regularly attend board meetings. The following MSFW staff attend the meetings: the SMA, foreign labor coordinator, inspector and management staff.

Other agencies and partners that attend these meetings include: Department of Agriculture, Migrant Headstart, Migrant Childcare, Migrant Housing, WI Anti-Human Trafficking Program, Mexican Consulate, and other organizations serving MSFWs.

Every year before the start and end of each season, the state holds MSFW pre- and post-season meetings. The attendees that present at these meetings include: SMA, MSFW outreach staff, migrant labor inspectors, foreign labor coordinator, and partner agencies and employers. Some of the partner agencies include: NFJP Grantee – UMOS, U.S. DOL Federal Wage and Hour, OSHA, Equal Employment Opportunity Commission (EEOC), Department of Public Instruction, Migrant Headstart, Migrant Childcare, Family Health La Clinica, Department of Agriculture, Trade and Consumer Protection (DATCP) – Clean Sweep and Worker Protection Program, Legal Action of Wisconsin, Mexican Consulate, FoodShare, Madison Area Technical College High School Equivalency Program and the Department of Labor Office of Federal Contract Compliance Program (OFCCP).

As new partners and agencies are identified that provide services to MSFWs, they are invited to attend the meetings and are added to the email distribution list so they can receive notices of future meetings.

## B. REVIEW AND PUBLIC COMMENT

The Combined State Plan was shared with the WI Farmworker Coalition, the Governor's Council on Migrant Labor, and state migrant employers. These groups include representatives from NFJP, federal enforcement agencies, state and local agencies, and partners and employers. The organizations were allowed comment during the Public Comment period.

Comments on the AOP were received from one organization. The SWA reviewed and considered the comments. (Comment letter received and SWA response are at the end of this section.)

List of organizations provided opportunity to comment:

- NFJP grantee – UMOS
- Legal Action of Wisconsin
- Governor's Council on Migrant Labor including legislators, advocates, and employer reps

- Department of Agriculture, Trade and Consumer Protection (DATCP)
- Department of Corrections
- Department of Health Services
- Department of Public Instruction (DPI)
- Department of Workforce Development (DWD):
    - Division of Employment and Training (DET)
    - Division of Vocational Rehabilitation (DVR)
    - Bureau of Registered Apprenticeship
- Equal Employment Opportunity Commission (EEOC)
- Family Health / La Clinica
- FoodShare
- High School Equivalency Program
- Mexican Consulate
- Madison Area Technical College
- Milwaukee Area Technical College
- Migrant Headstart
- Migrant Childcare
- Office of Veteran Services (OVES)
- OSHA
- US DOL Federal Wage and Hour
- WI Anti-Human Trafficking Program
- WI Farmworker Coalition
- WI Technical College System
- WI Workforce Development Boards (11)

LEGAL Action OF WISCONSIN
Since 1968

MILWAUKEE OFFICE
230 West Wells Street, Room 800, Milwaukee, Wisconsin 53203
tel 414-278-7722 | toll-free 888-278-0633 | fax 414-278-7126
new caller / intake 855-947-2529 | www.legalaction.org

January 8th, 2020

Governor's Council on Workforce Investment
WI Dept. of Workforce Development
201 E Washington Ave
Madison, WI 53702

*Submitted via survey and emailed to detwioa@dwd.wisconsin.gov.*

Dear Governor's Council on Workforce Investment:

On behalf of Legal Action of Wisconsin's Farmworker Project, we offer these comments about Wisconsin's Program Year 2020-2023 (PY20-23) Workforce Innovation and Opportunity Act ("WIOA") Combined State Plan and its impact upon our clients. In making these comments, we are focused on the Wagner-Peyser Act Program section, specifically the Agricultural Outreach Plan ("AOP"). Thank you for the opportunity to provide feedback.

Legal Action of Wisconsin ("LAW") is the largest provider of free, high-quality, civil legal aid to low-income individuals in Wisconsin. We ensure access to justice for Wisconsin residents by protecting their housing, safety, family stability, livelihood, and economic security. Through our statewide Farmworker Project, our staff represent and advise migrant and seasonal farmworkers ("MSFWs") who perform agricultural work in Wisconsin and their families. We represent both U.S. workers and workers with H-2A visas with civil legal concerns including recruitment and hiring concerns, unpaid wages, unemployment insurance issues, public benefits access obstacles, and unsafe working and housing conditions.

**Wagner-Peyser Program (Employment Services, pgs. 131-137, specifically Section 2)**

**Without articulated collaboration strategies between Unemployment Insurance ("UI") and Job Service staff, MSFWs will not have meaningful access to the UI and Job Service systems.**

The UI Division's exclusive reliance on an online system to process UI claims has created further barriers for Wisconsin's MSFWs to access the UI and Job Service systems. Many members of Wisconsin's seasonal workforce are not computer literate and have limited English proficiency, but the WIOA Combined State Plan does not currently address these limitations. Currently, vital Spanish language information regarding the UI rules and requirements is almost always only distributed to claimants online. Additionally, all claims must be submitted through the online UI portal.

*Serving Milwaukee and Waukesha Counties*

**Green Bay Office** Brown, Calumet, Door, Kewaunee, Manitowoc, and Outagamie Counties — tel 920-432-4645 | toll-free 800-236-1127
**La Crosse Office** Buffalo, Crawford, Grant, Jackson, Juneau, La Crosse, Monroe, Richland, Trempealeau, and Vernon Counties — tel 608-785-2809 | toll-free 800-873-0927
**Madison Office** Columbia, Dane, Dodge, Green, Iowa, Jefferson, Lafayette, Rock, and Sauk Counties — tel 608-256-3304 | toll-free 800-362-3904
**Farmworker Project** Statewide — tel 608-256-3304 | toll-free 800-362-3904
**Oshkosh Office** Adams, Fond du Lac, Green Lake, Marquette, Ozaukee, Sheboygan, Washington, Waushara, and Winnebago Counties — tel 920-233-6521 | toll-free 800-236-1128
**Racine Office** Kenosha, Racine, and Walworth Counties — tel 262-635-8836 | toll-free 800-242-5840

LSC United Way

Due to the barriers of the online UI system, Wisconsin's MSFWs have increased their reliance on *notarios* (individuals who represent themselves as qualified to offer legal advice or services concerning immigration or other matters of law but have no such qualification) to help them complete the UI process and file claims online. Due to the increased reliance on *notarios*, many farmworkers receive incorrect information regarding the UI rules and requirements, unfortunately leading farmworkers to receive overpayment determinations. For example, in LAW's experience representing farmworkers with UI issues, many workers receive "advice" from *notarios* which indicates that workers can do a "door to door" job search to meet the job search requirements. This is inaccurate and costly misinformation, that could be prevented by the UI Division being proactive and accessible to MSFWs, especially off-line. By closely collaborating with the Texas Workforce Solutions offices, the UI Division and Job could offer Wisconsin's farmworkers more meaningful access to the UI system and Job Service supports. For more information, please see WI Law Journal Article from 2017 (https://wislawjournal.com/2017/11/22/migrant-workers-tripped-up-by-new-work-search-rules-slapped-with-fraud/).

Further, current DWD policies bar Job Service staff from assisting farmworkers in completing UI applications or mailing UI appeals. These policies further disenfranchise Wisconsin's MSFWs because farmworkers are not provided the services they need to understand and access the UI system.

The WIOA Combined State Plan does not articulate ways in which the Division of Employment and Training and the UI Division will work together to ensure work search requirements assigned to Wisconsin's MSFWs are obtainable and appropriate for the labor market of farmworkers. Many of the home communities of Wisconsin's farmworkers face high levels of unemployment, and for this reason, farmworkers migrate to Wisconsin to seek agricultural jobs. Under the UI Division's current interpretation of what constitutes a valid work search, many MSFWs are not able to complete the required four work search activities each week. Wisconsin's laid off MSFWs further struggle with finding employers willing to hire or accept applications from prospective candidates who are only available for work during the agricultural off seasons. These specific concerns are not currently addressed by the WIOA Combined State Plan.

**Wagner-Peyser Program (Agricultural Outreach Plan, pgs. 137-154)**

**The AOP does not clearly articulate how Wisconsin's domestic workforce will be informed of their right to receive jobs that are subject to the clearance order system.**

The usage of the H-2A program has increased significantly in Wisconsin since 2013. It was reported there were 1,804 H-2A positions in Wisconsin in 2019, a 925% increase since 2013 (see DWD Bureau of Job Service 2019 Migrant and H-2A Worker Population Report).

20 CFR subpart B § 653.102 requires that "all SWAs must make job order information conspicuous and available to MSFWs by all reasonable means…" Further, 20 CFR subpart F § 653.501(d)(12) specifies "if the labor supply SWA accepts a clearance order, the SWA must actively recruit workers for referral…. " 20 CFR, Subpart F, § 653.500 mandates that the sub-section requirements apply to both MSFW and non-MSFW job seekers. However, few of Wisconsin's domestic MSFWs are aware of their right to apply for jobs listed in H-2A clearance orders. LAW's outreach workers have seen an increase of "segregated work crews" in which foreign H-2A workers perform one set of tasks and potentially qualified US workers work in parallel crews and may be unaware of their right to apply for H-2A jobs.

Workers experience barriers to accessing H-2A jobs if Job Service staff are not educating workers about these job opportunities and if Job Service call center staff are not properly trained to provide referrals and information to workers who seek more information. Additionally, many MSFWs are Spanish-only speakers who work long hours and face barriers to make calls during regular business hours.

Therefore, many MSFWs cannot benefit from Job Service call centers that are only available during traditional business hours and online resources that are not available in Spanish. Wisconsin's unified delivery of MSFW services could be used advantageously to ensure that that domestic MSFWs are aware of H-2A jobs that may be available.

**Farmworker population changes may impact "significant" MSFW service areas. It is critical to consistently update analysis of migrant populations in order to identify and provide services to emerging populations.**

The demographics of farmworkers are changing. Many MSFW are getting older (see https://www.ers.usda.gov/topics/farm-economy/farm-labor/#employment). As illustrated in the 2019 DWD Bureau of Job Service Migrant Population report, there are more jobs in food processing now than in agricultural crop work. These changes in demographics and in type of agricultural work has caused changes to the "significant" MSFW population centers in Wisconsin. According to the 2019 DWD Migrant Population report, the counties with the most MSFWs (not including H-2A workers) were Fond du Lac County, Columbia County, Dodge County, Portage County and Barron County. These population shifts should shape the work of Job Service as they provide services to MSFW. It is important to study and identify where new "significant" service areas may develop so that Job Services can be best provided.

Additionally, the WIOA Combined State Plan offers very little analysis of the H-2A program and its impact on the farmworker population in Wisconsin. The lack of inclusion and analysis of the H-2A program is disingenuous to the current reality of agricultural labor in Wisconsin and does a disservice to Job Service staff trying to plan and provide effective services to MSFW and agricultural employers.

**Migrant Law Enforcement ("MLE") officers are critical to ensuring that farmworker rights are respected and that MSFW housing is safe and habitable. MLE officers are not Job Service outreach workers.**

The WIOA Combined State Plan appears to include MLE officers as part of the Job Service outreach staff, which hurts MSFWs in Wisconsin. Job Service workers and MLE officers both serve important, but different, roles within an AOP. While the total number of farmworkers in Wisconsin is increasing (see DWD Bureau of Job Service 2019 Migrant and H-2A Worker Population Report), there are just two MLE officers to oversee and enforce all state labor protections related to MSFWs. The work of MLE officers is critical and requires committed time to complete properly - work that is disadvantaged by also doing Job Service outreach. Ultimately, requiring this split harms MSFWs in Wisconsin and Legal Action's clients.

In conclusion, activities under the Wagner-Peyser Act have a profound impact on Wisconsin MSFWs and their ability to obtain and maintain farm labor jobs, as well as to work with dignity and protect their rights. LAW is committed to serving Wisconsin's farmworkers and we appreciate the opportunity to provide comments on the WIOA Combined State Plan. We hope these comments will be taken into consideration as part of continuous efforts to improve the performance of these programs and their service to our state's migrant and seasonal farmworkers.

Sincerely,

Mariah Hennen
Legal Action of Wisconsin
Farmworker Project Program Manager

Erica Sweitzer-Beckman
Legal Action of Wisconsin
Farmworker Project Legal Director & Attorney

**Department of Workforce Development**
**Secretary's Office**
201 E. Washington Avenue
P.O. Box 7946
Madison, WI 53707
Telephone: (608) 266-3131
Fax: (608) 266-1784
Email: sec@dwd.wisconsin.gov

**STATE OF WISCONSIN**
**DWD**
Department of Workforce Development

**Tony Evers**, Governor
**Caleb Frostman**, Secretary

May 5, 2020

Mariah Hennen
Erica Sweitzer-Beckman
Legal Action of Wisconsin
230 W. Wells Street, Room 800
Milwaukee, WI 53203

Dear Ms. Hennen and Ms. Sweitzer-Beckman:

Thank you for providing comments on the Wisconsin Program Year 2020-2023 WIOA Combined State Plan. We have reviewed and considered your comments in developing the Agricultural Outreach Plan (AOP). Please find our responses to your comments below. Subject headings from your letter have been reproduced below.

**Comment**:
*Without articulated collaboration between UI and Job Service staff, MSFWs will not have meaningful access to the UI and Job Service systems.*

**Response:**
Although UI and Job Service are both DWD programs, they are administered by different divisions. DWD does understand the need for collaboration among its divisions and its obligation to provide meaningful access to individuals with limited English proficiency (LEP).
As you note, many of Wisconsin's seasonal workforce are LEP individuals with a preferred language of Spanish and are entitled to receive vital information about the UI and Job Service programs in Spanish. You also note that many are not computer literate. To assist LEP individuals and other claimants who may have difficulties using the online portal, UI provides toll free telephone assistance at (844) 910-3661 weekdays between 7:35 a.m. and 3:30 p.m.

As you see from the above, the hours for assistance begin earlier than traditional business hours and a toll-free number is provided.

Additionally, UI and Job Service programs provide Babel notices in all communications of vital information, such as hard copy letters or decisions and those communications posted on DWD's web sites. A copy of DWD's Babel notice can be found here: https://dwd.wisconsin.gov/uiben/applylb.htm.

You suggest that DWD has policies that bar Job Service staff from assisting farmworkers in completing UI applications or mailing UI appeals. There is no such DWD policy; rather, as part of the one-stop delivery system, migrant seasonal farmworkers receive assistance from Job Service, as any claimant would, by directing them to the appropriate web portal or telephone number. This assistance should be offered in the preferred language of the claimant. If that has not been your clients' experience, please let us know.

Job Service coordinates UI-specific training for statewide Job Service and partner staff who provide services and assistance in Job Centers. The training ensures that UI programs and services have a presence in Job Centers throughout the state. Job Service staff receive specific training on eligibility issues, as well as step-by-step instructions and a UI "hotline" phone number for further consultation when needed. All UI and Job Center staff are provided training on language access upon hire and DWD is working on in-house trainings to specifically address LEP issues.

**Comment:**
*The AOP does not clearly articulate how Wisconsin's domestic workforce will be informed of the right to receive jobs that are subject to the clearance order system.*

**Response**:
We agree with your observation of DWD's obligation under the Wagner-Peyser Act regulations to provide job seekers, including MSFWs, with information about job orders processed through the clearance system under the Agricultural Recruitment System (ARS). DWD has requested technical assistance from DOL to better implement the ARS in Wisconsin.

See above response to how DWD addresses language barriers. As far as the hours of operations of the Job Service call centers, DWD has noted your suggestion and will consider how that may affect DWD staff, operations and resources.

**Comment:**
*Farmworker population changes may impact "significant"' MSFW service areas. It is critical to consistently update analysis of migrant populations in order to identify and provide services to emerging populations.*

**Response:**
DWD agrees that the farmworker population has evolved and shifted over the past several years. The locations of significant populations are taken under consideration when planning outreach activities.

I note that LAW has provided supplemental information about the analysis of the H2-A program and its impact on farmworker population in Michigan. While this information was not provided as part of LAW comments, DWD will consider this type of analysis in the future.

**Comment:**
*Migrant Law Enforcement ("MLE") officers are critical to ensuring that farmworker rights are respected and that MSFW housing is safe and habitable. MLE officers are not Job Service outreach workers.*

**Response**:
DWD does not employ Migrant Law Enforcement Officers. Its migrant labor inspectors, whose authority is created by Wis. Stat. § 103.905, are not law enforcement officers. While the inspectors are employees of the same division that house Job Service and are knowledgeable about the services available to MSFWs through Job Service, they perform the statutorily required inspections and duties under the state migrant

labor law. DWD will note your concern that additional staff are needed for inspection duties as DWD considers allocating its resources and staff for operational needs.

Thank you again for your thoughtful feedback of the Wisconsin Program Year 2020-2023 WIOA Combined State Plan.

Sincerely,

Caleb Frostman
Secretary
Wisconsin Department of Workforce Development

C. DATA ASSESSMENT

Equity Ratio Indicators:

1. Referred to Jobs

2. Received staff assisted services

3. Referred to Supportive Services

4. Career Guidance

5. Job Development

In PY19, the state met 4 out of 5 Equity Ratio Indicators. Did not meet: referred to Career Guidance (quarters 3 & 4)

In PY18, the state met 3 out of 5 Equity Ratio Indicators. Did not meet: referred to Jobs (quarters 3 & 4) and referred to Career Guidance (quarters 2, 3 & 4)

In PY17, state met 3 out of 5 Equity Ratio Indicators. Did not meet: Referred to Career Guidance (quarters 1 & 2) and Job Development contact (quarter 2)

In PY16, state met 4 out of 5 Equity Ratio Indicators. Did not meet: Referred to Career Guidance (quarter)

Minimum Service Level Indicators:

1. Placed in a job

2. Wages 2nd quarter after exit

3. Placed in long-term non-ag job

4. Review of significant office

5. Field checks

6. Outreach contacts per staff day

7. Timely process of complaints

In PY19, the state met 7 out of 7 Minimum Service Level Indicators.

In PY18, the state met 7 out of 7 Minimum Service Level Indicators.

In PY17, the state met 6 out of 7 Minimum Service Level Indicators. Did not meet: Placed in a job (quarters 1 - 4)

In PY16, the state met 6 out of 7 Minimum Service Level Indicators. Did not meet: Placed in a job (quarters 2, 3 & 4)

Efforts to contact, provide and record all services provided to our MSFW's will continue along with continued training of staff for accurate reporting.

A desk aid and staff training are provided at the pre-season meeting. Ongoing training and updates are provided via webinars and through emails.

The state is continuing to improve on the system for data reporting to ensure information is reported and capture accurately.

Why did State not meet Equity Indicators?

MSFWs are primarily recruited in their home state and have committed to working for their employer for the season. At the time of arrival to Wisconsin, they are not interested in referral to other employment/job development or career guidance. The majority of our migrant workers have worked for many years or decades for the same employer. It is not unusual to see three generations working for the same employer year after year. It is very rare that a worker would travel without having a job offer and housing in place. When that happens staff will make the appropriate referral to a job the worker is qualified to do. Supportive services such as food, gas money, unemployment insurance and/or emergency services is what the workers request assistance with on the onset of their season due to unpredictable weather that may delay their start dates of employment.

Staff encourage workers to reach out at the end of season if they are seeking other employment. After the season is over, workers are very anxious to travel back to their permanent homes. They may seek assistance in starting their Unemployment Insurance (UI) claim before they travel. Housing is a barrier for workers wanting to stay. Non – agricultural companies wanting to hire MSFWs do not provide housing.

Solutions:

- As part of the ARS system clearance job orders (including H-2A) are shared with staff to try to locate and refer qualified workers.
- At each orientation or point of contact staff will ask MSFWs if they wish to share their contact information to be notified of employment opportunities and would follow up periodically to see if career guidance or job referrals/development are desired.
- SWA has implemented a report of all registered MSFWs for staff to contact and follow up to promote referrals to employment, job development and career guidance.
- State will continue to review and ensure accuracy of performance reports

D. ASSESSMENT OF PROGRESS

During PY16-19 (July 1, 2015 – June 30, 2016), the State of Wisconsin achieved all its established goals as follows:

- 14,687 MSFW workers were contacted via outreach (our goal was 12,400)
- 1 full-time and 3 part-time bilingual State staff conducted outreach during the season
- 2 full-time migrant labor inspectors performed housing inspections, field sanitation visits, work agreement reviews, and conducted post-occupancy inspections
- Outreach visits were coordinated with WIOA 167 – NFJP career planners across the state
- Held two Pre- and Post-Season meetings across the state in collaboration with NFJP. MSFW service providers and employers were invited to review services available, provide updates and discuss expected issues for the season
- SMA met at least quarterly with NFJP grantee to share information and improve services to farmworkers
- SMA attends and participates in the WI Farmworker Coalition meeting and the Governor's Council on Migrant Labor

- State, SMA, and NFJP have an established MOU
- SMA attended MAFO conference
- SMA attended AFOP conference
- SMA attended DOL SMA trainings
- MSFW staff received annual Human Trafficking training

E. STATE MONITOR ADVOCATE

The State Monitor Advocate has reviewed and approved the State provided Agricultural Outreach Plan.

WAGNER-PEYSER ASSURANCES

| The State Plan must include | Include |
|---|---|
| 1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3)); | Yes |
| 2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements; | Yes |
| 3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and | Yes |
| 4. SWA officials:<br>1) Initiate the discontinuation of services;<br>2) Make the determination that services need to be discontinued;<br>3) Make the determination to reinstate services after the services have been discontinued;<br>4) Approve corrective action plans;<br>5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;<br>6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and<br>7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing. | Yes |

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Employment (Second Quarter After Exit) | 68.0% | 71.0% | 68.0% | 71.0% |

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Employment (Fourth Quarter After Exit) | 66.0% | 70.0% | 66.0% | 70.0% |
| Median Earnings (Second Quarter After Exit) | $5,600 | $6,200 | $5,600 | $6,200 |
| Credential Attainment Rate | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Measurable Skill Gains | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Effectiveness in Serving Employers | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] |

*1*

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

### A. ALIGNING OF CONTENT STANDARDS

Wisconsin aligned its Adult Education standards to College and Career Readiness (CCRS) standards in 2013-14 and formally adopted these new standards. The CCRS-aligned WTCS Adult Basic Education standards are aligned with college and work expectations; are clear, understandable and consistent; include rigorous content and application of knowledge through high-order skills; build upon strengths and lessons of current state standards; and are evidence-based. The curriculum also features integrated reading and writing instruction contextualized within the three adult literacy themes of 1) Financial Literacy, 2) Civics Literacy, and 3) College Transition. All AEFLA grantees are required to adopt these curriculum standards as a condition of receipt of AEFLA funds.

WTCS has since led a system-wide effort for the purpose of exploring how common standards could be implemented to improve college and career readiness for all students. Professional development on the new standards is ongoing and includes providers creating and sharing model curricula and learning plans, as well as instructional strategies.

In October 2017 and concluding April 2019, the WTCS aligned its English language learning curriculum standards to the CCRS-aligned standards using the same approach used in the alignment of the Adult Education curriculum standards. The new ELL curriculum meets WIOA requirements as well as the English language proficiency standards (ELPS) requirements and is framed in six levels of skill and mastery. Previous curriculum had several courses for each level, whereas the new curriculum merges those into one course per level. The new curricula is published on the repository for easy local import and is also made available for viewing through an open access link found at https://wtcsystem.wids.org.

### B. LOCAL ACTIVITIES

### ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

The WTCS awards funds to eligible providers who have demonstrated effectiveness in providing adult education and literacy services. Local grants will be distributed based on the ability to meet the guidelines and purposes of AEFLA outlined in WIOA and will serve individuals who: (a) have attained at least 18 years of age; (b) are not enrolled or required to be enrolled in secondary school under the Wisconsin law, (c) are basic skills deficient; and/or (d) are English language learners.

AEFLA funds will:

- Assist adults to become literate and obtain the knowledge and skill necessary for employment and economic self-sufficiency;
- Assist adults who are parents become a full partner in the education development of their children;
- Promote transition from adult education to postsecondary education and training through career pathways; and
- Assist immigrants and English language learners to improve reading, writing, math, speaking, and comprehending the English language and acquire understanding of American government, individual freedom, and responsibilities of citizenship.

Eligible providers who are awarded funding will need to follow all required AEFLA curricular and programmatic component expectations, including making sure their workforce/integrated instruction still follows the WTCS curriculum standards in English, Language Arts, and Mathematics. These standards will incorporate workforce readiness skills, digital literacy competencies, and will provide opportunities for contextualizing competencies throughout. In the application for funds, eligible local providers will be required to describe their plans for supporting the transition to and implementation of the state's standards. In the local plan, local providers will be required to address professional development and ongoing assistance for all instructors, development and acquisition of curriculum and instructional materials aligned to the standards, monitoring and ongoing technical assistance, and a timeline for the providers' complete transition to and implementation of state standards.

Eligible providers will be required to participate in all required meetings and professional development, participate in all grant monitoring and evaluation processes, and participate in technical assistance efforts.

Allowable activities funded under WIOA Title II include Wisconsin adult education, literacy, workplace adult education and literacy activities, family literacy activities, English language acquisition activities, integration of English literacy and civics education, workforce preparation activities, and integrated education and training. WIOA Title II funding is approved and overseen by WTCS staff, which includes, the state's ABE Director and designated staff for Adult Education, ELL, Corrections/Re-entry, Performance Analysis/Continuous Improvement, and the WTCS Board.

Activities funded under WIOA Title II are undertaken by any eligible provider or combination of eligible providers. All Title II applicants provide assurances that they will fully implement the requirements and activities authorized under WIOA and related legislation, including Section 502 of WIOA and Section 427 of the General Education Provisions Act.

In 2020, the WTCS will hold an open competition for funding with new grantees to be identified and related funded activities starting on July 1, 2021. The open competition recognizes the

broad array of eligible applicants and emphasizes partnerships and career pathway-centered collective efforts whenever possible.

The WTCS Board has received detailed guidance from the DoED, Office of Career, Technical and Adult Education regarding these grant opportunities and the award process. All Title II grant categories will be open in a direct and equitable manner as per WIOA and DoED requirements. The funds will be made available through a competitive application process, and the grant announcement to be disseminated directly to providers is the same announcement shared with all eligible providers. These funding opportunities will be posted on the agency website, shared through regional media, and posted on the state's Public Notices informational website. All eligible providers will be provided the same information and all applications will be evaluated using the same scoring criteria. These criteria are aligned with the directions contained in this Plan and the 13 considerations required by federal legislation.

In addition, the scoring rubric used to rate applications will be explicitly based on the 13 considerations, including factors such as:

1. The degree to which the eligible provider would be responsive to regional needs as identified in the local workforce development plan;
1. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
1. The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy and the degree to which those improvements contribute to the eligible agency meeting its state-adjusted levels of performance for the primary indicators of performance described in §677.155;
1. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local workforce board plan, as well as the activities and services of the one-stop partners;
1. Whether the eligible provider's program is of sufficient intensity and quality and based on the most rigorous research available so that participants achieve substantial learning gains; and uses instructional practices that include the essential components of reading instruction;
1. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available, including scientifically valid research and effective educational practice;
1. Whether the eligible provider's activities effectively use technologies, services, and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning and how such technologies, services, and systems lead to improved performance;
1. Whether the eligible provider's activities provide learning in context, including integrated education and training, so an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and exercise the rights and responsibilities of citizenship;

1. Whether the eligible provider's activities are delivered by instructors, counselors, and administrators who meet any minimum qualification where applicable and who have access to high-quality professional development, including electronic means;
1. Whether the eligible provider coordinates with other available education, training and social service resources in the community, such as establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, Local Workforce Development Boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries in the development of career pathways;
1. Whether the eligible provider's activities offer flexible schedules and coordination with federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;
1. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes and to monitor program performance; and
1. Whether the local area in which the eligible provider is located has a demonstrated need for additional English language acquisition programs and civics education programs.

These grants will be awarded on a four-year basis, with updated applications due each year.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Correctional education is provided and supported by up to 20% of the 82.5% funds from the WTCS AEFLA grant awards for 2021-2025. These funds are awarded to eligible providers under Section 225 of the Act that have demonstrated effectiveness in corrections education and in educating other institutionalized individuals. WTCS incarcerated and re-entry programs provide meaningful adult education with a goal of successfully transitioning those currently incarcerated to a productive return to their community and to work. These educational programs reduce recidivism by providing a variety of educational and career opportunities to ensure successful re-entry into the community. In 2019, the WTCS has a dedicated staff that work specifically with corrections and re-entry education and programming.

Funds are allocated to provide programming within correctional institutions. Priority is given to serving individuals who are likely to leave the institution within five years of participation in the program. The funds will be made available through the previously mentioned competitive grant application process. The competitive grant announcement is shared directly with providers through posting on the WTCS website and through posting it on the state's Public Notices site. All eligible providers are provided the same information and all applications are evaluated using the identical scoring criteria. Applications are scored by multiple readers utilizing the published guidelines for scoring. Grants are awarded on a four-year cycle with updated applications submitted each year. This process meets the requirements specified in Title II of WIOA with every effort made to ensure direct and equitable access.

Eligible providers will provide educational programming for adult offenders in correctional institutions, including:

1. Adult education and literacy services
2. Secondary and Postsecondary credit and credentials
3. Integrated education and training
4. Career pathways
5. Pre-apprenticeship education
6. Concurrent enrollment
7. Peer tutoring
8. Transition to re-entry and post-release services with the goal of reducing recidivism

This program list is permissive under WIOA guidelines, however implementation of every program on the list is not required. The WTCS requires that the eligible provider's grant application describe and define the academic program areas in which they will provide academic preparation and instruction and describe how the agency will deliver these programs in partnership with the correctional institution. The WTCS priorities include increasing the number of incarcerated and re-entering adults that complete a secondary/high school credential and postsecondary credential. The state of Wisconsin offers six options for adults to complete a high school credential and integrated education and training opportunities.

## D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

WTCS will make awards to eligible providers through a competitive application process, ensuring that all applications are evaluated using the same rubric and scoring criteria. Funds will be used to support the operational expenses of local IELCEP programs, including teacher salaries and benefits, classroom supplies, textbooks, and other items necessary to carry out instruction in English language acquisition, workforce preparation activities, and civics education.

The WTCS Grants Office will ensure that all eligible providers have direct and equitable access to apply for multi-year grants by notifying potential providers of the funding competition and posted guidelines utilizing various regional and statewide media, the agency's website, and posting it on the state's Public Notices website. This process ensures that the same grant announcements, application, and proposal process are used for all prospective eligible providers. WTCS expects to issue these multi-year grant awards ranging from $25,000 to $75,000 dependent on the proposed number of participants to be served and reported to the National Reporting System (NRS), utilizing the state's client reporting portal. Learners qualifying for NRS enrollment must have 12 hours of instruction and an approved pre-test score. Requests for grant funding should be proportional with the number of students served.

Funds in this category will be used to provide educational programs for adults (including professionals with degrees and credentials in their native countries) that enable to achieve competency in English language and acquire basic and more advanced skills needed to engage effectively as parents, workers and citizens in the United States. WTCS will fund IELCE services that include instruction in literacy, English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. These IELCE services prepare ELL adults for placement in unsubsidized employment in in-demand industries and occupations that

lead to economic self-sufficiency. Additionally, these services are integrated closely with the local workforce development boards, who assist in informing the activities of the local IELCE programs as identified in the grant guidelines.

An eligible provider who receives funds through the IELCE program must incorporate IET by:

- Co-enrolling participants in integrated education and training as described in Stat. 463.74, subpart D, that is provided within the local and regional workforce development system from other sources other than section 243; or
- Using funds under section 243 to support integrated education and training activities as cited in 463.74, subpart D.

Funds in the IELCE grant category are allowable and often used for the following activities:

- Integrated English Language and Civics Education (IELCE) in all six levels of ELL;
- Preparing students for programs leading to high school credentialing and its equivalency;
- Integrated Education and Training (IET); Integrated Education and Training (IET) is a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.
- Career Pathways' related services and instruction including the ELL/ABE portion of concurrent enrollment in ELL/ABE and occupational training;
- Workforce Preparation (this includes employability skills); and
- Numeracy and/or Digital Literacy.

Wisconsin Title II IELCE offerings are informed by the analysis of regional labor market data, designed through ongoing collaborative activities with regional employers and local workforce development boards, and maintained to ensure industry relevancy through IELCE modification activities. Collectively, these intentional efforts ensure that IELCE offerings provide participants with employment in in-demand industries and occupations that lead to economic self-sufficiency.

Before formal approval from the WTCS Office, each IELCE offering will be fully vetted through a labor market needs assessment to ensure the offering is designed to prepare adults for employment in in-demand industries and occupations. The needs assessment process will include the collection, analysis, and synthesis of regional employer and local workforce development board input. Needs assessment data will be collected through surveys, focus sessions, or discussions with workforce system partners. Additionally, each IELCE offering will be aligned with at least one occupational classification code from the Department of Labor's Standard Occupational Classification (SOC) system. Together, coordination with workforce system partners, regional employers, and alignment with the SOC system will support intentionality of IELCE to ensure gainful employment for participants.

Providers of IELCE collaborate with workforce system partners and regional employers to design IELCE curriculum and integrate the appropriate workforce preparation activities. Curriculum design efforts informed by workforce partners ensure IELCE learning activities provide participants with occupation specific knowledge, skills, and abilities that are vital for

employability upon exit from the program. Through the curriculum design process with workforce system partners, IELCE participants have immediate labor market value upon exit from the program.

Once an IELCE is fully implemented and enrolls participants, employer partners continue to be engaged through the IELCE modification process. Providers of IELCE coordinate annual IELCE review activities with workforce system partners to verify continued IELCE curriculum and learning activity relevancy in relation to the pace of change in the workplace and industry. As appropriate, IELCE curriculum will be modified based on the findings from IELCE review activities. These modification activities ensure that IELCE career pathways are responsive to local workforce needs and provide participants with the skills to obtain employment.

Providers of IELCE services must work directly and jointly with their local workforce development system to carry out the activities of the program by jointly coordinating and developing programming that will assist adult learners with getting occupational skills integrated with English language acquisition and workforce preparation leading to economic self-sufficiency.

Jointly with the local workforce system, all recipients of IELCE grant awards work on determining the type of services needed by each participant in the program; and after the initial assessment of their English language skills, are offered employability, mathematics and digital literacy skills. IELCE providers make appropriate referrals to their local one-stop-center for additional services available to participants including occupational skills training, assistance with tuition, and IET programming in coordination with other WIOA partners, including Title I. Participants with other barriers to employment including transportation and childcare are referred to other WIOA partners for assistance. Additionally, the local one-stop-centers and the IELCE providers coordinate on service and instructional hours to best meet the needs of program participants.

Other examples how IELCE providers and WIOA partners collaborate include monthly WIOA leadership and committee meetings, agency updates, creating and participating in joint trainings, coordination of professional development (e.g. WIOA Roundtable, Common Ground Conference) and ongoing assessment of state and local training needs and providers/availability for occupational skills training.

## E. STATE LEADERSHIP

### 1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

**A)** WTCS utilizes Title II funds to carry out the required State Leadership activities that enhance the quality and compliance of the adult education system and to support the development of innovative models of service delivery. WIOA in Wisconsin relies on active collaborative work by representatives of all core and supplemental partners. As part of this collaboration, there are a number of cross-title committees that meet to assess statewide needs, including the WIOA Leadership Team, Policy Team, Training and Communications Team, and the Performance Accountability team (all of which include Title II engagement). Title II continues to plan, offer, and evaluate professional development with WIOA core partners and related programs. Examples of these jointly designed activities include the development of WIOA 101 Training, a cooperatively-designed WIOA website that focuses on cross-title staff resources and training materials, and cooperative planning of regional and statewide professional development such

as the Wisconsin WIOA Roundtable Conference and the adult education Common Ground Conference. Due to COVID impacts, planning is underway for deploying much of this professional development through virtual means as well as through possible face-to-face training.

**B):** WTCS utilizes Title II state leadership funds to support professional development to ensure high-quality adult education programs that align with the workforce needs and educational attainment rate goals for the state. Utilizing local, regional and state census, wage and workforce data, WTCS ensures providers understand student and program-level data, utilizing one-on-one touchpoints, monthly meetings and virtual trainings. WTCS utilizes ongoing assessment and feedback (formal and informal), provider surveys and program monitoring to inform the key needs in professional and program development. An example of these efforts can be found in the monthly provider data reviews that involves ongoing feedback and assistance to programs related to their performance data, which in turn weighs into the annual risk assessment process. Programs with participant performance concerns, data management, and other significant program issues like turnover in program staffing and/or decreased participant engagement or gains result in deeper assessment (may include calls and on-site visits) to evaluate the programs training needs, including staffs' understanding of Title II and WIOA vision and the specific targets for the region and the program.

In addition, all Title II providers participate in ongoing monitoring and review to ensure program compliance and technical assistance needs. These review cycles are annual and can include desk, virtual and on-site visits. Results from reviews lead to 1) professional development planning for specific programs for the current year, and 2) system-office-directed guidance for modifications to the next year's Title II grant application, specifying outcomes, activities, and resources that address the quality issues. These review findings are also synthesized across the WTCS and findings are used to inform future WTCS-coordinated professional development offerings.

Professional development and technical assistance planning and deployment is led by WTCS's Adult Education staff and Performance Analysis and Continuous Improvement staff, with assistance available from the research, student services, and Faculty Quality Assurance System staff. The WTCS also coordinates with the state's literacy organizations to support instructional training and support for the approximately 300 paid staff and 4,000 volunteer tutors across the state.

Finally, the WTCS Title II team gathers input as to the need for local program professional development and technical assistance needs as it:

1) analyzes professional development needs for any new provider,

2) analyzes reports of professional development strategies in the AEFLA local plans required of grantees, and

3) partners with the WTCS's Faculty Quality Assurance System, which establishes the minimum academic and teaching requirements for college adult education faculty. This includes professional development plans with approved educational competencies, ongoing development of occupational experience, mentoring, and faculty evaluation. https://wtcsystem.edu/about-us/governance/system-office/educational-services/student-success/faculty-quality-assurance

To be responsive to the ongoing needs of Title II programs, ongoing instructional development activities are offered including Student Achievement in Reading (STAR) and Adult Numeracy

Initiative (ANI) programming, integrated education and training development, as well as taking advantage of the extensive training opportunities through COABE, in OCTAE-supported ELL training and professional development resources available through LINCS. Other continuing topics for professional development include but are not limited to integrating academic and occupational instruction, transitioning students into career pathway credentials, contextualizing GED instruction, integrating high school equivalency instruction with postsecondary occupational instruction, integrating employability and digital literacy skills into the Adult Education curriculum, developing integrated cross-title programming, supporting re-entry of justice-involved individuals into adult education and occupational training programs, developing better access to financial aid resources for adult education students, ELL work focusing on integrating academic language, critical thinking, and language strategies into ELL instruction, integrating digital literacy Into ELL instruction, connecting adult ELL learners to regional high-growth career pathways through contextualization, developing and deploying online instruction for all adult education learners, utilizing NRS-approved assessments, etc.

**C):** WTCS delivers technical assistance to enhance program effectiveness, assist providers in meeting established performance standards, and fulfill obligations associated with being a WIOA partner and local one-stop partner. A variety of modalities are used to deliver and support professional development and technical assistance. Professional development has been though a blend of face-to-face state, regional and local conferences as well as through online means. Utilizing various methods including virtual technologies, Title II providers have access to a state and national resources accessible through national, WTCS, Wisconsin Literacy, and Wisconsin WIOA program and training sites. WTCS continues to utilize the online WIDS curriculum repository for storing and making available statewide curriculum resources as well as best practice teaching/learning materials.

Technical assistance topics typically include training and development for staff in:

- 
- Understanding monitoring tools, program reporting, and accountability to reach AEFLA goals
- Analyzing NRS data to inform local program improvement
- Ensuring data and other related reporting procedures
- Understanding various adult high school credentialing options
- Recognizing and meeting the expectations of being a One-Stop partner
- Options for offering quality Integrated Education and Training
- Updating and utilizing ABE & ELL curriculum standards
- Developing transitional programs that increase students' ability to receive financial aid
- Analyzing data to improve equitable outcomes for students
- Provide education and training services in concurrent ways across WIOA titles to ensure a true "One-stop" experience for participants

**D)** Program review is an opportunity for WTCS Office staff and Wisconsin AEFLA program staff to examine the program's design, effectiveness, performance, and compliance with state and

federal guidelines. The process also provides an opportunity for AEFLA programs to receive technical assistance from the WTCS Office to strengthen the program.

The AEFLA program review process is coordinated annually by the WTCS Office and includes virtual and on-site program review with selected Wisconsin AEFLA programs. Various aspects of the AEFLA program will be reviewed by the WTCS Office team. Below is a list of areas that may be reviewed. Each area reviewed will be assessed to determine if it meets state and federal compliance.

- Program planning and staff management
- Student recruitment and retention
- Student intake, documentation, and policy
- Instruction
- Instructional resources and technology
- Data processes, reporting, and improvement
- Financial management
- Professional development
- External program coordination
- Facilities
- Student accommodations

Wisconsin AEFLA programs will engage in discussion with WTCS Office staff in these areas and be asked to provide supporting evidence to demonstrate successful program implementation that complies with state and federal guidelines and promotes successful outcomes for all populations served within the program.

The AEFLA program review process is a continuous cycle comprised of four core activities that are coordinated on an annual basis by the WTCS Office.

1. ***Program Risk Assessment*** activities are conducted each October. A series of indicators are used to assign a score from 0 to 100 that is used to inform the identification of providers for virtual or on-site program review. Examples of risk indicators include changes in key program personnel and not meeting Measurable Skill Gains expected level of performance goals.
2. ***Pre-Program Review*** activities begin in November each year and is informed by the results of program risk assessment activities. During pre-program review, WTCS Office staff coordinate program review expectations and logistics with AEFLA Program Administrators. Wisconsin AEFLA Program Administrators are also required to complete a Pre-Program Review Assessment and share the results with WTCS Office staff to demonstrate compliance with state and federal guidelines.
3. ***Program Review*** incorporates a series of collaborative activities to include AEFLA program staff discussions and instructor and student interviews lead by WTCS Office staff. On-site program review also includes instructional site observation. WTCS Office

staff and the AEFLA Program Administrator will complete the Program Review Assessment during this step of the program review process.

4. ***Post-Program Review*** activities begin within 15 days of program review activities. WTCS Office staff will finalize a summary report of the program review activities to include commendations for exceptional outcomes and required actions to ensure compliance with state and federal guidelines. Wisconsin AEFLA programs requiring corrective action are required to develop and implement a continuous improvement plan. Once finalized, WTCS Office staff monitor continuous improvement plan implementation to ensure success and to provide technical assistance as needed.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

Wisconsin's Title II providers receive ongoing leadership and professional development opportunities through the WTCS Adult Education team. This support includes technical assistance, monthly calls and quarterly meetings and trainings that focus on topics that can include:

- aligning adult education with other WIOA core programs, One-Stop partners and workforce;
- the establishment or operation of professional development to improve instruction by local providers;
- the dissemination of information and promising practices related to instruction, literacy, adult education and IET programs;
- technical assistance, including the development and dissemination of instructional practices and assistance in the use of instructional/distance technology;
- the monitoring and evaluation of adult education activities and identification of promising practices within the state.

F. ASSESSING QUALITY

**Awarded Provider Performance, Continuous Improvement, and Assessing Quality**

WTCS staff offer ongoing assessment and offerings for professional development and technical assistance to AEFLA funded providers. These efforts include both internal leadership and support and utilization of leadership funds to bring subject matter experts, faculty and curriculum expertise, and ensure ongoing cross-state collaboration with literacy groups, CBOs, and WIOA workforce partners.

In support of reaching the statewide WIOA performance indicator negotiated levels of performance, the WTCS has developed and implemented the AEFLA Program Effectiveness Model. Under this model, each WTCS awarded provider is held accountable to localized expected levels of performance. Awarded provider expected levels of performance are set on an annual basis and are aligned with the WIOA performance indicators that the WTCS has negotiated with the US Department of Education. To meet an expected level of performance target, awarded providers must attain an achievement rate of 90% or greater in relation to their identified expected level of performance for each WIOA indicator. Awarded providers that fail to meet the 90% achievement rate receive technical assistance from the WTCS in the first year and are required to develop and share with the WTCS a local improvement strategy. Within the local improvement strategy, awarded providers are asked to:

- Identify the WIOA performance indicator(s) that fails to meet the 90% achievement rate;
- Identify and provide data to substantiate factors believed to be contributing to failing to meet the 90% achievement rate e.g. lower performance at certain service locations, lower performance among certain student groups, etc.;
- Identify specific actions the awarded provider will take to address the challenge; and
- Document how AEFLA funding will support improvements to increase performance.

The WTCS monitors awarded providers implementing local improvement strategies through quarterly meetings to discuss progress and challenges to implementing the local improvement strategy. In addition to the AEFLA Program Effectiveness Model, awarded providers must also participate in WTCS Program Monitoring. This standardized process requires the fiscal agent to work with awarded providers to reflect upon and create plans for improvement in the following program areas:

1. Intake process, skills assessment, & related program onboarding processes;
2. Staff Qualifications & Staff Professional Development;
3. Internal/external coordination, outreach, & planning;
4. Advancing learners towards their goals;
5. High quality instruction and services;
6. Information management – dashboards, system usage, reporting, and continuous improvement plans; and
7. Target professional development planning for that specific program for the current year, and 2) to guide system-office-directed requests for modifications to the next year's AEFLA grant application, specifying outcomes, activities, and resources that address the quality issues. These findings are also synthesized across the WTCS and findings are used to inform future WTCS-coordinated professional development offerings.

WTCS has also developed an overall awarded provider evaluation model to inform technical assistance intervention and to assess the quality of AEFLA awarded providers. This model incorporates a series of performance indicators to assess overall awarded providers' success in meeting WIOA, AEFLA, and award outcomes and is reviewed at the end of each program year. Areas of quality assessment include:

- Participants served to participants projected in the provider's approved award;
- Participant testing in relation to the WTCS pre-/post-test rate goal;
- Meeting WIOA performance indicator expected levels of performance;
- Provider award spend down rates;
- Award dollars reimburse per Measurable Skill Gain; and
- Data quality measures such as Integrated Education and Training reporting.

Awarded providers are assigned an overall measure across these areas prioritizing which intervention in technical assistance will support the programs' continuous improvement. Areas

of WTCS technical assistance include, but are not limited to, delivering and designing of effective instruction, data reporting, understanding WIOA performance measures, and administering assessments.

In addition to utilizing the Program Effectiveness Review Model to deliver professional development that ensure quality in performance, the Program Review which includes a four-stage process -- Program Risk Assessment, a Pre-Program Review, a Program Review and a Post-Program Review, also offers insight into the programs' needs. Measures such as 1) the current status of program staff training on key aspects of adult education as well as AEFLA/WIOA compliance, and 2) turnover in local program staffing are specific elements that are included in this Program Review. This review process provides local information and data that also assists in identifying opportunities for professional development and technical assistance. Within 30 days of the program's review, WTCS staff provide a summary report of the local program's strengths and any identified corrective/required actions to ensure compliance with state expectations and federal guidelines. Corrective action can often include a need for development or technical assistance to strengthen the program's delivery and accountability.

There is an additional follow up within 60 days to ensure that the identified actions and planning are underway, with ongoing monitoring for improvement, including student performance data. Results from annual reviews lead to 1) professional development planning for specific programs for the current year, and 2) WTCS guidance for modifications to the next year's AEFLA grant application, specifying outcomes and activities (including related to professional development) that address the quality issues. Trends identified through a series of local program reviews will also be used to inform future WTCS-coordinated professional development offerings.

In addition to gathering detailed information on needed professional development and technical assistance, the WTCS AEFLA team utilizes:

- Triannual reports submitted by each funded program - These reports provide detail regarding each programs' progress toward achieving projected grant activities and outcomes. Feedback is provided after each triannual review, with staff also sharing comments and recommendations to programs regarding PD/training needed to improve performance.
- Local Program Self-assessment – WTCS staff work with each programs' faculty/staff as their self-study identifies performance and programmatic issues, and uses the study to advise and provide the program with appropriate faculty/staff training, operational adjustments and other continuous improvement strategies.
- Face-to-face and online surveys – These ongoing assessments (formal and informal) are used regularly to engage program leadership regarding their professional development and technical assistance needs.

Finally, the WTCS staff gather input regarding the needs for local program professional development and technical assistance needs as it 1) analyzes professional development needs for any new provider, 2) analyzes reports of professional development strategies in the AEFLA local plans required of grantees, and 3) partners with the WTCS's Faculty Quality Assurance System, which ensure the state's legislative requirements for all faculty, includes the same competencies and professional development for AEFLA adult education faculty. More information about these competencies, ongoing development of occupational experience, mentoring, and faculty evaluation can be found at: https://wtcsystem.edu/about-us/governance/system-office/educational-services/student-success/faculty-quality-assurance

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

| The State Plan must include | Include |
|---|---|
| 1. The plan is submitted by the State agency that is eligible to submit the plan; | Yes |
| 2. The State agency has authority under State law to perform the functions of the State under the program; | Yes |
| 3. The State legally may carry out each provision of the plan; | Yes |
| 4. All provisions of the plan are consistent with State law; | Yes |
| 5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan; | Yes |
| 6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan; | Yes |
| 7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and | Yes |
| 8. The plan is the basis for State operation and administration of the program; | Yes |

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

| The State Plan must include | Include |
|---|---|
| 1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement); | Yes |
| 2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA; | Yes |
| 3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA; | Yes |
| 4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. | Yes |
| 5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303). | Yes |

AUTHORIZING OR CERTIFYING REPRESENTATIVE

| APPLICANT'S ORGANIZATION | Enter information in this column |
|---|---|
| Applicant's Organization | Wisconsin Technical College System |
| **PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE** | **Enter information in this column** |
| First Name | Morna |
| Last Name | Foy |
| Title | President |
| Email | morna.foy@wtcsystem.edu |

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

The Wisconsin Technical College System (WTCS) receives Title II funding from the U.S. Department of Education's Office of Career, Technical & Adult Education (OCTAE), and grants these funds out to eligible providers through a competitive grant process, per WIOA Section 231(a). Wisconsin's eligible institutions, colleges and community-based organizations ensure equal opportunities to participate for all eligible students, teachers, and other program beneficiaries in any project and/or activity carried out under the applicable program, such as adult basic education, and promotes the ability of such students, teachers, and beneficiaries to meet high standards.

**COMPETITION EQUITY**

WTCS holds an open competition and requires local providers to provide assurances that they will fully implement the requirements and activities authorized under section 427 of the General Education Provisions Act (GEPA). WTCS ensures that all grant competition announcements, information and training is available to potential providers/grantees in an open, transparent and equitable manner. The funds are made available through a competitive application process, and the grant announcements will are disseminated to current providers and the public utilizing the same time, date and format of announcement. The grant opportunities are typically posted on the agency's website, shared through regional media, and posted on the state's VendorNet informational website. All eligible providers have equitable opportunity to pose questions and receive answers in a public forum that is shared with the general public. All grantee applications are evaluated using the same scoring criteria which aligns with the directions contained in this Plan and the 13 considerations required by federal WIOA legislation. Additionally, statewide geographical distribution of funds is utilized to ensure that all Wisconsin citizens can access local adult education and literacy programming, with providers asked to ensure that services are offered, when possible, at varying times and days and through alternative delivery methods including distance delivery. These grants will be awarded on a four-year basis, with updated applications due each year.

The competition review panel is composed of individuals selected for their experience in the fields of adult and postsecondary education, training and workforce development. This panel is trained by the WTCS Grants Management team prior to the review and scoring of applications, which are based on the criteria in the Applications Scoring Rubric. Applications are first reviewed to determine if the applicant meets the definition of "eligible provider of demonstrated effectiveness". If they do not meet this standard, the application is not to be

scored. Additionally, as required under WIOA, representatives from each of Wisconsin's local Workforce Development Boards (WDB) have the opportunity to review the applications to encourage consistency and alignment with the strategic goals and objectives in Wisconsin's WIOA local plans. The WDB submits comments with WTCS, which are also considered in the application review process.

WTCS ensures equitable access to, and participation in, all projects and activities as required under WIOA, Perkins and other federal education funds. Providers and programs utilizing these funds identify and address the needs of students, faculty and other program beneficiaries to overcome barriers to programming and participation, including but not limited to barriers of gender, race, color, national origin, disability, and age. WTCS provides various learning and professional development opportunities to WTCS employees as well as providers, which includes providing accommodations for individuals with disabilities. WTCS ensures that all education and training providers give equal and equitable access to all programs, projects and activities through ongoing monitoring and technical assistance processes and follows the laws under the Equal Opportunity Hiring Act and the Americans with Disabilities Act.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Employment (Second Quarter After Exit) | 50.0% | 49.0% | 50.5% | 49.5% |
| Employment (Fourth Quarter After Exit) | 47.0% | 46.5% | 47.5% | 47.0% |
| Median Earnings (Second Quarter After Exit) | $5,100 | $5,052 | $5,100 | $5,053 |
| Credential Attainment Rate | 35.0% | 33.0% | 50.0% | 33.0% |
| Measurable Skill Gains | 53.0% | 53.0% | 54.0% | 53.0% |
| Effectiveness in Serving Employers | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] |

*1*

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

### A. INPUT OF STATE REHABILITATION COUNCIL

#### 1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

1. **Develop each current DVR Goal/Priority into Specific, Measurable, Achievable, Realistic, and Timely (SMART) goals with a quantifiable outcome or "resulting in X" statement.**

DVR's State Goal, identified in section (l) of this document, is to *meet or exceed performance goals defined by the Rehabilitation Services Administration (RSA) and outcome goals of the Wisconsin Competitive Integrated Employment (CIE) Report by aligning agency activities to the nine priorities identified* in section (l).

DVR will be negotiating Program Year (PY)20 performance measure goals with RSA in PY19, and quantifiable goals will be outlined in the CIE Report. The Workforce Innovation and Opportunities Act (WIOA) requires most program reporting on a program year basis; July 1 to June 30.

In addition, as a result of this recommendation, DVR will report to Wisconsin Rehabilitation Council (WRC) annually as part of the Administrative update at quarterly meetings, on activities performed and progress made on the nine priorities.

1. **Perform an in-depth review of the DVR process and timeliness of service provision. This should be completed and reported by service type (job development vs. supported employment vs. student-based work services vs. individualized placement & support vs. customized employment).**

DVR recognizes that service provider capacity is one component of timely service provision. DVR is reviewing all current technical specifications and using state/national information to inform change. The Service Provider Advisory Group was established in 2018 and is assisting in this review of technical specifications and making recommendations on changes to address and analyze the needs of service providers. Statewide rates, timing of payments, reporting requirements, and incentivized payments are all under review. Wisconsin's statewide service providers and other state VR Agencies have been surveyed as part of this review. Outcomes of this review will be implemented by the next state fiscal year beginning July 1, 2020.

DVR consistently meets goals set by RSA regarding timeliness of eligibility determination and Individualized Plan for Employment (IPE) development. The IPE is a written plan outlining an individual's vocational goal and the services to be provided to the goal. DVR collects data on both eligibility and IPE development timeliness and not only reports the results to RSA but also displays it on the DVR Dashboard for staff and management viewing. DVR will consider the recommendation to report service timeliness by type of service received going forward based on data collection and reporting capabilities.

1. **Collaborate with all interested stakeholders including DVR staff, job seekers, service providers, long term care (LTC) funders, and advocacy groups by way of an unaffiliated, unbiased process improvement expert to prepare specific strategies regarding:**

- **A draft fee schedule based on true cost of services as incurred by providers**
- **Streamlined reporting models, methods, and means**
- **DVR staffing consistencies between WDA service regions**

- **Timely and consistent communication and interaction with Service Providers/vendors**

DVR agrees with this recommendation and began several efforts in PY18 and PY19 to address these areas and will continue through PY20. Most of the efforts are described in the response to Recommendation 2. DVR is also working collaboratively with the Wisconsin Departments of Public Instruction (DPI) and Health Services (DHS) through the State Competitive Integrated Employment (CIE) Workgroup to jointly address service provider capacity issues and concerns across the state. The 2017 Wisconsin Act 178 requires DVR, DHS, and DPI to collaborate, with the input of stakeholders, to establish and share performance improvement targets to ensure that programs, policies, and procedures statewide support CIE outcomes for youth and adults with disabilities in Wisconsin. DVR is the lead agency and has hired a project manager to lead the CIE Team.

1. **Prioritize creation of an Interagency Service Provider Quality Standards Workgroup to work in tandem with the existing Interagency Service Provider Capacity Workgroup to identify:**

- **Core Competencies for all DVR service providers such as required through Credentialed Certified Employment Support Professionals (CESP)**
- **Potential targeted training opportunities by vendor type, location, population, etc.**
- **Incentivized Payment Structures based on provider performance**

DVR agrees with this recommendation. This is an effort that DVR, along with the Interagency Service Provider Capacity Workgroup and Service Provider Advisory Group, will be addressing.

1. **Enhance training requirements for Business Service Consultants (BSC) to include in-depth knowledge of underserved populations and job seekers with the most significant disabilities so BSCs understand the needs of these populations when reaching out to business for employment opportunities.**

DVR appreciates this feedback and will continue to provide these training resources to BSCs as well as all DVR staff. DVR recently provided mandatory training on cultural competencies for underserved populations as identified in the Comprehensive Statewide Needs Assessment (CSNA). The training was mandatory for all DVR staff. DVR is looking for disability training opportunities for staff, which will be included in future training budgets. BSCs are encouraged to participate in all DVR sponsored training.

1. **Strengthen the collaboration between DVR Business Service Consultants (BSCs) and local communities/businesses by supporting and funding participation in localized and statewide organizations such as Chamber of Commerce, Society for Human Resource Management (SHRM), Small Business Administration (SBA), Business Network International (BNI), and other relevant industry and trade associations.**

DVR agrees with this recommendation and supports BSCs in joining SHRMs, Chambers of Commerce, and other associations as needed and will continue to do so. DVR cannot support any lobbying activities that the associations may be a part of.

1. **With guidance and assistance from all interested stakeholders, continue to explore the identification and support the implementation of additional evidence-based programming for DVR job seekers.**

DVR agrees with this recommendation and will continue to seek evidence-based programming that will assist DVR job seekers. As part of the CIE workgroup, the project manager is looking at possible evidence-based practices to bring to the group for consideration. DVR welcomes recommendations from stakeholders as well as WRC members as they become aware of new practices.

1. **Collaborate and coordinate with all interested stakeholders and partners to develop innovative and creative approaches to reducing transportation barriers for job seekers. Engage VR agencies from outside of Wisconsin for ideas to address transportation obstacles in urban, suburban, and rural populations in all disability categories.**

DVR agrees with this recommendation as transportation is one of the largest barriers for DVR consumers (and other job seekers) across the state and nation. DVR recognizes that this is an effort that DVR cannot address alone. We look forward to WRC's partnership on this effort along with other stakeholders and Agencies to begin to identify needs and possible approaches. The CIE workgroup has identified this as an issue to address as part of its CIE Plan.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

See Section a. 1.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

See Section a. 1.

B. REQUEST FOR WAIVER OF STATEWIDENESS

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

Wisconsin is not requesting a waiver.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Wisconsin is not requesting a waiver.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Wisconsin is not requesting a waiver.

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

DVR has developed Memorandums of Agreement (MOAs) and Memorandums of Understanding (MOUs) with agencies and programs at the federal, state, and local levels that outline DVR's

cooperation with and utilization of agency and program services where common customers are served. DVR keeps a current listing of these agreements on the public-facing DVR webpage. The agreements outline how services and funds will be coordinated to meet the goals of DVR consumers who may be served by comparable benefits. Apart from formal lease agreements for DVR office space, DVR does not have any agreements that govern the utilization of facilities.

At the federal level, DVR has developed an MOU with the Veterans Administration and cooperative agreements with two federally recognized tribes in Wisconsin that receive American Indian Vocational Rehabilitation (AIVR) grants from the Rehabilitation Services Administration. The agreements include specific logistical agreements for processing interagency referrals, coordinating services and expenditures, cross training, and resolving disputes. Additionally, DVR has cooperative agreements with a tribal college and the Great Lakes Inter-Tribal Council, each of which also receive grants from AIVR.

At the state agency level, DVR has several agreements which govern cooperation with and use of agency and program services. The agreements include specific logistical agreements for processing interagency referrals, coordinating services and expenditures, cross training, and resolving disputes. These partners at the state level include the Client Assistance Program, the Wisconsin Department of Children and Families (the agency that administers TANF), Wisconsin's Independent Living Council, the University of Wisconsin, and the Wisconsin Technical College system. DVR is also included in a departmental agreement with the Wisconsin Department of Corrections. Details related to agreements with Wisconsin's Education and Medicaid agencies can be found in sections D and H.

DVR offices at the local level typically do not have formal cooperative agreements. Agreements made at the state level are intended to govern day to day operations in the local offices.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

DVR is active in the administration of the Assistive Technology State Plan. DVR is a member of the State Assistive Technology (AT) Advisory Council. The role of the council is "to provide consumer-responsive, consumer-driven advice to the State for planning, implementation, and evaluation of the activities carried out through the grant, including setting the measurable goals."

Wisconsin’s AT Advisory Council provides advice and guidance on the following:

- Wisconsin’s State Plan for Assistive Technology;
- WisTech loan program support and evaluation;
- Monitoring of program data and outcomes; and
- Developing and maintaining AT partnerships.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

In Wisconsin, the program identified to assist people with disabilities in farming is the Easterseals AgrAbility program. DVR uses AgrAbility's services to provide assessments and recommendations for self-employment if a DVR consumer identifies self-employment as an IPE

goal and owns a farm business. DVR also partners with AgrAbility to provide training for youth and students interested in employment in the agricultural sector.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

DVR has agreements with the Oneida Nation and the College of Menominee Nation to receive Section 166 grant (Title I) services, which include services to youth. DVR also has local referral arrangements with agencies that serve foster care youth and social service agencies that serve youth no longer in school.

5. STATE USE CONTRACTING PROGRAMS.

DVR has no formal agreement with the Wisconsin State Use Program outlining cooperation with or utilization of services and facilities.

D. COORDINATION WITH EDUCATION OFFICIALS

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

**Interagency Agreement with the Wisconsin Department of Public Instruction (DPI)**
https://dwd.wisconsin.gov/dvr/service_providers/interagency_agreements/dpi_iaa.pdf

DVR has an interagency agreement with DPI as required by WIOA to facilitate the transition of students with disabilities from school to employment. The agreement was developed to ensure that DVR and DPI are meeting all federal standards in WIOA and IDEA to transition students with disabilities. The agreement was originally signed in June of 2014, then updated and re-signed in CY 2018 to include all WIOA 34 CFR 397 (511) requirements, including information on subminimum wage employment for youth with disabilities. The agreement also outlines the financial responsibility of DVR and Local Education Agencies (LEAs) when providing transition services to students.

DVR's role in transition at both the systemic and service delivery levels are identified in the interagency agreement. The agreement facilitates the development of a coordinated service plan in support of the student's long-term employment and independent living goals.

**Interagency Agreement with DPI, DVR, and the Wisconsin Department of Health Services (DHS)**

https://dwd.wisconsin.gov/dvr/pdf_files/dpi_interagency_agreement.pdf

DVR has an Interagency Agreement that defines necessary relationships, policies, and procedures between DVR, DPI, and DHS. The agreement is designed to create common understanding and establish collaborative efforts for services to improve employment outcomes for students with disabilities who may be eligible for DVR services. This interagency agreement has been revised since the original agreement in July 2007 to shift focus to both students with disabilities transitioning from high school and adults with disabilities who have an expectation for competitive integrated employment (CIE). As of the writing of the State Plan, revisions to this agreement are in the final stages of approval between DVR, DHS, and DPI, and are expected to be signed by the end of CY 2019. The revised agreement will stay in place until it is replaced by a new agreement.

This agreement between DPI, DVR, and DHS has four overarching priorities supporting CIE:

1. To comply with federal legal mandates under the Rehabilitation Act of 1973, as amended by WIOA and IDEA of 2004.
2. To provide practical guidance, technical assistance, and training to internal and external stakeholders and staff regarding employment-related services and supports.
3. To provide information on employment services to individuals with disabilities and their family members or guardians to allow full participation in employment.
4. To provide clarification of roles of stakeholders within each Department regarding individuals with disabilities who have identified support needs associated with employment and independent living, so that individuals with disabilities and their families may experience these supports as seamless, non-duplicative, and transparent.

**Transition Action Guide (TAG)**

https://dwd.wisconsin.gov/dvr/pdf_files/tag.pdf

DVR, DHS, and DPI jointly developed a Transition Action Guide (TAG) that puts the interagency agreement into practice. The agreement and TAG have been modified to reflect best practices associated with increasing employment opportunities for people with cognitive or physical disabilities who also have challenges with mental health. The agreement and TAG are published on DVR's public website. The three agencies are working toward updating these agreements to reflect ongoing projects that have enriched and deepened our relationship, mutual understanding, and program evolution.

The updated agreements provide an ongoing information source that best reflects the updated procedures, polices, and protocols established to serve Wisconsin youth eligible for DVR services.

**Pre-ETS Policy Guide**

https://dwd.wisconsin.gov/dwd/publications/dvr/pdf/dvr_18333_p.pdf

DVR's Pre-Employment Transition services policy serves as guidance to DVR staff and describes statewide service delivery to students and youth with disabilities, specifically Pre-Employment Transition services, limitations on the use of subminimum wage employment (Section 511), and potentially eligible students as defined by WIOA.

WIOA requires DVR, in collaboration with LEAs, to offer Pre-Employment Transition services to all students with disabilities (ages 14 to 21) in high school or a postsecondary training program. DVR is required to set aside 15% of annual federal grant allocation to provide Pre-Employment Transition services.

Pre-Employment Transition services include:

- Job exploration counseling
- Work-based learning experiences (after school work opportunities outside the traditional school setting including internships that are provided in an integrated environment)

- Counseling on opportunities for enrollment in comprehensive transition or enrollment in postsecondary educational programs
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy or peer mentoring

As a requirement of WIOA, DVR has met their 15% requirement since FFY 2015. Each DVR Workforce Development Area (WDA) is given an expenditure target and then develops a plan to reach their individual goal.

As part of these plans, each WDA develops a strong relationship with local school districts and Workforce Development Boards (WDBs). Summer work experiences, workplace readiness training to develop social and independent living skills, and other work-based learning experiences have been implemented and will continue to expand as the population of high school students we serve increases.

Transition in Wisconsin starts at age 14. Students with disabilities are recommended to apply for DVR services at least two years before high school graduation. The student's Individualized Plan for Employment (IPE) should be developed as soon as possible, not to exceed 90 days after DVR eligibility is determined. DVR staff use rapid engagement and motivational interviewing techniques when working with this population.

DVR, in collaboration with the local education agency, will provide Pre-ETS to assist the student in developing and successfully achieving their IPE goal.

Statewide, DVR has designated high school transition staff to provide leadership, information and referral, advocacy, and technical assistance, and to promote collaboration among consumers, parents, adult service providers, and other service agencies. Designated DVR transition staff includes a Statewide Coordinator and the Statewide Transition Action and Resource Team (START).

START includes a DVR representative from each WDA. START members are responsible for sharing transition-related policy and practices with staff in their WDAs. This responsibility also includes coordinating activities and training other DVR staff. DVR staff also participate in various local County Communities on Transition (CCoT) and statewide transition initiatives.

To facilitate the transition of students with disabilities from school to DVR employment services, DVR will:

- Continue to assign counselors to each public high school in the state. The assigned liaison counselors will provide outreach, technical assistance, information and referral to secondary education officials in their assigned schools, attend Individualized Educational Plan (IEP) meetings when invited to ensure a consistent employment goal in the IPE, and that direct services are provided to all eligible and potentially eligible students.
- Ensure that the consumer's IPE is coordinated with the employment goal included in the school's IEP, and, where appropriate, the individualized service plans of long-term care service providers. The assigned DVR liaison also attends parent teacher conference nights and resource fairs at their local school.
- Participate in the Wisconsin Community of Practice on Transition, which focuses on interagency collaboration to improve outcomes for students with disabilities.

- Engage students in activities that allow IPE development within 90 days of eligibility determination in coordination with the student's school before the student leaves high school.
- Maintain the interagency agreement with DPI and DHS (Wisconsin's Medicaid agency). DVR uses this agreement as the official guiding document in coordination of transition activities for students with disabilities as they move from school to postsecondary education or employment.
- Promote the use of the TAG as included in the interagency agreement between DHS, DVR, and DPI to define roles for DVR and the LEA during IEP development. The TAG details and supports interagency coordination processes and procedures to deploy needed supports and activities for DVR-eligible students to successfully transition from school to postsecondary education or employment. It also includes policy information, definitions, timelines, and evidence-based examples of best practices.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

**Interagency Agreement with the Wisconsin Department of Public Instruction (DPI)**
https://dwd.wisconsin.gov/dvr/partners/agreements/dpi_iaa.pdf

DVR has an interagency agreement with DPI as required by WIOA to facilitate the transition of students with disabilities from school to employment. The agreement was developed to ensure that DVR and DPI are meeting all federal standards in WIOA and IDEA to transition students with disabilities. The agreement was originally signed in June of 2014, then updated and re-signed in CY 2018 to include all WIOA 34 CFR 397 (511) requirements, including information on subminimum wage employment for youth with disabilities. The agreement also outlines the financial responsibility of DVR and Local Education Agencies (LEAs) when providing transition services to students.

DVR's role in transition at both the systemic and service delivery levels are identified in the interagency agreement. The agreement facilitates the development of a coordinated service plan in support of the student's long-term employment and independent living goals.

**Interagency Agreement with DPI, DVR, and the Wisconsin Department of Health Services (DHS)**

https://dwd.wisconsin.gov/dvr/partners/agreements/dpi_interagency_agreement.pdf

DVR has an Interagency Agreement that defines necessary relationships, policies, and procedures between DVR, DPI, and DHS. The agreement is designed to create common understanding and establish collaborative efforts for services to improve employment outcomes for students with disabilities who may be eligible for DVR services. This interagency agreement has been revised since the original agreement in July 2007 to shift focus to both students with disabilities transitioning from high school and adults with disabilities who have an expectation for competitive integrated employment (CIE). As of the writing of the State Plan, revisions to this agreement are in the final stages of approval between DVR, DHS, and DPI, and are expected to be signed by the end of CY 2019. The revised agreement will stay in place until it is replaced by a new agreement.

This agreement between DPI, DVR, and DHS has four overarching priorities supporting CIE:

1. To comply with federal legal mandates under the Rehabilitation Act of 1973, as amended by WIOA and IDEA of 2004.
2. To provide practical guidance, technical assistance, and training to internal and external stakeholders and staff regarding employment-related services and supports.
3. To provide information on employment services to individuals with disabilities and their family members or guardians to allow full participation in employment.
4. To provide clarification of roles of stakeholders within each Department regarding individuals with disabilities who have identified support needs associated with employment and independent living, so that individuals with disabilities and their families may experience these supports as seamless, non-duplicative, and transparent.

**Transition Action Guide (TAG)**

https://dwd.wisconsin.gov/dvr/job-seekers/transition/tag.pdf

DVR, DHS, and DPI jointly developed a Transition Action Guide (TAG) that puts the interagency agreement into practice. The agreement and TAG have been modified to reflect best practices associated with increasing employment opportunities for people with cognitive or physical disabilities who also have challenges with mental health. The agreement and TAG are published on DVR's public website. The three agencies are working toward updating these agreements to reflect ongoing projects that have enriched and deepened our relationship, mutual understanding, and program evolution.

The updated agreements provide an ongoing information source that best reflects the updated procedures, polices, and protocols established to serve Wisconsin youth eligible for DVR services.

**Pre-ETS Policy Guide**

https://dwd.wisconsin.gov/dwd/publications/dvr/pdf/dvr_18333_p.pdf

DVR's Pre-Employment Transition Services policy serves as guidance to DVR staff and describes statewide service delivery to students and youth with disabilities, specifically Pre-Employment Transition Services, limitations on the use of subminimum wage employment (Section 511), and potentially eligible students as defined by WIOA.

WIOA requires DVR, in collaboration with LEAs, to offer Pre-Employment Transition Services to all students with disabilities (ages 14 to 21) in high school or a postsecondary training program. DVR is required to set aside 15% of annual federal grant allocation to provide Pre-Employment Transition Services.

Pre-Employment Transition Services include:

- Job exploration counseling
- Work-based learning experiences (after school work opportunities outside the traditional school setting including internships that are provided in an integrated environment)
- Counseling on opportunities for enrollment in comprehensive transition or enrollment in postsecondary educational programs

- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy or peer mentoring

WIOA, DVR has met their 15% requirement since FFY 2015. Each DVR Workforce Development Area (WDA) is given an expenditure target and then develops a plan to reach their individual goal.

As part of these plans, each WDA develops a strong relationship with local school districts and Workforce Development Boards (WDBs). Summer work experiences, workplace readiness training to develop social and independent living skills, and other work-based learning experiences have been implemented and will continue to expand as the population of high school students we serve increases.

Transition in Wisconsin starts at age 14. Students with disabilities are recommended to apply for DVR services at least two years before high school graduation. student's Individualized Plan for Employment (IPE) should be developed as soon as possible, not to exceed 90 days after DVR eligibility is determined. DVR staff use rapid engagement and motivational interviewing techniques when working with this population.

DVR, in collaboration with the local education agency, will provide Pre-Employment Transition Services to assist the student in developing and successfully achieving their IPE goal.

Statewide, DVR has designated high school transition staff to provide leadership, information and referral, advocacy, and technical assistance, and to promote collaboration among consumers, parents, adult service providers, and other service agencies. Designated DVR transition staff includes a Statewide Coordinator and the Statewide Transition Action and Resource Team (START).

START includes a DVR representative from each WDA. START members are responsible for sharing transition-related policy and practices with staff in their WDAs. This responsibility also includes coordinating activities and training other DVR staff. DVR staff also participate in various local County Communities on Transition (CCoT) and statewide transition initiatives.

To facilitate the transition of students with disabilities from school to DVR employment services, DVR will:

- Continue to assign counselors to each public high school in the state. The assigned liaison counselors will provide outreach, technical assistance, information and referral to secondary education officials in their assigned schools, attend Individualized Educational Plan (IEP) meetings when invited to ensure a consistent employment goal in the IPE, and that direct services are provided to all eligible and potentially eligible students.
- Ensure that the consumer's IPE is coordinated with the employment goal included in the school’s IEP, and, where appropriate, the individualized service plans of long-term care service providers. The assigned DVR liaison also attends parent teacher conference nights and resource fairs at their local school.
- Participate in the Wisconsin Community of Practice on Transition, which focuses on interagency collaboration to improve outcomes for students with disabilities.
- Engage students in activities that allow IPE development within 90 days of eligibility determination in coordination with the student's school before the student leaves high school.

- Maintain the interagency agreement with DPI and DHS (Wisconsin's Medicaid agency). DVR uses this agreement as the official guiding document in coordination of transition activities for students with disabilities as they move from school to postsecondary education or employment.
- Promote the use of the TAG as included in the interagency agreement between DHS, DVR, and DPI to define roles for DVR and the LEA during IEP development. The TAG details and supports interagency coordination processes and procedures to deploy needed supports and activities for DVR-eligible students to successfully transition from school to postsecondary education or employment. It also includes policy information, definitions, timelines, and evidence-based examples of best practices.

DVR has a statewide team of transition counselors who attend Statewide Transition Action Resource Team (START) meetings where resources and best practices are shared within DVR. DPI has the Transition Improvement Grant (TIG), which provides transition training and technical assistance to staff. START and TIG collaborate to share joint resources whenever possible.

Together, START and TIG have developed cross agency resources and trainings to provide technical assistance to DVR staff, special education staff from local high schools, and service providers who provide services funded through DVR and the local school district. Examples of these joint trainings include DVR 101 Transition Services, Motivational Interviewing, Person-centered Planning, Trauma Informed Care, Supported/Customized Employment, and Rural Transportation Solutions.

Statewide County Communities on Transition (CCoT) also meet to create relationships and improve transition services to students in their local communities. CCOTs are a vital mechanism to share transition best practices across the state. Each CCoT consists of individuals from local schools, DVR, service provider agencies, long-term support agencies, Aging and Disability Resources Centers (ADRCs), parents, and employers.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

A DVR counselor is assigned to each public high school in Wisconsin. These contacts can be found on DVR's Wisconsin School Liaison directory at https://dwd.wisconsin.gov/dvr/job-seekers/transition/school-liaisons.pdf.

The DVR counselor assigned to each school is responsible for connecting with the special education staff at each school to outreach to students with disabilities interested in Community Integrated Employment (CIE). They achieve this by setting up regular office hours in the school setting. DVR counselors also participate in job fairs, parent teacher conferences, and attend Individualized Education Program (IEP) meetings when invited.

DVR recommends that students are referred for DVR services two years before exiting high school. When a high school student is enrolled in DVR, their Individualized Plan for Employment (IPE) and IEP are complimentary to each other. DVR provides services both after school and during the summer. The goal is for both the IPE and IEP to include Pre-Employment Transition

Services provided by the school and DVR in a way that best promotes the success of the student through their transition from high school to post-secondary education or employment.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

See Section d. 2. A.

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

The interagency agreement between DVR and the Department of Public Instruction (DPI) discusses the process used when a consumer ages 14 to 24 is interested in subminimum wage employment. It also includes information about DVR and the LEA's responsibilities to provide Pre-Employment Transition Services to students with disabilities from age 14 to 21. Students identified for Pre-Employment Transition Services are covered under description d, sections 1, and 2.A. and includes students aged 14 to 21 who are in secondary or post-secondary education programs.

DVR's Pre-Employment Transition Services (Pre-ETS) Policy Guide includes this information and other details on how DVR provides Pre-Employment Transition Services, including the DVR staff requirement to document and code those services in the student's IPE.

The Transition Action Guide (TAG) is a requirement of the interagency agreement on transition between DVR, DPI, and the Department of Health Services (DHS) and contains operational details about how DVR and DPI serve the needs of students. It includes the process used when a student transitions from high school to post secondary education or employment. The TAG includes who is responsible for which service as the consumer moves through the process.

When there is an overlap in educational and employment/rehabilitation goals and services, cost sharing may be negotiated between DVR, the school district, and long-term care or mental health programs. To know who will pay for a service, all parties must be involved in transition planning to determine appropriate services.

The following are general guidelines to help understand how decisions can be made under the interagency agreement. Staff of all three potential funding sources (DVR, DPI, and DHS) are trained in the use of this decision-making process.

- Test 1: Will the service help to achieve the educational goal in the IEP? If yes, the school is primarily responsible for the service.
- Test 2: Will the service help to achieve the employment goal in the IPE? If yes, DVR is primarily responsible for the service.
- Test 3: If the same service appears in both the IEP and IPE, the school and DVR are responsible for negotiating a cost sharing arrangement. Conflicts between schools and DVR are resolved using the process outlined in the interagency agreement.
- Test 4: If the student is over age 18, eligible for Medicaid long-term care services and supports, and chooses to enroll in a Long-Term Care or Mental Health program, the three agencies are responsible for negotiating a cost sharing arrangement to determine appropriate resources for the individual’s situation. Conflicts between agencies are resolved using the process outlined in the interagency agreement.

DVR School Liaisons hold office hours within local high schools and provide information and materials about DVR to local special education staff to share with students. DVR staff also provide orientation information at local schools, attend IEP meetings when invited, and participate in parent teacher conference nights and transition fairs.

DVR counselors also attend local CCoT meetings to provide information on the DVR services available to Wisconsin students. Additionally, DVR staff offer training opportunities for local school districts to learn about DVR services at statewide training events including the Statewide Transition Academy and Employment First Conference.

DVR Counselors assigned to each public high school in Wisconsin have strong relationships with staff at the schools they serve to ensure seamless identification of students with disabilities interested in Competitive Integrated Employment (CIE). Students have the option to fill out a referral form to become a Potentially Eligible consumer with DVR, where they are able to receive only the five core Pre-Employment Transition Services, or they can apply to DVR to see if they are eligible to receive all DVR services necessary and appropriate to achieve their employment goal, including Pre-Employment Transition Services. Information that is shared during these outreach efforts include a description of the purpose of the VR program, eligibility requirements, application procedures and the scope of VR services that may be provided to eligible individuals.

DVR Counselors assigned to public high schools also provide information regarding DVR services at in-service/teacher trainings, local job fairs, parent teacher conferences, IEP meetings, statewide conferences (e.g., Employment First, Transition Academy, Self-Determination Conference, Transition Collaboration, and Statewide Transition Conference), and CCoT meetings.

The 2017 Wisconsin Act 178 CIE plan, published in July 2019, outlines DVR's responsibility to document the outreach efforts of DVR staff in providing information about DVR services to students, including those receiving SSI and SSDI benefits.

## E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Many of DVR's service providers are private non-profit organizations. DVR uses an outcome-based statewide fee structure with associated technical specifications for commonly used and available services.

The services most commonly purchased from non-profit vocational rehabilitation service providers include:

- Customized Employment
- Individual Placement and Support (IPS)
- Internship Temporary Work
- Job Preparation Development and Placement
- Student Work Based Learning Services
- Supported Employment
- Systematic Instruction
- Vocational Evaluation

- Work Incentive Benefits Analysis

Agencies wishing to provide these services complete a two-year service agreement with DVR. The statewide rates, technical specifications for the services, service provider agreement information, and a listing of providers that have a signed agreement with DVR are posted on the DVR public website at https://dwd.wisconsin.gov/dvr/service_providers/tech_specs/default.htm.

Other paid services with technical specifications provided by non-profit organizations include:

- Assistive Technology
- Job Shadow
- Skills to Pay the Bills
- Project SEARCH
- Walgreens Retail Employees with Disabilities Initiative (REDI)

Throughout the year, training and input meetings are held statewide with agencies and individuals providing services to DVR consumers. These DVR service provider meetings offer an opportunity for feedback and to review service agreement content for the next contract period. If an agency is interested in developing a project outside of statewide services, there is an established project submission process for review and consideration by the Bureau of Consumer services. Potential projects are reviewed for alignment with strategic and other priorities.

DVR Workforce Development Area (WDA) Directors and WDA staff coordinate regional meetings quarterly. DVR may also invite VR service providers to 'study hall' trainings or webinars as appropriate to provide clarifications or service updates.

The DVR service provider portal has also been enhanced to include a map that offers service demand and capacity information. The map and portal will continue to be improved during the next State Plan period and will ultimately allow service providers to access documents, billing information, and some consumer information directly from the password protected portal to assist in quality service delivery.

## F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

As part of WIOA, DVR has worked closely with the Wisconsin Department of Health Services (DHS) on a Memorandum of Agreement (MOA) describing how services will be provided to mutual consumers. The approved agreement includes information on definitions, mutual responsibilities, roles, technical assistance, conflict resolution, funding, confidentiality, data sharing, accountability, and reporting.

In response to 2017 Wisconsin Act 178, DVR, DHS, and the Wisconsin Department of Public Instruction (DPI) collaborated in the development of a joint plan, with the input of stakeholders, to increase This plan establishes performance improvement targets, describing specific

coordination methods to ensure programs, policies, and procedures support competitive integrated employment. DVR, DHS, and DPI will collaborate to update the plan at least biennially. This effort is a continuation of the long history of collaboration DVR has with these state agencies in serving individuals with the most significant disabilities in Wisconsin. This effective interagency collaboration is based on a shared vision, common goals, and mutual benefit for collaborative stakeholders and people with the most significant disabilities.

As part of 2017 Wisconsin Act 178, several specific workgroups have formed, including a workgroup to identify, recommend, and implement solutions to improve the capacity and quality of supported employment services in Wisconsin for youth and adults with the most significant disabilities. This group will also address improving the fee structures involved in providing supported employment services to ensure that fees cover applicable costs for agencies providing these services.

DVR will continue to work collaboratively with DHS to improve statewide supported employment resources. Efforts will focus on improving access to supported employment services and long-term employment supports, financial coordination of these services, and service provider quality and capacity. Another priority will be updating the adult Technical Assistance Guide.

In addition to these arrangements, DVR also has a collaborative relationship with the DHS Division of Care and Treatment Services which contracts with counties and other entities for mental health services including Individual Placement and Support (IPS) services for youth and adults via Medicaid waiver approved funds.

## G. COORDINATION WITH EMPLOYERS

### 1. VR SERVICES; AND

DVR has 11 Workforce Development Areas (WDAs) throughout Wisconsin which serve our business and consumer customers. In collaboration with our WIOA Title partners, DVR works to provide business services to Wisconsin's roughly 174,000 unique business establishments. These services serve the dual purpose of helping businesses meet their economic needs and increasing DVR consumer access to employment by providing training and technical assistance to employers regarding disability employment issues.

Wisconsin has chosen to use two of the three proposed Pilot Performance Measures to assess our effectiveness in serving employers:

- Employer Penetration Rate
- Repeat Business Customer

DVR's Business Services Policy Advisor informs our senior leadership team, Business Services Consultants (BSCs), and other DVR staff of national and regional trends and policies to consider in serving businesses. Additionally, this position coordinates and informs VR business initiatives at the national level, working with the National Employment Team (NET) and other agencies to keep DVR informed about state trends in private and public employment. The DVR Business Services Policy Advisor identifies business and industry sectors that have a multi-region, statewide, or national footprint, such as the energy sector, and serves on private and public committees to represent DVR.

DVR obtained nine permanent BSC positions in July 2016. In June 2019, DVR received approval to hire three more BSCs, which will allow DVR to increase services to businesses in

underrepresented regions throughout Wisconsin. DVR is in the process of recruiting and onboarding these positions through September 2019.

BSCs are embedded in field offices in each of DVR's 11 WDAs across the state to provide services to business regionally, coordinate business services with DVR's American Job Center Network partners, and provide technical assistance and resources to their DVR colleagues who work with consumers. BSC services to area businesses include providing technical assistance, ADA resources, hiring trends, and resources that educate employers DVR's pool of diverse workforce.

BSCs promote on-the-job training opportunities, or OJTs, with DVR staff, consumers, and contracted service providers. As a result of these efforts, 155 DVR consumers participated in OJTs in FFY 2018 and 81 participated in FFY 2019. The reduction in reported OJTs from FFY 2018 to 2019 was a result of both expanded employer reporting requirements to document Measurable Skills Gains (MSG) and an excellent economy in both fiscal years.

DVR BSCs, in collaboration with other DVR staff and service providers, work with businesses to promote the use of Internships/Temporary Work (I/TW) to assist consumers in developing new skills, work references, work adjustment, and occupational advancement. In Wisconsin DVR, work adjustment is experienced in an integrated setting through an individually selected internship/temporary work employer.

In PY 2017, 2,603 DVR consumers participated in I/TW, while 2,563 DVR consumers participated in I/TW in PY 2018. Wisconsin DVR is coordinating Place and Train programs in many areas of the state to gain permanent hires. This includes I/TW and OJT programs with the Walgreens REDI program and the Walgreens Distribution Center. Additionally, some Wisconsin regions have collaborated with local hospitality, tourism, and manufacturing industries to develop customized internship and training programs.

DVR BSCs and Policy Advisors are working to promote Youth and Adult Apprenticeships in Wisconsin. In PY 2018, Wisconsin DVR partnered with a local secondary school representative to record a webinar promoting the benefits of Youth Apprenticeship and demonstrated how to set one up. This webinar is used to expand awareness of youth and adult apprenticeships to help DVR participants gain self-supporting careers.

DVR's Business Services Policy Advisor and 12 BSCs document services they provide to business in Wisconsin's Database, called "Job Center of Wisconsin (JCW) Business" developed by WIOA Title III and used by WIOA partners since July 2017. In December 2017, JCW Business was designated as the official system of record for business services. WIOA Titles I, III, and IV all document services to business in JCW Business. This is one of many positive steps toward coordinated, team-based services for businesses both in Wisconsin and nationally.

WIOA Title partners, including DWD's Division of Employment and Training, participate in BSC training and share the importance of WIOA Titles working together to provide seamless access to business services. Business services teams are invited to share successful individual strategies, experiences, and outcomes with other regions and statewide to promote best practices. BSCs across the state have close working relationships with WIOA Title I and III business services staff in their area.

BSCs help facilitate Pre-Employment Transition Services by presenting at regional transition team meetings and statewide transition conferences on a variety of topics including best practices in providing outreach to business, sector strategies, and emerging business and economic trends.

BSCs make business connections when providing their services, especially direct services like recruitment assistance. When performing business outreach, BSCs encourage businesses to provide students meaningful job shadows, paid work experiences, and on-the-job training experiences. Additionally, BSCs provide training on local labor market trends to assist VR counselors and their consumers in employment planning.

Lastly, BSCs play an integral role in assisting students and youth with disabilities in obtaining high quality employment by participating as members of steering committees for several of Wisconsin's 27 active Project SEARCH sites. In addition to participating, BSCs recommend and recruit area business leaders to be part of Project SEARCH steering committees.

As of the 2017-18 school year, 85 percent of Wisconsin Project SEARCH graduates were employed within three months of completing the program, 12 percentage points higher the national average for Project SEARCH programs. BSCs play an active role in this process by promoting Project SEARCH graduates to area businesses as well-trained candidates for employment.

In the future, DVR will increase the role of BSCs in working with students. Examples of activities may include BSCs regularly presenting at high school events on employment-related topics, including career planning, career pathways, workforce pipelines, or what to wear to an interview.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

BSCs help facilitate Pre-Employment Transition services by presenting at regional transition team meetings and statewide transition conferences on a variety of topics including best practices in providing outreach to business, sector strategies, and emerging business and economic trends.

BSCs make business connections when providing their services, especially direct services like recruitment assistance. When performing business outreach, BSCs encourage businesses to provide students meaningful job shadows, paid work experiences, and on-the-job training experiences. Additionally, BSCs provide training on local labor market trends to assist VR counselors and their consumers in employment planning.

Lastly, BSCs play an integral role in assisting students and youth with disabilities in obtaining high quality employment by participating as members of steering committees for several of Wisconsin's 27 active Project SEARCH sites. In addition to participating, BSCs recommend and recruit area business leaders to be part of Project SEARCH steering committees.

As of the 2017-18 school year, 85 percent of Wisconsin Project SEARCH graduates were employed within three months of completing the program, 12 percentage points higher the national average for Project SEARCH programs. BSCs play an active role in this process by promoting Project SEARCH graduates to area businesses as well-trained candidates for employment.

In the future, DVR will increase the role of BSCs in working with students. Examples of activities may include BSCs regularly presenting at high school events on employment-related topics, including career planning, career pathways, workforce pipelines, or what to wear to an interview.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

In Wisconsin, the Wisconsin Department of Health Services (DHS) is the state Medicaid agency responsible for providing long-term support services to children and adults with physical and developmental or intellectual disabilities. DHS is also the state agency responsible for providing mental health services to children and adults.

***Act 178 Increasing Competitive Integrated Employment Outcomes***

2017 Wisconsin Act 178 requires the Wisconsin Department of Workforce Development's Division of Vocational Rehabilitation (DVR), the Wisconsin Department of Health Services (DHS), and the Wisconsin Department of Public Instruction (DPI) to collaborate, with the input of stakeholders, in the development of a joint plan to increase Competitive Integrated Employment (CIE) in Wisconsin.

The CIE Joint Plan establishes DVR, DHS, and DPI performance improvement targets, describing the specific coordination methods that will ensure programs, policies, and procedures statewide support CIE outcomes for youth and adults with disabilities in Wisconsin. The plan also requires the Departments to share best practices and success stories in serving students and youth with disabilities and post them on the CIE website, found at https://dwd.wisconsin.gov/dvr/cie/. The plan includes Department achievements in State Fiscal Year (SFY) 2019, which spans July 1, 2018 through June 30, 2019.

The CIE report was written using baseline data before implementation of the CIE plan. It includes information that relates to working-age individuals with disabilities who have Individualized Educational Programs (IEPs) with DPI or are receiving services through DHS long-term care (LTC) programs for adults, DHS Children's Long-Term Support (CLTS), DHS Mental Health, Individual Placement and Supports (IPS), DVR, or Youth Apprenticeship (YA).

***Interagency Agreements***

DVR has an Interagency Agreement on Transition in place that defines relationships, policies, and procedures between DVR, DPI, and DHS. The agreement is designed to create common understanding and establish collaborative efforts regarding services that will ultimately improve CIE outcomes for students with disabilities who may be eligible for DVR services. This interagency agreement focuses on both students with disabilities transitioning from high school and young adults with disabilities who have an expectation for competitive integrated employment. The three agencies also jointly developed a Technical Assistance Guide (TAG), which puts the agreement into practice. An updated agreement is currently being reviewed and approval is expected in calendar year 2019. This interagency agreement and the TAG are discussed in greater detail in Section D: Coordination with Education Officials.

DVR has a Memorandum of Understanding with DHS that defines the roles of DVR and Long-Term Support. To aid in implementation, DVR and DHS have created an Adult TAG intended to improve communication, coordination, and services for adults with disabilities seeking integrated employment who participate in either the Family Care, Family Care Partnership, PACE, or IRIS long-term care programs **and** are jointly eligible for DVR services. It is designed to be useful for all persons and agencies involved in the process of vocational placement and providing long-term support for CIE. The Adult TAG can be found at https://www.dhs.wisconsin.gov/familycare/mcos/integratedemply.pdf.

***Wisconsin Community of Practice on Transition***

The Wisconsin Community of Practice on Transition is an interagency collaboration that includes partners from DVR, DPI, DHS, BPDD, the Wisconsin Family Assistance Center for Education, Training & Supports (WI FACETS), the Wisconsin State Parent Education Initiative (WSPEI), the UW Waisman Center, Wisconsin Technical Colleges, and parents. The mission of this collaboration is to bring stakeholders together to impact policies, practices, and outcomes for youth with disabilities transitioning to adult life.

***Individualized Placement Services (IPS)***

DVR and the DHS's Division of Care and Treatment Services coordinate oversight of IPS. IPS services require a specific agreement with DVR and approval from DHS to provide IPS.

IPS is an evidence-based model of supported employment for individuals experiencing mental illness. IPS supports individuals experiencing mental illness in their efforts to achieve steady employment in competitive integrated jobs, either part-time or full-time. The individual consumer or job seeker:

- Receives support from Comprehensive Community Services (CCS), a Community Support Program (CSP), or other approved case management program.
- Must have primary diagnosis of serious and persistent mental illness or alcohol or drug abuse.
- Is provided with IPS model information and given the choice to participate in IPS.
- Is referred to DVR upon choosing to participate in IPS programs.

To continue receiving funding for IPS services from DVR and Medicaid, each county site must be part of the statewide learning collaborative, take part in regular fidelity reviews, attain a score of "good" within three years of implementation (or other interval as identified by the IPS statewide team), and report IPS data quarterly. More information about IPS can be found at https://dwd.wisconsin.gov/dvr/service_providers/tech_specs/ips/ips_process.pdf.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

See Section h. 1.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

See Section h. 1.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

*DVR tracks and maintains staffing information by classification and vacancy rate. Position allocation for local Workforce Development Areas (WDAs) statewide is based on census population and new IPE development data. Throughout the WIOA State Plan period, DVR will continue to maintain an average employment plan caseload of approximately 15,500, not to exceed 17,000.*

*The statewide average for active IPEs will not exceed 100 per counselor, recognizing that average case work includes an additional 20 to 25% of a counselor's IPE consumers in applicant and plan development status, plus data collection and collaboration with partner agencies.*

At the WDA level, specific position classifications used to fill allocated positions are based on specific WDA needs and recruitment ability, ensuring that caseloads do not exceed 100 per counselor.

DVR introduced two new position classifications to assist with managing workload, recruitment, and staff retention. Through attrition, these two new classifications will replace the Consumer Case Coordinator position. One position is a Vocational Rehabilitation Specialist, designed to allow counselors more time to focus on counselling by providing case management and project management support. The second position is a Financial Specialist-Senior, which focuses on the purchasing and receiving of services with consumers and service providers.

To assist with workload, DVR contracted with the University of Wisconsin-Stout Vocational Rehabilitation Institute (SVRI) in 2015 to develop an eligibility/OOS review process, authorizing SVRI to collect and make recommendations to appropriate DVR staff for eligibility and OOS determinations. With SVRI completing this service, DVR staff have additional time to focus on working with Potentially Eligible students, developing new IPEs, and working on consumer cases actively in IPE status.

Table 6 below shows the number of permanent authorized FTEs by personnel category and the anticipated vacancies in each category as of August 2019. DVR anticipates an average turnover rate of approximately 10 to 15% each year based on previous year data. DVR's high turnover in the recent past has had an impact on program performance, which was noted in the Comprehensive Statewide Needs Assessment (CSNA) completed in PY 2018. This is an area DVR continues to address, anticipating adequate resources will be available both in fiscal and staff resources moving forward to ensure sustainable caseloads.

**Section VI, Table 6. Permanent Authorized FTEs**

| Job Title | Total Positions | Projected Annual Turnover (# of Positions) |
|---|---|---|
| Vocational Rehabilitation Counselor | 187 | 19 |
| Vocational Rehabilitation Specialist | 31 | 3 |
| Consumer Case Coordinator (as vacancies occur, no longer recruiting for this position) | 4 | 1 |
| Office Associate (field) | 3 | 1 |
| Office Operations Associate (field) | 1 | 1 |

| Job Title | Total Positions | Projected Annual Turnover (# of Positions) |
|---|---|---|
| Financial Specialist-Senior | 39 | 4 |
| Field Managers/Supervisors | 25 | 2 |
| Business Services Consultants | 12 | 1 |
| Central Office Senior Leaders | 7 | 1 |
| Central Office Support Staff | 26 | 3 |
| **Total** | **335** | **36** |

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

DVR tracks and maintains staffing information by classification and vacancy rate. Position allocation for local Workforce Development Areas (WDAs) statewide is based on census population and new IPE development data. Throughout the WIOA State Plan period, DVR will continue to maintain an average employment plan caseload of approximately 15,500, not to exceed 17,000. The statewide average for active IPEs will not exceed 100 per counselor, recognizing that average case work includes an additional 20 to 25% of a counselor's IPE consumers in applicant and plan development status, plus data collection and collaboration with partner agencies.

At the WDA level, specific position classifications used to fill allocated positions are based on specific WDA needs and recruitment ability, ensuring that caseloads do not exceed 100 per counselor.

DVR introduced two new position classifications to assist with managing workload, recruitment, and staff retention. Through attrition, these two new classifications will replace the Consumer Case Coordinator position. One position is a Vocational Rehabilitation Specialist, designed to allow counselors more time to focus on counselling by providing case management and project management support. The second position is a Financial Specialist-Senior, which focuses on the purchasing and receiving of services with consumers and service providers.

To assist with workload, DVR contracted with the University of Wisconsin-Stout Vocational Rehabilitation Institute (SVRI) in 2015 to develop an eligibility/OOS review process, authorizing SVRI to collect and make recommendations to appropriate DVR staff for eligibility and OOS determinations. With SVRI completing this service, DVR staff have additional time to focus on working with Potentially Eligible students, developing new IPEs, and working on consumer cases actively in IPE status.

Table 6 below shows the number of permanent authorized FTEs by personnel category, current vacancies, and the anticipated vacancies in each category as of August 2019. DVR anticipates an average turnover rate of approximately 10 to 15 percent each year, for the next five years, based on previous year data.

**Section VI, Table 6. Permanent Authorized FTEs**

| Job Title | Total Positions | Current Vacancies | Projected Annual Turnover per Year for the next Five Years (# of Positions) |
|---|---|---|---|
| Vocational Rehabilitation Counselor | 187 | 5 | 19 |
| Vocational Rehabilitation Specialist | 31 | 2 | 3 |
| Consumer Case Coordinator (as vacancies occur, no longer recruiting for this position) | 4 | 0 | 1 |
| Office Associate (field) | 3 | 0 | 1 |
| Office Operations Associate (field) | 1 | 0 | 1 |
| Financial Specialist-Senior | 39 | 1 | 4 |
| Field Managers/Supervisors | 25 | 0 | 2 |
| Business Services Consultants | 12 | 0 | 1 |
| Central Office Senior Leaders | 7 | 0 | 1 |
| Central Office Support Staff | 26 | 0 | 3 |
| **Total** | **335** | **8** | **36** |

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

DVR's high turnover in the recent past has had an impact on program performance, which was noted in the Comprehensive Statewide Needs Assessment (CSNA) completed in PY 2018. This is an area DVR continues to address, anticipating adequate resources will be available both in fiscal and staff resources moving forward to ensure sustainable caseloads.

DVR anticipates that the total number of permanent authorized FTEs by personnel category will continue to be needed over the next five years as we anticipate maintaining an average employment plan caseload of approximately 15,500, not to exceed 17,000. The statewide average for active IPEs will not exceed 100 per counselor, recognizing that average case work includes an additional 20 to 25 percent of a counselor's IPE consumers in applicant and plan development status, plus data collection and collaboration with partner agencies.

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

The Wisconsin Department of Safety and Professional Services (DSPS) requires and issues licenses for Licensed Professional Counselors (LPCs), including VR counselors, to practice counseling in the state. There are currently two long-standing institutions of higher education in Wisconsin that have Rehabilitation Counseling programs – the University of Wisconsin-Madison

and the University of Wisconsin-Stout – which offer campus-based and distance learning master's level programs. Marquette University began a Rehabilitation Counseling program in CY 2018, with the first cohort expected to graduate in CY 2020.

In addition to these programs, several universities that matriculate graduate level students in general counseling and related areas recognized by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) are approved by DSPS for the LPC. Other graduate programs pre-approved by DSPS also meet equivalency standards for licensure in Wisconsin. More information on LPC licensing can be found at https://dsps.wi.gov/Pages/Professions/LPC/Default.aspx.

Table 7 shows the number of students who enrolled and graduated during the last year from institutions that provide Rehabilitation Counseling degrees.

**Section VI, Table 7. Rehabilitation Counseling Degrees**

| Graduate School | Graduated 2019 | Students Enrolled |
|---|---|---|
| University of Wisconsin-Madison Rehab Psych | 16 | 30 |
| University of Wisconsin-Stout<br><br>MS VR Program | 19 | 64 |
| Marquette University<br><br>Master's in Clinical Rehabilitation Counseling | NA (first year) | 5 |

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

See Section i. 1. B. i.

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

See Section i. 1. B. i.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

In addition to new position classifications that have been developed to ensure DVR business needs are met (see Section I-a), DVR continues its relationship with local Rehabilitation Counseling graduate programs and other counseling programs to help build a pipeline of candidates for future recruitment. DVR encourages students from the local Rehabilitation Counseling programs to apply for internships and practicums with DVR. Many VR Counselor hires are former interns or practicum students.

In its recruitment materials and practices, DVR requires that applicants for VR counselor positions meet the standards for employment as specified by DSPS and as required by Wisconsin State Statute. With the reduction of rehabilitation counselor graduates and applicants statewide, DVR has hired many licensed counselors who come from a general counseling background. DVR's hiring plan includes coordination of job announcement postings with diverse entities in the state, including partners in the one-stop system, professional organizations, and accredited university programs. DVR also seeks to attract candidates from other states as part of its hiring strategies. For internships, DVR will continue to target university programs that attract diverse students, including individuals with disabilities.

Job announcements are posted using various media serving minority groups and advertised across partners in the one-stop system, including partners that specialize in services to target groups. DVR regularly evaluates and modifies recruitment efforts and in-service training plans to ensure all personnel, particularly VR counselors, meet the highest standards in Wisconsin applicable to their job classification. Staff retention is a key element of succession planning, and DVR management regularly reviews this topic and includes retention as part of strategic planning efforts.

DVR will continue to focus on retention of staff members who receive their initial employment with DVR but are recruited away by other employers for higher salaries. In addition to this common occurrence, DVR has also experienced senior staff attrition due to compensation issues, another area the CSNA recommended that DVR address.

DVR has worked diligently over the past several years to address compensation concerns and continues to work with DWD's Human Resources staff to focus on retention efforts that will adequately compensate DVR staff. DVR has been able to provide some pay adjustments; however, additional work must be completed to get all DVR staff to an appropriate level of compensation.

DVR completed an all-staff stay survey in PY 2018 to identify what keeps employees with the agency. The results have been used to identify areas that DVR can build upon to help retain current employees. DVR has worked to create a work environment where employees want to work by providing employees as much flexibility as possible, maintaining focus on employee wellness and work life balance. As part of the CSNA, DVR was encouraged to continue to provide wellness activities for staff. DVR leaders will also look for additional tools to augment compensation packages to further address retention efforts.

## 3. PERSONNEL STANDARDS

### A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

Personnel standards for VR counselors in Wisconsin are established in Chapter 457 of the Wisconsin State Statutes under licensure requirements for the title of "Professional Counselor".

Under these rules, individuals who practice professional counseling must have a state license or hold a temporary license or training certificate. Counselors must have a master's degree in Rehabilitation Counseling or closely related fields, complete 3,000 hours of post-master's degree clinical supervision, pass the National Board for Certified Counselors exam or the Commission on Rehabilitation Counselor Certification (CRCC) exam, and pass the Wisconsin licensure examination. This state personnel standard exceeds the national standard**.** DVR holds a seat on Professional Counselor Licensure Board through DSPS to promote DVR's interests and recruitment needs, prepare and retain qualified staff, and stay up to date on rule changes.

Since May 1992, all VR Counselors employed by DVR have met the State required standards for licensure as a condition of employment, including all LPC continuing education requirements, which include courses in professional counselor ethics and boundaries. For paraprofessional staff, personnel standards are established by DVR and the State of Wisconsin. Opportunities for continuing education courses are open to all paraprofessional and professional rehabilitation counselor staff. DVR provides and requires that all newly hired staff participate in a comprehensive orientation and training program that occurs early in employment.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

Personnel standards for VR counselors in Wisconsin are established in Chapter 457 of the Wisconsin State Statutes under licensure requirements for the title of "Professional Counselor". Under these rules, individuals who practice professional counseling must have a state license or hold a temporary license or training certificate. Counselors must have a master's degree in Rehabilitation Counseling or closely related fields, complete 3,000 hours of post-master's degree clinical supervision, pass the National Board for Certified Counselors exam or the Commission on Rehabilitation Counselor Certification (CRCC) exam, and pass the Wisconsin licensure examination. This state personnel standard exceeds the national standard and ensures VR Counselors have 21st century understanding of the evolving needs of the labor force and individuals with disabilities. DVR holds a seat on the Professional Counselor Licensure Board through the Wisconsin Department of Safety and Professional Services (DSPS) to promote DVR's interests and recruitment needs, prepare and retain qualified staff, and stay up to date on rule changes.

Since May 1992, all VR Counselors employed by DVR have met the State required standards for licensure as a condition of employment, including all LPC continuing education requirements, which include courses in professional counselor ethics and boundaries. For paraprofessional staff, personnel standards are established by DVR and the State of Wisconsin. Opportunities for continuing education courses are open to all paraprofessional and professional rehabilitation counselor staff. DVR provides and requires that all newly hired staff participate in a comprehensive orientation and training program that occurs early in employment. DVR's established maintenance of education/experience requirements and offerings ensure its personnel have 21st century understanding of the evolving needs of the labor force and individuals with disabilities.

4. STAFF DEVELOPMENT

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT,

VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

The educational needs for DVR personnel are determined based on input from several sources, which include, but are not limited to:

- RSA regulatory language (34 CFR Part 361)
- Wisconsin Statutes and Administrative Code (administered by DSPS)
- Comprehensive Training Needs Assessment
- Comprehensive Statewide Needs Assessment
- Professional state councils, (e.g., WRC)
- Individual performance reviews

DVR conducts a comprehensive training needs assessment twice every five years by administering a survey. DVR obtains input on training needs from various state councils and organizations, primarily WRC, and incorporates training recommendations identified in the CSNA. Several training needs, specifically for underserved populations, mental health disabilities, and opioid use, were identified in the most recent CSNA, and those trainings will be provided to staff over the next few years. Computerized training records are kept for each employee, and annual employee Goals and Accomplishments Reviews, or GARs, are conducted by management with each employee. Individual reviews help DVR identify where additional training is needed and for which staff.

Wisconsin statutes and administrative codes outline specific training needs based upon licensure requirements for VR counselors to practice in Wisconsin. The Division maintains a membership with the Commission on Rehabilitation Counselor Certification (CRCC), which awards continuing education hours to staff at no cost to the staff member. Continuing education hours are essential for VR counselors to maintain state licensure. DVR may direct employees to attend training, providing all expenses are paid.

To minimize staff turnover and promote leadership development, all staff are encouraged, and as appropriate, funded to participate in capacity building training activities. Additionally, DVR provides training to statewide management staff at bi-monthly meetings. Through a paid annual application to CRCC, DVR is granted the ability to pre-approve continuing education hours for participants in training programs conducted or coordinated by DVR.

DVR provides comprehensive new staff training to all new employees. This training program examines DVR processes from point of referral and application through case closure and follow-along. The program also incorporates material on rehabilitation technology resources, effective counseling and assessment practices, and other key components of successful rehabilitation outcomes. DVR continues to ensure that all professional staff understand and are trained to meet job description performance standards. DVR uses various training modes including regional training, study halls, WDA trainings, and all-staff conferences to provide staff training. DVR training topics include policy, processes, collaboration, motivational interviewing, trauma informed care, ethics, communication under pressure, and wellness. If funds and time allow, DVR will continue to provide these opportunities to staff as part of a professional development program. Specific attention will be placed on updating and incorporating vocational counseling,

job placement, rehabilitation technology, and assessment tools and practices into the training curriculum.

DVR collaborates with UW-Stout and the Independent Living Council of Wisconsin to offer AT training to DVR consumers and staff at venues across the state. DVR will continue to emphasize the use of rehabilitation technology services and resources in presentations to professional and paraprofessional staff to identify and access training material (including online formats) available from a variety of Wisconsin resources and other VR agencies. As needed, DVR will also continue to seek resources from RSA through its technical assistance offerings.

New DVR supervisors are required to attend supervisory trainings offered by DWD. DVR has also implemented training targeted at staff members who have demonstrated management skills, which may play an important role when supervisory positions open in the future. DVR staff members are selectively sponsored for advanced management and leadership training through the Wisconsin Enterprise Management Development Academy and DWD Aspiring Leaders Training. DVR has also supported sending one or two managers per year to attend the National Rehabilitation Leadership Institute and VR Supervisory Academy. DVR also provides ongoing training for all managers at supervisory administrative meetings.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

DVR developed a platform called the Information Center that provides access to VR regulatory and program policy information on key issues and topics of relevance to program staff, consumers, and the general public. This online resource promotes consumer informed choice and ready access to key VR information for staff regardless of location. The Information Center includes VR federal and state requirements and rules, policy interpretations, procedures, guidance, and informational items in a user-friendly Q&A format. The Information Center also features a web search option that cross-references and indexes all the policies, directives, and related guidance affecting the VR program.

Before posting to the DVR website and the Information Center, DVR policy and written guidance pieces are reviewed and approved by DVR's Policy Academy and senior leadership team. The Policy Academy is composed of a cross section of professional, paraprofessional, and management staff. VR Policy Analysts review and revise the material to keep it accurate and up-to-date. The Information Center can be found at https://dwd.wisconsin.gov/dvr/info_ctr/default.htm.

DVR employs two full-time Policy Analysts who provide ongoing technical assistance, consultation, and training to statewide staff on service delivery issues as mandated by the Rehabilitation Act. DVR Policy Analysts also develop guidance and best practices for staff by researching other state practices, conducting literature reviews, researching state and federal laws, and participating in the DVR Policy Academy. The purpose of the Policy Academy is to address and develop policy and guidance pieces and background information on topics relevant to VR in Wisconsin. Members of the Policy Academy take the information from these meetings back to their respective WDA and disseminate to staff.

As a critical component of training, meetings are periodically scheduled for DVR WDA Directors and Supervisors, during which various training topics are addressed. Employing a "Train the Trainer" model, Directors and Supervisors are then responsible for training their local field staff and recording the training event in the minutes of their WDA meetings.

A link to the National Clearinghouse of Rehabilitation Training Materials (NCRTM) website hosted by Utah State University is available from the DVR's internal Training Opportunities page. The NCRTM site includes a digital library with research and resource material, opportunities for online continuing education credits, and more. Information from the Clearinghouse is periodically brought to the attention of staff statewide. Staff can also access research information disseminated through teleconferences and webinars sponsored by RSA and the national network of disability research and training entities. DVR also participated in the PROMISE Grant and will continue to share research findings and evidence-based practices with staff related to that project.

Research findings and promising techniques, including information from the RSA Technical Assistance Centers, CSAVR, and WINTAC, are regularly shared with staff. Research findings are also used in project and grant development activities initiated by DVR. One example is the use of data from internal research and other sources in the development of technical specifications for service provider agreements, transition, assistive technology, and supported employment special projects.

DVR also uses research findings to strengthen service quality efforts. Results are shared with the Policy Academy and other staff to inform agency changes and improvements. DVR's website contains links to pertinent research information and scheduled training opportunities from internal and external sources. Web training resources are also regularly updated and disseminated to staff via our internal website and email communications.

Continuing education opportunities relative to research findings are made available through the dissemination of published materials, access to webinars, and onsite training sponsored by leading Rehabilitation Research and Training Centers (RRTCs). RRTCs include Virginia Commonwealth University RRTC workplace supports and job retention, Mississippi RRTC on blindness and low vision, the Institute for Community Inclusion VR RRTC, Cornell RRTC on disability demographics and statistics, and the Hunter College RRTC on improving employment outcomes. Research and practice-based publications from the Institute on Rehabilitation Issues (IRI monographs) are shared with DVR staff and management, and DVR staff also participate in training seminars and webinars sponsored by RSA.

DVR will continue to emphasize the need to use and apply research when developing guidance, best practices, and staff trainings. Guidance and best practices will continue to be vetted through DVR's Policy Academy and disseminated to staff through various means, including email, staff and management meetings, DVR's internal web site, and the DVR Information Center. As needed, specific staff training will also be developed and provided.

### 5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

DVR maintains the ability to communicate with customers in their preferred mode using a variety of resources. Designated staff maintain and coordinate foreign language translation and interpreter lists, including remote and onsite Communication Access Realtime Translation, or CART, services.

To further meet communication needs, DVR recruits staff fluent in Spanish, Hmong, and American Sign Language. DVR also maintains relationships with providers for both verbal and written translations in over 60 languages. Verbal translations are available, on demand, via phone. Translations of DVR's most frequently used publications and forms are available in Spanish and Hmong in print-on-demand format on DVR's public website. Audio materials are also available as needed via a contracted provider. DVR contracts out to prepare braille materials and, as needed, converts existing materials to large print format.

### 6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As required by WIOA, DVR has an Interagency Agreement with the WI Department of Public Instruction (DPI) that is designed to create common understanding and establish collaborative efforts regarding services that will ultimately improve employment outcomes for students with disabilities who may be eligible for DVR services. In order to provide those services, staff from DVR and LEA's must have shared knowledge of the most effective way to provide transition services to students with disabilities. Annually, DPI is awarded the Transition Improvement Grant (TIG) from the federal Department of Education to provide effective, targeted, and low-cost professional development to WI youth, parents, educators, and stakeholders in the area of transition to improve postsecondary outcomes for students with disabilities. Once a year, the (TIG) staff meet with DVR START to provide updates and feedback on how collaborative services are being provided to students at the local level. TIG sponsors transition services trainings and DVR transition staff participate in those events with staff from the local LEA's. This shared learning enhances the development of best practice in providing collaborative transition services to students with disabilities. TIG also maintains a website that provides online learning materials and resources on transition for DVR and LEA staff to access for professional development. https://www.witig.org/

## J. STATEWIDE ASSESSMENT

### 1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

### A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

DVR conducted a Comprehensive Statewide Needs Assessment (CSNA) in PY 2018 to assess the rehabilitation needs of individuals with disabilities residing in the state. DVR chose to contract the service and selected San Diego State University as the CSNA vendor. The full CSNA report can be found at
https://dwd.wisconsin.gov/dvr/pdf_files/Wisconsin2018CSNAReport_Final.pdf.

DVR also receives input on the rehabilitation needs of individuals with disabilities in Wisconsin through the Wisconsin Rehabilitation Council (WRC), public hearings, stakeholder workgroups, consumer surveys, and public comment.

The CSNA identified the following recurring themes related to the needs of individuals with the most significant disabilities, including their need for supported employment:

Transportation remains the most significant need of consumers served by DVR, particularly in rural areas.

- The most frequently cited vocational rehabilitation needs of individuals with the most significant disabilities included all types of training (work skills training, formal education, and social skills development training), and work experiences.
- Employer misconceptions about the abilities of individuals with disabilities is a substantial barrier to employment and is more pronounced for individuals with the most significant disabilities.
- DVR is serving increasing numbers of consumers who have significant mental health impairments. DVR staff and service providers need training to ensure they are aware of how to best serve this population.
- As the number of individuals working in subminimum wage employment in Wisconsin continues to decrease, DVR and its network of providers needs to ensure ongoing capacity to meet the demand by further developing capacity to provide supported and customized employment.
- Self-advocacy training for individuals with disabilities is an essential rehabilitation need.

Feedback received from other sources included this additional theme:

DVR should engage with service providers who provide supported employment to improve quality, identify needs, provide adequate funding, and increase collaboration between partners.

B. WHO ARE MINORITIES;

The CSNA identified the following recurring themes related to the needs of individuals with disabilities who are from minority racial or ethnic groups:

- The most frequently cited vocational rehabilitation needs of minorities with disabilities include the need to increase and develop job skills, soft skills, work experience, and education and training.
- Language difficulties coupled with a mistrust of government organizations is a barrier for some minorities with disabilities in accessing DVR services. Targeted outreach to community organizations serving minority individuals must take place to increase awareness of DVR services and the rate of these individuals accessing DVR services.
- Hmong, Native American, and LGBTQ individuals were identified as being potentially underserved by DVR.
- Disparities exist in the percentage of individuals who are African American and Latino/Hispanic achieving employment outcomes and enrolling in postsecondary training at technical, four-year, and graduate-level institutions.

Feedback received from other sources include these additional themes:

- DVR should identify specific target minority groups and locations within the state to better identify baseline participation rates and outreach efforts.
- DVR should identify if specific training for DVR staff and service providers would assist in community outreach efforts.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The CSNA identified the following recurring themes related to the needs of individuals with disabilities who have been unserved or underserved:

- The most frequently cited vocational rehabilitation needs of individuals with disabilities who may have been unserved or underserved by the VR program include the need to develop job skills, increase education or training, participate in work experiences, and develop soft skills.
- Hmong, Native American, and LGBTQ individuals were identified as being potentially underserved by DVR. Targeted outreach to community organizations serving these groups must take place to increase awareness of DVR services and the rate of these individuals accessing DVR services.

Feedback received from other sources include these additional themes:

- DVR should identify specific underserved or unserved groups and locations within the state to better identify baseline participation rates and outreach efforts.
- DVR should identify if specific training for DVR staff and service providers related to unserved and underserved populations would assist in community outreach efforts.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

Recurring themes from the CSNA in this area include:

- WIOA Title I and III programs have made progress in serving individuals with disabilities, but their relationship with DVR remains one primarily of referral rather than co-enrollment and braided funding.
- Programmatic accessibility is still a concern in many of Wisconsin's Job Centers as assistive technology is often out-of-date or employees are not trained on how to use the technology.
- Ongoing consistent cross-training between the core partners is needed so staff are aware of how each other's programs function and what service limitations exist.
- Job Center staff need to receive ongoing training on how to effectively work with individuals with disabilities, especially those with mental health impairments.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

Recurring themes in this area from the CSNA include:

- All five required Pre-Employment Transition services represent significant rehabilitation needs of students with disabilities in Wisconsin, with work-based learning experiences being the most significant and important need. DVR expends all Pre-Employment Transition services reserve funds on the five required services.
- Transportation is a major barrier for students and their ability to access work opportunities.
- DVR has committed considerable time and energy into developing services for youth and students with disabilities and this effort is paying off in terms of the strong partnership developed with Wisconsin educational agencies and the number of youth and students they serve.
- The primary rehabilitation needs of youth with disabilities in Wisconsin are work skills, soft skills, education, training, and transportation.
- The PROMISE program was repeatedly cited as a model program for youth in transition.
- Youth with disabilities in Wisconsin need to develop the ability to advocate for themselves to ensure they have access to the same opportunities as their peers without disabilities.

### 2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Recurring themes in this area based on the CSNA include:

- DVR has developed a demand vs. supply mapping system to help identify where certain VR services need to be developed across the state.
- The need to develop service providers is greatest in rural areas, especially providers for supported and customized employment.
- DVR needs additional service providers who are skilled in working with individuals with mental health impairments.

Feedback received from other sources include these additional themes:

- DVR can increase efforts to develop a comprehensive system of employment services for individuals with disabilities with other state-level partners that includes common quality measures and addresses funding stability, capacity, and staffing issues.
- DVR should engage with service providers who provide supported employment to improve quality, identify needs, provide adequate funding, and increase collaboration between partners.

### 3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

Recurring themes in this area from the CSNA include:

- All five required Pre-Employment Transition services represent significant rehabilitation needs of students with disabilities in Wisconsin, with work-based learning experiences being the most significant and important need. DVR expends all Pre-Employment Transition services reserve funds on the five required services.
- Transportation is a major barrier for students and their ability to access work opportunities.
- DVR has committed considerable time and energy into developing services for youth and students with disabilities and this effort is paying off in terms of the strong partnership developed with Wisconsin educational agencies and the number of youth and students they serve.
- The primary rehabilitation needs of youth with disabilities in Wisconsin are work skills, soft skills, education, training, and transportation.
- The PROMISE program was repeatedly cited as a model program for youth in transition.
- Youth with disabilities in Wisconsin need to develop the ability to advocate for themselves to ensure they have access to the same opportunities as their peers without disabilities.

## K. ANNUAL ESTIMATES

### 1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

According to the 2017 Disability Status Report - Wisconsin and the 2018 US Census Bureau, the number of individuals (civilian non-institutionalized) aged 15 through 64 with a disability in Wisconsin is approximately 352,000. The breakdown by age and percent with disability is in Table 8. Projections through 2021 are in Table 9.

**Section VI, Table 8. Eligible for Services - Breakdown by Age**

| | 2017 Percentage with a Disability by Age Group | 2018 Total Wisconsin Population |
|---|---|---|
| **15 to 19 years** | 6.8% | 378,566 |
| **20 to 24 years** | 9.6% | 394,807 |
| **25 to 34 years** | 9.6% | 735,765 |
| **35 to 44 years** | 9.6% | 706,676 |
| **45 to 54 years** | 9.6% | 738,357 |

| | 2017 Percentage with a Disability by Age Group | 2018 Total Wisconsin Population |
|---|---|---|
| **55 to 59 years** | 9.6% | 419,486 |
| **60 to 64 years** | 9.6% | 405,255 |

**Section VI, Table 9. Eligible for Services Projections**

| | 2019 Projection | 2020 Projection | 2021 Projection |
|---|---|---|---|
| **15 to 19 years** | 25,755 | 25,768 | 25,780 |
| **20 to 24 years** | 37,920 | 37,938 | 37,956 |
| **25 to 34 years** | 70,669 | 70,704 | 70,739 |
| **35 to 44 years** | 67,875 | 67,909 | 67,943 |
| **45 to 54 years** | 70,918 | 70,953 | 70,988 |
| **55 to 59 years** | 40,291 | 40,311 | 40,331 |
| **60 to 64 years** | 38,925 | 38,944 | 38,963 |
| **Total** | **352,353** | **352,527** | **352,700** |

Note: Based on Wisconsin's sluggish population growth overall it is estimated the population growth for people with disabilities to be .0005

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

During FFY 2018, DVR served 31,510 individuals with disabilities. As of August 2019 (11/12 of the way through FFY 2019), DVR has served 30,045 individuals with disabilities. It is anticipated that DVR will continue to serve at the current level in FFY 2020 and 2021, or approximately 31,000 people with disabilities. This is based on the economy, unemployment rate, intended state match funding, staffing patterns, and VR policies remaining constant.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

Of those individuals served in FFY 2018, 927 individuals with the most significant disabilities received supported employment services. After Wisconsin DVR exhausts all funds under the Title VI-B supported employment program, Title IB funds are used for supported employment costs.

In FFY 2018, 601 Adults and 326 Youth received supported employment services. The average cost per case for services following employment was $3,099. Based on those figures and the anticipated continued funding level of the Title VI-B grants, it is expected that 900 individuals will receive services for FFY 2020 and 2021 under the Title VI-B supported employment program and Title IB funds.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

**Current OOS:**

Wisconsin is currently using an OOS in accordance with the State Plan. The following shows the number of individuals under each priority category within the OOS for FFY 2019:

- Category 1 (most significant disabilities) 12,965
- Category 2 (significant disabilities) 15,259
- Category 3 (all others) 147
- Referral/Applicant/Closed before OOS 1,904

**Total Served 30,274**

**Projected OOS:**

During FFY 2020 it is anticipated that OOS Category 1 will decrease slightly, and OOS Category 2 will decrease more significantly. OOS Category 3 fluctuates throughout the year between 70 to 150 consumers, but overall remains consistent from one year to the next. It is anticipated that FFY 2021 will increase slightly again in both Categories 1 and 2 due to the expected downturn in the economy as shown below:

| OOS Consumer Projections | FFY 2020 | FFY 2021 |
|---|---|---|
| **Category 1**<br><br>**(most significant disabilities)** | 12,200 | 12,350 |
| **Category 2**<br><br>**(significant disabilities)** | 14,000 | 14,300 |
| **Category 3**<br><br>**(all other)** | 147 | 150 |

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Currently, DVR immediately serves individuals with the most significant disabilities (OOS Category 1) and individuals with significant disabilities (OOS Category 2) without placing them on a wait list. All other eligible individuals (OOS Category 3) are currently placed on the OOS wait list indefinitely.

As of June 30, 2019, 97 individuals were in OOS Category 3 on the wait list. This number ranges from 70 to 150 throughout the year. DVR contacts those individuals annually to notify them of their wait list status and provide other employment resources. Individuals on the wait list may choose to be removed or provide information for review of their category placement.

DVR expects to move to a wait list for Category 2, and possibly Category 1 by the end of FFY 2021 depending on access to additional state matching funds. DVR has over-matched in the past several years to avoid a maintenance of effort (MOE) penalty. DVR will request additional match in the next state biennial budget to address this.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

In Program Year (PY) 2018, the total case service expenditures, including all funds for supported employment and from Social Security Reimbursement Program, were $56,957,684. There were 26,185 consumers served in different phases throughout the PY including:

- Individualized Plan for Employment (IPE) in Development
- Active IPE
- Successful Closure
- Unsuccessful Closure

The average cost per consumer for the PY was $2,175.

This average cost per consumer is expected to remain static at $2,175 for FFY 2020 resulting in total projected expenditures of case services of approximately $57,000,000. Wisconsin DVR estimates an increase in the average cost per consumer for FFY 2021 as a result of a planned rate increase for certain contracted statewide services. DVR also expects a slight increase in consumer counts due to the projected economic downturn. This could result in an additional $3.5 million in case service expenditures or an estimated total expenditures of $60,500,000. The projections broken out by OOS Category are below:

| | Average Cost/ Consumer FFY 2020 | Number of Consumers FFY 2020 | Total Expense Case Services FFY 2020 | Average Cost/ Consumer FFY 2021 | Number of Consumers FFY 2021 | Total Expense Case Services FFY 2021 |
|---|---|---|---|---|---|---|
| **OOS Category 1** | $2,419 | 12,200 | $29,511,800 | $2,519 | 12,350 | $31,109,650 |
| **OOS Category 2** | $1,965 | 14,000 | $27,510,000 | $2,055 | 14,300 | $29,386,500 |
| **OOS Category 3 (on wait list)** | $0 | 147 | $0 | $0 | 150 | $0 |

Note: Total FFY costs also include Referral/Applicant costs closed before the OOS is determined (approximately 1,900 per year).

As reflected above, the average FFY 2020 annual expense to serve Category 2 consumers is $1,965 and expected to increase to $2,055 in FFY 2021. If DVR decided to begin serving OOS Category 3 consumers the cost would be as follows assuming all Category 3 consumers would be moved to Category 2:

| | FFY 2020 | FFY 2021 |
|---|---|---|
| **Projected Category 3 Consumers** | 147 | 150 |
| **Projected Cost per FFY** | $1,965 | $2,055 |

| | FFY 2020 | FFY 2021 |
|---|---|---|
| **Total** | $288,855 | $308,250 |

In addition to financial resources, activating consumers on the wait list would require human resources for case management. In recent years, DVR counselor caseload ratio met DVR's goal of no more than 100 consumers with active IPEs per counselor per month, recognizing that another 20 to 25 percent are individuals in applicant or plan development status. Although DVR's caseloads remain at acceptable levels, trends show that cases are becoming more complex and consumers are staying on caseloads longer than in previous years. For that reason, DVR will continue to manage its fiscal resources using the OOS to ensure that all active Individualized Plans for Employment will continue to be fully supported throughout FFY 2020.

## L. STATE GOALS AND PRIORITIES

### 1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

To align with the requirements and performance expectations of the Rehabilitation Act and implement regulations, DVR and the Wisconsin Rehabilitation Council (WRC) jointly developed and agreed to annual goals and priorities consistent with the provisions and requirements of Section 106 of the Act and generally the spirit and intent of WIOA.

To meet or exceed performance goals defined by the Rehabilitation Services Administration and outcome goals of the Wisconsin Competitive Integrated Employment (CIE) report by aligning agency activities to the priorities listed below.

Priority 1: Transition DVR to a caseload focused on youth and individuals with the most significant disabilities to ensure that all individuals with disabilities who want to work can share their unique workforces with their communities and the workforce. Use Pre-Employment Transition Services to allow students the opportunity to explore and gain experience in CIE.

Priority 2: Use and expand on evidence-based practices that advance employment for individuals with the most significant disabilities including Project SEARCH, Individual Placement and Support (IPS), and other programs to increase successful CIE outcomes.

Priority 3: Improve services and outcomes for underserved populations by providing education and training, developing work skills, and creating employment connections. Target outreach to community organizations serving minority individuals to ensure access to and awareness of DVR services in these communities.

Priority 4: To increase statewide outcomes in CIE, collaborate with other partners, including long-term care services, to provide a systematic, braided approach to working with individuals with the most significant disabilities needing additional employment supports.

Priority 5: Lead an interagency service provider capacity workgroup that includes service providers and representatives from the Wisconsin Departments of Health Services (DHS) and Public Instruction (DPI) to consider options for business models, training, technical assistance, and service provider incentives to increase capacity and options for statewide employment services.

Priority 6: Provide training to DVR staff and service providers to ensure they are aware how to best serve individuals with substance use and mental health disabilities, two populations that are increasingly seeking DVR services. Continue to expand collaboration efforts with the DHS

Division of Care and Treatment Services to include Individual Placement and Support (IPS) to improve employment outcomes for DVR consumers with mental health disabilities.

Priority 7: Continue to operate the DVR Business Services Initiative with 12 Business Services Consultants (BSCs) working with regional Business Service Teams, conducting outreach to businesses to identify their workforce needs, developing partnerships, and offering technical assistance to workforce partners and businesses on the ADA and accommodations for people with disabilities to increase employment outcomes.

Priority 8: Expand collaborative partnerships with WIOA partners by providing staff cross-training on programs and technical assistance on how to effectively work with individuals with disabilities to increase co-enrollment and braided funding. Work with WIOA Title III to ensure assistive technology (AT) is available in Job Centers for individuals who require AT equipment to access Job Center services.

Priority 9: Increase education and training in skilled occupations, including STEM careers, to improve employment outcomes resulting in self-supporting wages and opportunities for consumers to work in diverse workforce sectors.

## 2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

DVR Goal: To meet or exceed performance goals defined by the Rehabilitation Services Administration and outcome goals of the Wisconsin Competitive Integrated Employment (CIE) report by aligning agency activities to the priorities listed below.

Priority 1: Transition DVR to a caseload focused on youth and individuals with the most significant disabilities to ensure that all individuals with disabilities who want to work can share their unique workforces with their communities and the workforce. Use Pre-employment Transition services to allow students the opportunity to explore and gain experience in CIE.

Priority 2: Use and expand on evidence-based practices that advance employment for individuals with the most significant disabilities including Project SEARCH, Individual Placement and Support (IPS), and other programs to increase successful CIE outcomes.

Priority 3: Improve services and outcomes for underserved populations by providing education and training, developing work skills, and creating employment connections. Target outreach to community organizations serving minority individuals to ensure access to and awareness of DVR services in these communities.

Priority 4: To increase statewide outcomes in CIE, collaborate with other partners, including long-term care services, to provide a systematic, braided approach to working with individuals with the most significant disabilities needing additional employment supports.

Priority 5: Lead an interagency service provider capacity workgroup that includes service providers and representatives from the Wisconsin Departments of Health Services (DHS) and Public Instruction (DPI) to consider options for business models, training, technical assistance,

and service provider incentives to increase capacity and options for statewide employment services.

Priority 6: Provide training to DVR staff and service providers to ensure they are aware how to best serve individuals with substance use and mental health disabilities, two populations that are increasingly seeking DVR services. Continue to expand collaboration efforts with the DHS Division of Care and Treatment Services to include Individual Placement and Support (IPS) to improve employment outcomes for DVR consumers with mental health disabilities.

Priority 7: Continue to operate the DVR Business Services Initiative with 12 Business Services Consultants (BSCs) working with regional Business Service Teams, conducting outreach to businesses to identify their workforce needs, developing partnerships, and offering technical assistance to workforce partners and businesses on the ADA and accommodations for people with disabilities to increase employment outcomes.

Priority 8: Expand collaborative partnerships with WIOA partners by providing staff cross-training on programs and technical assistance on how to effectively work with individuals with disabilities to increase co-enrollment and braided funding. Work with WIOA Title III to ensure assistive technology (AT) is available in Job Centers for individuals who require AT equipment to access Job Center services.

Priority 9: Increase education and training in skilled occupations, including STEM careers, to improve employment outcomes resulting in self-supporting wages and opportunities for consumers to work in diverse workforce sectors.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

DVR completed a Comprehensive Statewide Needs Assessment (CSNA) in PY 2018 through a contract with San Diego State University. The report was reviewed with the Wisconsin Rehabilitation Council (WRC) in February 2019. Information collected from the CSNA was used to develop priorities and goals for the DVR State Plan.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

DVR completed a Comprehensive Statewide Needs Assessment (CSNA) in PY 2018 through a contract with San Diego State University. The report was reviewed with the Wisconsin Rehabilitation Council (WRC) in February 2019. Information collected from the CSNA was used to develop priorities and goals for the DVR State Plan. Much of the information included in the CSNA was based on data obtained directly from Wisconsin DVR. This data provided insight into areas where Wisconsin was performing well, and areas potentially needing improvement. DVR has also analyzed data related to supported employment, Pre-Employment Transition Services,

service provider capacity and performance, and business services. This additional analysis assisted in the development of DVR's priorities.

DVR created a tab on the DVR Dashboard that mirrors the RSA quarterly performance dashboard reports that provide "real time" performance data. Having this data months ahead of RSA providing it allows Wisconsin to more adeptly take corrective action if goals are not being met. As goals have not been established, except for Pre-Employment Transition Services expenditures, DVR has been focused on improving performance from one year to the next. DVR has seen performance improvements through intensive staff training. Knowing the areas where DVR is doing well and where improvement is needed allows DVR to set priorities for existing resources.

DVR seeks to align data with other core WIOA partners through common intake and data integration to better serve participants in a timely and comprehensive manner across titles. The WIOA Senior Leadership Team and partners across the state work to initiate common intake. Accurate reporting in the RSA-911 and WIOA Participant Individual Record Layout (PIRL) will also help partners improve consumer service delivery.

As part of 2017 Wisconsin Act 178, or Competitive Integrated Employment (CIE), DVR is working with DPI and DHS to meet the CIE reporting requirements and measure successful progress toward improved CIE outcomes for individuals with the most significant disabilities.

DVR was monitored in CY 2019. At the time of State Plan development, the report has not yet been received. Over the last four years, DVR has regularly sought technical assistance from RSA and WINTAC when developing and implementing policies and practices required for WIOA compliance. DVR has also sought technical assistance and provided feedback on revised reporting standards while updating annual and quarterly federal reports.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

DVR was monitored in CY 2019. At the time of State Plan development, the report has not yet been received. Over the last four years, DVR has regularly sought technical assistance from RSA and WINTAC when developing and implementing policies and practices required for WIOA compliance. DVR has also sought technical assistance and provided feedback on revised reporting standards while updating annual and quarterly federal reports.

M. ORDER OF SELECTION

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

Yes, Wisconsin DVR will implement an OOS.

**A. The order to be followed in selecting eligible individuals to be provided VR services.**

Consumers with the most significant disabilities will be given priority, consumers with significant disabilities will be given second priority, and other eligible consumers with disabilities will be given third priority.

Category 1: A consumer has a most significant disability if a mental or physical impairment seriously limits four or more of the consumer's functional capacities in terms of an employment outcome and the consumer's vocational rehabilitation requires multiple services over an extended period.

Category 2: A consumer has a significant disability if a mental or physical impairment seriously limits one or more of the consumer's functional capacities in terms of an employment outcome and the consumer's vocational rehabilitation requires multiple services over an extended period.

**Note**: Consumers who receive SSI or SSDI are considered to have at least a significant disability, and therefore placed in Category 1 or 2.

Category 3: Other eligible consumers include those who do not have a disability that seriously limits one or more functional capacities and do not require multiple services over an extended period. Also included in this category are all consumers who do not require multiple services over an extended period.

B. THE JUSTIFICATION FOR THE ORDER

Currently, DVR consumers with the most significant disabilities and significant disabilities in Categories 1 and 2 are immediately activated to start IPE development. Other eligible consumers with disabilities in Category 3 are on an indefinite waitlist. DVR personnel contact consumers on the Category 3 waitlist annually to discuss potential changes to their disabilities or limitations that might affect their category placement. DVR staff also provide local employment-seeking resources to consumers on the waitlist.

This order is justified as DVR continues to adapt to the changing nature of caseloads as a result of WIOA. DVR staff are working with more consumers who are students, who tend to have longer than average caseloads as they pursue education, training, and temporary work experiences. Additionally, the low unemployment rate in Wisconsin and nationally has DVR staff working with more consumers with the most significant disabilities, such as severe and persistent mental illness and developmental disabilities, who often have longer case lengths and receive more intensive services such as extensive vocational guidance and counseling and supported employment. Furthermore, DVR's continued focus on developing sustainable job goals with consumers often requires consumers to pursue formal job training or education to reach their goals. Finally, limited fiscal resources and staff capacity impede DVR's ability to serve all eligible individuals in the State of Wisconsin.

C. THE SERVICE AND OUTCOME GOALS

DVR will continue with the current OOS plan, which has the support of the Wisconsin Rehabilitation Council (WRC), as long as resources are available. Categories 1 and 2 will continue to be activated immediately through FFY 2021, and other eligible consumers with disabilities will remain on a wait list in Category 3 with annual contact by DVR to discuss any needs for possible reassessment.

DVR reviews resources (staff and financial) and consumer demands monthly to project if a wait list may need to be activated for Category 2 (and possibly Category 1). DVR will request

additional state match funds in the next biennial budget. Without additional funds, due to over-matching in past years, Wisconsin DVR may be forced to close additional categories.

DVR outcomes for PY 2018 cases with expenses were as follows:

| Outcome | Number Consumers | % of Total |
|---|---|---|
| IPE in Development | 1,853 | 7% |
| Active IPE | 15,193 | 58% |
| Successful Closure | 3,590 | 14% |
| Unsuccessful Closure | 5,549 | 21% |

Based on previously described projected number of consumers in each OOS Category, and based on outcome percentages from PY 2018, DVR expects to see the following number of consumers and outcomes in OOS Category 1 and Category 2 in FFY 2020 and FFY 2021:

| FFY/Category | Consumers | IPE in Development (7%) | Active IPE (58%) | Successful Closure (14%) | Unsuccessful Closure (21%) |
|---|---|---|---|---|---|
| FFY 2020 | | | | | |
| OOS Category 1 | 12,200 | 854 | 7,076 | 1,708 | 2,562 |
| OOS Category 2 | 14,000 | 980 | 8,120 | 1,960 | 2,940 |
| OOS Category 3 | 147 | NA | NA | NA | NA |
| FFY 2021 | | | | | |
| OOS Category 1 | 12,350 | 865 | 7,163 | 1,729 | 2,593 |
| OOS Category 2 | 14,300 | 1,001 | 8,294 | 2,002 | 3,003 |
| OOS Category 3 | 150 | NA | NA | NA | NA |

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

The following shows the amount of time it took from IPE development to successful closure in PY 2018 for consumers in Categories 1 and 2:

- Category 1 717 days/23.5 months
- Category 2 716 days/23.5 months

Wisconsin DVR expects these figures to remain consistent through PY 2021.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

Consumers with the most significant disabilities will be given priority, consumers with significant disabilities will be given second priority, and other eligible consumers with disabilities will be given third priority.

Category 1: A consumer has a most significant disability if a mental or physical impairment seriously limits four or more of the consumer's functional capacities in terms of an employment outcome and the consumer's vocational rehabilitation requires multiple services over an extended period.

Category 2: A consumer has a significant disability if a mental or physical impairment seriously limits one or more of the consumer's functional capacities in terms of an employment outcome and the consumer's vocational rehabilitation requires multiple services over an extended period.

Note: Consumers who receive SSI or SSDI are considered to have at least a significant disability, and therefore placed in Category 1 or 2.

Category 3: Other eligible consumers include those who do not have a disability that seriously limits one or more functional capacities and do not require multiple services over an extended period. Also included in this category are all consumers who do not require multiple services over an extended period.

### 2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

DVR has not elected to serve all eligible individuals regardless of any established OOS.

## N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

### 1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

Three of Wisconsin's priorities pertain to the provision of supported employment services:

- Priority 2: Use and expand on evidence-based practices that advance employment for individuals with the most significant disabilities including Project SEARCH, Individual Placement and Support (IPS), and other programs to increase successful Competitive Integrated Employment (CIE) outcomes.
- Priority 4: To increase statewide outcomes in CIE, collaborate with other partners, including long-term care services, to provide a systematic, braided approach to working with individuals with the most significant disabilities needing additional employment supports.
- Priority 5: Lead an interagency service provider capacity workgroup that includes service providers and representatives from the Wisconsin Departments of Health Services (DHS) and Public Instruction (DPI) to consider options for business models, training, technical assistance, and service provider incentives to increase capacity and options for statewide employment services.

Plans for distributing funds received under Title VI-B for FFY 2020 through FFY 2024 include the following:

- The entire amount of the Title VI-B award is available statewide to provide supported employment services (SES) to consumers with the most significant disabilities – consumers placed in DVR Category 1 – for supports that take place after job hire.
- DVR does not use any of the grant funding for administrative expenses; all grant funds are used to provide direct services.
- DVR will continue to supplement funding of SES with Title IB grant funds to meet additional demand beyond the funds provided in the Title VI-B awards.
- DVR provides fee-for-service, outcome-based payments to non-profit and for-profit rehabilitation entities and other service providers to provide time-limited SES.

- SES are statewide services, meaning DVR has developed service descriptions as part of technical specification documents, including allowable fees for SES.
- Customized employment is available for individuals with a recognized need for long-term support. When a consumer meets customized employment criteria, use of this model requires the service provider to obtain a certificate of customized employment training completion before services are authorized for purchase for the consumer.
- The Individual Placement and Support (IPS) model is expanding in Wisconsin and is now available in 27 of Wisconsin's 72 counties. The model provides employment using evidence-based practices in the treatment of people with serious and persistent mental illness. Wisconsin's IPS model also includes a learning collaborative, which collects data, sets outcome goals, and provides ongoing technical assistance.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

- DVR will continue to use systematic instruction for SES, which will encourage rapid engagement and improved support services. This approach also promotes natural supports, evidence-based practices, and a more rapid and sustainable transition to long-term supports.
- DVR will continue to embrace customized employment as a way to reduce the level of extended services and the time required to provide these services. This approach aims to ensure the sustainability and viability of the long-term care system and DVR's service provider network.
- DVR will review costs associated with providing SES and adjust rates paid to SES providers as needed to address issues with service provider capacity.
- DVR will continue to train staff and service providers on the correct use of systematic instruction, customized employment, and IPS.
- Extended services will be provided for up to four years to youth under the age of 25 with the most significant disabilities for whom long-term supports are not yet available.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

- DVR will continue to use systematic instruction for SES, which will encourage rapid engagement and improved support services. This approach also promotes natural supports, evidence-based practices, and a more rapid and sustainable transition to long-term supports.
- DVR will continue to embrace customized employment as a way to reduce the level of extended services and the time required to provide these services. This approach aims to ensure the sustainability and viability of the long-term care system and DVR's service provider network.
- DVR will review costs associated with providing SES and adjust rates paid to SES providers as needed to address issues with service provider capacity.
- DVR will continue to train staff and service providers on the correct use of systematic instruction, customized employment, and IPS.
- Extended services will be provided for up to four years to youth under the age of 25 with the most significant disabilities for whom long-term supports are not yet available.
- DVR will continue to find partnership opportunities with Wisconsin Departments of Health Services (DHS) and Public Instruction (DPI) to continue outreach to transition students with the most significant disabilities who need supported employment as identified in the 2017 Wisconsin Act 178 Competitive Integrated Employment plan.
- DVR will continue to work with schools to offer work experiences to youth with the most significant disabilities while still in high school, ensuring a more favorable employment path for them as they reach adulthood.
- DVR will continue to work collaboratively with DHS to increase statewide supported employment resources for youth with the most significant disabilities. Efforts will focus on:
    - Increasing access to supported employment services (SES) by sustaining current and developing new SES service providers. A workgroup has been formed with DHS and DPI to address service provider capacity.
    - Increasing access to long-term employment supports through DHS.
    - Continuing financial coordination of SES between funding sources including Wisconsin's county-based Family Care program (via Medicaid waiver-approved funds).
- Interagency activities will aim to increase the number of SES fee-for-service providers in targeted areas of the state that provide customized employment services, integrated community-based SES, and long-term employment supports in lieu of center-based extended employment.
- DVR will continue to conduct regular collaborative meetings and activities with sources of long-term support including managed care organizations, self-directed managed care, and county programs to facilitate referrals, improve service coordination, and increase employment outcomes for youth with the most significant disabilities.
- DVR will work more closely with the long-term care community to assist youth with significant disabilities seeking integrated work opportunities in the community. Braiding services and offering a variety of funded services will help individuals with

disabilities achieve successful outcomes, providing opportunities for both long-term care and DVR consumers. DVR has established an ongoing and collaborative relationship with various groups to facilitate communication and coordination of services to mutual consumers. This collaboration has included cross-training, local outreach, and common policy instruction. DVR has also implemented enhanced data collection to better track outcomes and successful closure information within the DVR case management system.

- DVR will continue to promote the "Partnership Plus" opportunities in the Ticket to Work program. DVR will share information with eligible Ticket holders on post-VR services and supports available through assignment of their Ticket to an approved employment network provider.

## O. STATE'S STRATEGIES

### 1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

DVR is primarily responsible for ensuring that services within the Scope of VR Services (34 CFR 361.48) are available to assist eligible individuals with an Individualized Plan for Employment (IPE) in achieving their employment goals. As needed to ensure timely and continuous IPE services, DVR's financial priority is to expend Title I-B operational and discretionary case aid funds on service delivery to DVR program participants over the anticipated term of their service plans. DVR manages its funding, resources, and waitlist through a projection model that weighs each of these factors. The case aids budget is dedicated to continuous and timely support of IPE services.

DVR has shifted to a model with enhanced focus on students, youth, and supported employment to ensure access to VR services for WIOA outreach target populations. Additionally, DVR has implemented student work-based learning technical specifications and fee schedules to better serve youth and students.

Annually, DVR uses a portion of funds for the development and implementation of innovative approaches to expand and improve VR service delivery. Under WIOA, DVR focuses on innovations and expansions that target students, youth, and supported employment populations. After DVR confirms that eligible individuals are adequately supported in their IPE costs, and that Title I-B funds have been used to activate individuals with the most significant and significant disabilities from the OOS waitlist in a timely manner, up to 2% of Title I-B case aids funds may be used for I & E services.

DVR is currently focusing on programs that expand financial literacy, job development in rural areas, youth services, and underserved populations. DVR has developed self-advocacy skills training as a Pre-Employment Transition service. This is a valuable service for students with disabilities, and as such, DVR will continue to expand the service to all students with disabilities in Wisconsin. If resources do not allow contracted services to be developed, DVR will consider developing peer mentors.

DVR is currently developing a pilot program in partnership with secondary and post-secondary schools that ensures that students with disabilities in the local area that will be pursuing post-secondary education are connected to the disabled student services programs at their colleges before the first day of classes. This will ensure that any reasonable accommodation needs are met before course works starts to maximize the potential for student success.

Potentially Eligible students may receive Pre-Employment Transition Services in the same manner as DVR eligible students. Therefore, they can receive services in all five Pre-Employment Transition Services categories. Every Pre-Employment Transition Service is available to both potentially eligible and eligible students. If a potentially eligible student requires services beyond those in the five Pre-Employment Transition Services categories, they are encouraged to apply for VR services.

The 2017 Wisconsin Act 178 on Competitive Integrated Employment (CIE) for individuals with disabilities has increased DVR's partnership with the Wisconsin Departments of Health Services (DHS) and Public Instruction (DPI). The most significant issues facing Wisconsin in terms of providing supported employment services are service provider capacity, a lack of systematic fee structure that meets the funding needs of providers, and increasing demand for supported employment services, particularly in rural areas. As part of the interagency CIE effort, DVR is leading a workgroup of supported employment stakeholders to address these issues. Additionally, a CIE team comprised of DVR, DHS, and DPI staff and a CIE leadership team meet monthly to implement the law.

One of the major needs in AT is to disseminate comprehensive information to VR consumers and staff about techniques, devices, and services that have been effective in helping consumers achieve employment outcomes.

DVR has a statewide team, AsTec, that consists of at least one person from each of DVR's Workforce Development Areas (WDAs). The AsTec team exists primarily as a group of subject matter experts to assist DVR staff by examining policy, making recommendations, completing case consultations, and developing DVR staff training.

Additionally, a staff guidance piece was developed to clarify common AT language and statewide technical specifications for providers, reiterate DVR's policy that AT should be used throughout the VR process, review the proper method of AT purchasing, and provide access to AT resources and references. Current DVR policy states that AT needs are assessed and provided throughout the VR process. Ensuring that AT is available to VR consumers is a top priority and a vital link to successful employment outcomes.

## 2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

One of the major needs in AT is to disseminate comprehensive information to VR consumers and staff about techniques, devices, and services that have been effective in helping consumers achieve employment outcomes.

DVR has a statewide team, AsTec, that consists of at least one person from each of DVR's Workforce Development Areas (WDAs). The AsTec team exists primarily as a group of subject matter experts to assist DVR staff by examining policy, making recommendations, completing case consultations, and developing DVR staff training.

Additionally, a staff guidance piece was developed to clarify common AT language and statewide technical specifications for providers, reiterate DVR's policy that AT should be used throughout the VR process, review the proper method of AT purchasing, and provide access to AT resources and references. Current DVR policy states that AT needs are assessed and provided throughout

the VR process. Ensuring that AT is available to VR consumers is a top priority and a vital link to successful employment outcomes.

### 3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

DVR will continue to prioritize outreach and service delivery to unserved or underserved populations. DVR's Comprehensive Statewide Needs Assessment (CSNA) identified individuals who are Hmong, Native American, and LBGTQ as underserved.

The CSNA identified language barriers as a top concern to accessing employment. To address this barrier, DVR has identified its vital documents, and these have been made available in Spanish and Hmong, and as appropriate in alternate formats, including large print, audio, or braille. DVR also has statewide contracts with vendors to provide translation services for many other languages (e.g., Russian, Albanian, Italian). DVR continues to monitor its publications and other information to ensure the list of vital documents remains current and that information that is needed to access services is available in other languages and in alternate formats.

DVR has also made it a priority to hire staff from diverse backgrounds and has been able to offer several bilingual staff members higher wages commensurate with this skill set. When DVR does not have access to a staff member who is fluent in the native language of the consumer, DVR uses language translation services as needed. Additionally, DVR has a staff person assigned as Limited English Proficiency (LEP) Coordinator. DVR acknowledges the requirements under GEPA Section 427 and the need to offer equitable access for participation in DVR program service delivery for individuals with special needs.

To improve service delivery and successful employment outcomes for DVR minority consumers served, DVR will use the following strategies:

- Enhance partnerships with community organizations
- Provide cultural training to DVR staff
- Incorporate trauma informed care principles into DVR policy and practices with staff and service providers
- Conduct focus groups targeting low-income urban communities to gain understanding of barriers to receiving services
- Explore new service delivery models to improve access to DVR services and increase successful employment outcomes

DVR will continue to provide pass-through funds to GLITC as identified in the state budget under an agreement to improve VR services to Native Americans with disabilities in Wisconsin. The agreement will identify activities and services supported by the funding and outline parameters for the collaborative partnership between DVR and Section 121 programs for serving Native American tribal members who are eligible for VR services. IPEs may be jointly developed with the input of the consumer, Native American VR staff, and DVR staff. Additionally, DVR has reached out to students who are Native American tribal members to participate in Pre-Employment Transition Services, particularly summer employment programs. DVR will continue this outreach to increase the number of students who are tribal members participating in these programs.

DVR has employed several initiatives to serve the state's rapidly increasing Latino/Hispanic populations. In Milwaukee, DVR is co-located in a Wisconsin Job Center operated by UMOS, a Latino human service organization. DVR and UMOS staff collaborate in service delivery to W-2 recipients with disabilities and on disability-related access issues for the unique services provided by each agency. Other DVR offices throughout the state have also hired bilingual counselors, with the goal to increase and improve outreach and service delivery in the three largest Latino/Hispanic communities in Wisconsin.

DVR continues to strengthen employment linkages for high school students in Milwaukee by maintaining DVR's local employment-focused collaboration with the Milwaukee Public School District, local partners, and private sector employers. Milwaukee is the highest population center in Wisconsin and has the highest population of minority groups.

The CSNA identified consumers who are African American and Latino/Hispanic as having less favorable employment outcomes and lower rates of postsecondary training completion than other consumer demographics. DVR plans to address this issue by conducting a study on racial case disparities and using the existing disparities identified to inform options to maximize equity.

DVR will continue outreach through schools, managed care organizations, community partners, and advocates to encourage those with the most significant disabilities to apply to for services. The 2017 Wisconsin Act 178 on Competitive Integrated Employment (CIE) requires the Wisconsin Departments of Health Services and Public Instruction to collaborate with DVR to increase the number of individuals with the most significant disabilities working in Wisconsin.

Activities that have been identified center around the following goals:

- Increase awareness that work is possible for people with disabilities by promoting CIE opportunities using targeted outreach and education
- Prepare students for CIE through their educational experience, connecting individuals to vital services both during and after high school

As part Wisconsin's CIE plan, one of DVR's goals is to prepare students for community employment through their educational experience, by connecting individuals to services both during and after high school:

- Revising the statewide Youth and Adult Transition Action Guides (TAGs) to include collaboration between the three Departments and practical guidance on preparing students and adults for CIE.
- Developing and carrying out a strong plan for professional, cross-agency development that includes both in-person training and technical assistance, including online resources, including the following:

1. Joint trainings to address issues including provider capacity and best practices in serving common individuals.
2. A service provider capacity workgroup led by DVR that includes service providers and representatives from DHS and DPI to consider options for business models, training, technical assistance, and service provider incentives.

- Showcase schools and programs in the state that are effective in connecting students to early work experiences through collaboration between local school districts and DVR staff.

- Develop and share resources that inform stakeholders such as Aging and Disability Resource Centers (ADRCs), long-term support professionals, DVR counselors, and educators about community services and supports available to the students they serve during and after high school.

1. Post the plan and report and share resources on DHS, DPI, and DVR's implementation of 2017 Wisconsin Act 178 on the joint CIE website, available at https://dwd.wisconsin.gov/dvr/partners/cie/.
2. Assign committed staff from DHS, DPI, and DVR to participate in the Wisconsin Community on Transition (WiCoT).
3. Build a collaborative relationship between DVR's Statewide Transition Action and Resource Team (START), DHS Children's Waiver staff, and DPI Transition Incentive Grant (TIG) staff. This collaboration will ensure continued access to resources for students and families to promote advocacy for CIE experiences while in school and as transition-age youth within schools. DVR and DHS (e.g., Work Incentive Benefits Counseling and opportunities for work experiences) share these resources at the local level when staff identify students and families who could benefit from them.

To facilitate the transition of students with disabilities from school to receiving VR services in FFY 2020-24, DVR will:

- Continue to assign counselors to each school district (or school building) as identified by DPI. The assigned liaison counselors provide outreach, technical assistance, information, and referral to secondary education officials in their assigned schools and districts and assure direct services are provided to eligible youth.
- The role of DVR START, supported by the interagency agreement, is to improve consistency and engagement in the transition process. DVR START and DPI TIG staff also collaborate to improve service consistency for youth with disabilities as they transition from school to post high school activities that include VR services. TIG provides technical assistance to school districts, CESAs, and county Transition Advisory Councils, including information dissemination and participation in staff development activities.
- The Interagency Agreement also supports DPI TIG, which collaborates with DVR START to provide training on the Interagency Agreement. DVR will continue to work closely with school staff to provide CIE opportunities for Wisconsin students. Schools will retain their current responsibilities to serve students with disabilities under IDEA, but with the new law, DVR has become an enhanced partner, providing additional services and supports to increase the employment outcomes for students with disabilities.
- DVR will partner with DPI and DHS to update the Interagency Agreement. DVR will continue to use this agreement as the official document to guide coordination of transition activities with education officials, long-term care, and employment support providers for youth with disabilities as they move from school to post-high school VR services.
- DVR will update and promote the TAG to complement the Interagency Agreement. The TAG details and supports the interagency coordination processes and procedures to deploy the supports and activities necessary for DVR-eligible youth to successfully transition from school to post-high school employment. The TAG includes policy information, definitions, timelines, and examples of effective practices.

- When there is an overlap in educational and employment/rehabilitation goals and services, cost sharing may be negotiated between DVR, the school district, and long-term care or mental health programs. The TAG is the tool used to help make those braided funding decisions. To know who will pay for a service, all parties must be involved in transition planning to determine appropriate services. Staff of all three potential funding sources (DVR, DPI, and DHS) are trained to use the decision-making process outlined in the TAG.
- DVR will continue to be part of the Wisconsin Community of Practice on Transition. This is an interagency collaboration that includes partners from DVR, DPI, DHS, BPDD, WI FACETS, WSPEI, UW Waisman Center, Wisconsin Technical Colleges, and parents. The mission of the collaboration is to bring stakeholders together to impact policies, practices, and outcomes for youth with disabilities in transition to adult life.
- DVR has started developing a peer mentoring program pilot to assist students with disabilities in postsecondary education settings to more easily adjust to the academic and social demands of college.

DVR actively works with Community Rehabilitation Programs (CRPs) to identify new services or patterns of services and improved payment methods. Based on feedback from the Wisconsin Rehabilitation Council (WRC), VR counselors, service providers, and consumers, DVR has identified a need to improve job development and supported employment service delivery for consumers with the most significant disabilities and multiple barriers to placement.

DVR continues to use technical specifications and fee schedules provided by CRPs including:

- Student work-based learning
- Job development
- Supported employment
- Job coaching
- Benefits analysis
- Vocational evaluation

Additionally, DVR conducts regular meetings with vendors of these services for feedback, clarification, ongoing compliance, and service improvement. Statewide trainings were provided to CRPs and other service providers on several topics including customized employment, supported employment, systematic instruction, and trauma informed care.

Each WDA has regular meetings with their service providers to give updates and provide information. DVR has developed a service provider workgroup with representation from several agencies to increase communication and collaboration. Topics this group discusses and advises on include technical specifications, fees, and barriers to service delivery.

The most significant issues facing Wisconsin in terms of providing supported employment services are service provider capacity, a lack of systematic fee structure that meets the funding needs of providers, and increasing demand for supported employment services, particularly in rural areas. To address these issues, DVR is leading a workgroup including supported

employment stakeholders to develop a strong and effective service provider network in Wisconsin.

## 4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

As part Wisconsin's CIE plan, one of DVR's goals is to prepare students for community employment through their educational experience, by connecting individuals to services both during and after high school:

- Revising the statewide Youth and Adult Transition Action Guides (TAGs) to include collaboration between the three Departments and practical guidance on preparing students and adults for CIE.
- Developing and carrying out a strong plan for professional, cross-agency development that includes both in-person training and technical assistance, including online resources, including the following:

1. Joint trainings to address issues including provider capacity and best practices in serving common individuals.
2. A service provider capacity workgroup led by DVR that includes service providers and representatives from DHS and DPI to consider options for business models, training, technical assistance, and service provider incentives.

- Showcase schools and programs in the state that are effective in connecting students to early work experiences through collaboration between local school districts and DVR staff.
- Develop and share resources that inform stakeholders such as Aging and Disability Resource Centers (ADRCs), long-term support professionals, DVR counselors, and educators about community services and supports available to the students they serve during and after high school.

1. Post the plan and report and share resources on DHS, DPI, and DVR's implementation of 2017 Wisconsin Act 178 on the joint CIE website, available at https://dwd.wisconsin.gov/dvr/cie/.
2. Assign committed staff from DHS, DPI, and DVR to participate in the Wisconsin Community on Transition (WiCoT).
3. Build a collaborative relationship between DVR's Statewide Transition Action and Resource Team (START), DHS Children's Waiver staff, and DPI Transition Incentive Grant (TIG) staff. This collaboration will ensure continued access to resources for students and families to promote advocacy for CIE experiences while in school and as transition-age youth within schools. DVR and DHS (e.g., Work Incentive Benefits Counseling and opportunities for work experiences) share these resources at the local level when staff identify students and families who could benefit from them.

To facilitate the transition of students with disabilities from school to receiving VR services in FFY 2020-24, DVR will:

- Continue to assign counselors to each school district (or school building) as identified by DPI. The assigned liaison counselors provide outreach, technical assistance, information, and referral to secondary education officials in their assigned schools and districts and assure direct services are provided to eligible youth.
- The role of DVR START, supported by the interagency agreement, is to improve consistency and engagement in the transition process. DVR START and DPI TIG staff also collaborate to improve service consistency for youth with disabilities as they transition from school to post high school activities that include VR services. TIG provides technical assistance to school districts, CESAs, and county Transition Advisory Councils, including information dissemination and participation in staff development activities.
- The Interagency Agreement also supports DPI TIG, which collaborates with DVR START to provide training on the Interagency Agreement. DVR will continue to work closely with school staff to provide CIE opportunities for Wisconsin students. Schools will retain their current responsibilities to serve students with disabilities under IDEA, but with the new law, DVR has become an enhanced partner, providing additional services and supports to increase the employment outcomes for students with disabilities.
- DVR will partner with DPI and DHS to update the Interagency Agreement. DVR will continue to use this agreement as the official document to guide coordination of transition activities with education officials, long-term care, and employment support providers for youth with disabilities as they move from school to post-high school VR services.
- DVR will update and promote the TAG to complement the Interagency Agreement. The TAG details and supports the interagency coordination processes and procedures to deploy the supports and activities necessary for DVR-eligible youth to successfully transition from school to post-high school employment. The TAG includes policy information, definitions, timelines, and examples of effective practices.
- When there is an overlap in educational and employment/rehabilitation goals and services, cost sharing may be negotiated between DVR, the school district, and long-term care or mental health programs. The TAG is the tool used to help make those braided funding decisions. To know who will pay for a service, all parties must be involved in transition planning to determine appropriate services. Staff of all three potential funding sources (DVR, DPI, and DHS) are trained to use the decision-making process outlined in the TAG.
- DVR will continue to be part of the Wisconsin Community of Practice on Transition. This is an interagency collaboration that includes partners from DVR, DPI, DHS, BPDD, WI FACETS, WSPEI, UW Waisman Center, Wisconsin Technical Colleges, and parents. The mission of the collaboration is to bring stakeholders together to impact policies, practices, and outcomes for youth with disabilities in transition to adult life.
- DVR has started developing a peer mentoring program pilot to assist students with disabilities in postsecondary education settings to more easily adjust to the academic and social demands of college.

## 5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

DVR actively works with Community Rehabilitation Programs (CRPs) to identify new services or patterns of services and improved payment methods. Based on feedback from the Wisconsin Rehabilitation Council (WRC), VR counselors, service providers, and consumers, DVR has identified a need to improve job development and supported employment service delivery for consumers with the most significant disabilities and multiple barriers to placement.

DVR continues to use technical specifications and fee schedules provided by CRPs including:

- Student work-based learning
- Job development
- Supported employment
- Job coaching
- Benefits analysis
- Vocational evaluation

Additionally, DVR conducts regular meetings with vendors of these services for feedback, clarification, ongoing compliance, and service improvement. Statewide trainings were provided to CRPs and other service providers on several topics including customized employment, supported employment, systematic instruction, and trauma informed care.

Each WDA has regular meetings with their service providers to give updates and provide information. DVR has developed a service provider workgroup with representation from several agencies to increase communication and collaboration. Topics this group discusses and advises on include technical specifications, fees, and barriers to service delivery.

The most significant issues facing Wisconsin in terms of providing supported employment services are service provider capacity, a lack of systematic fee structure that meets the funding needs of providers, and increasing demand for supported employment services, particularly in rural areas. To address these issues, DVR is leading a workgroup including supported employment stakeholders to develop a strong and effective service provider network in Wisconsin.

## 6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

DVR continues to gather baseline data for performance metric reporting for most measures. In March 2020 DVR negotiated a performance level of 40.0% for Measurable Skills Gain for PY2020 and 41% for PY2021.

Wisconsin established the WIOA Performance Advisory Committee (PAC), comprised of representatives from each WIOA core partner program including representatives from local workforce development agencies. The WIOA PAC has the goal of monitoring statewide performance data to provide recommendations to the WIOA Leadership Team. Recommendations include performance accountability implementation, shared performance, and continuous improvement activities. WIOA PAC supports key operational and implementation principles of aligned programs through unified strategic planning and shared governance, and assisting state and local areas to promote accountability and transparency.

In preparation for these new reporting measures, DVR developed a dashboard report that offers information on Wisconsin's performance in the measures. These reports mimic the RSA Dashboard Report that RSA shares with states quarterly. In addition to allowing Wisconsin to see the data in real time, having this new dashboard report has allowed Wisconsin to identify a data reporting error and correct it. It is a good way to compare and validate RSA and Wisconsin's performance.

The new metrics are reflected in annual DVR staff performance goals. Target goals and results can be for individuals and Workforce Development Areas as a whole. This engages staff in the process.

In the Fall of CY 2018, WINTAC conducted regional trainings in Wisconsin to educate DVR staff on the new metrics and answer questions. In the Fall of CY 2019, DVR Policy Analysts conducted similar regional training to further educate staff on how to enter data into the IRIS Case Management System to allow for meaningful reporting of Wisconsin's performance. DVR has also updated existing policies and guidance to reflect the new measures, data requirements, and documentation requirements.

DVR is performing data evaluation on youth services and outcomes to gain a better understanding of how to better serve this population. DVR has also requested technical assistance from Project E3 to assess communities in Milwaukee identified by the Project to obtain additional data, which will inform new service strategies in those communities to lessen or remove barriers to participation in the VR program. These efforts aim to improve sustainable employment outcomes for VR participants living in underserved communities.

The participating partners, in consultation with stakeholders, will look for opportunities to build a "Common Intake" system to support program participants served through "No Wrong Door" using an integrated and interoperable platform in order to:

- Co-manage cases (leveraging resources) as appropriate;
- Make appropriate referrals to core and partner programs;
- Report federal deliverables and evaluate programs; and
- Improve the customer experience.

A common intake approach will reduce costs and improve quality by automating intake and outcome measures as a group of WIOA State Plan partners. Part of this effort will be to combine data to create cross-program reports and an evaluation data-set. The data will assist in evaluating the benefit of programs and enable research to identify effective interventions and successful service strategies. This information will help determine how people with disabilities are being served across the workforce system.

To assure that individuals with disabilities have access to the full range of services provided by the other WIOA partners, DVR has identified strengthening WIOA partnerships as a primary goal. DVR is co-located as a partner in 19 comprehensive "One-stop" Job Centers in Wisconsin, with co-location operating agreements between WIOA partners. In addition to the 19 comprehensive "One-stop" Job Centers, DVR has 22 other service locations throughout Wisconsin.

DVR provides training and technical assistance to "One-stop" Job Center partners in serving individuals with disabilities and developing a greater awareness of programmatic and access needs. DVR has encouraged consumers in job ready status to register with the DWD job seeker

website called Job Center of Wisconsin (JCW) and to use its many job search resources. There is also a link to DVR's website on the JCW website so interested job seekers with disabilities can easily access information about DVR services.

DVR Business Services Consultants (BSCs) encourage businesses to use JCW to connect with qualified job seekers. DVR actively participates with DWD's Division of Employment and Training (DET) in implementing WIOA. The CSNA identified issues with accessibility in some areas, and DVR has begun working with DET to improve access in these areas.

DWD enters into a uniform MOU with the entities that are partners in the one-stop service delivery system under WIOA Title I. The DWD uniform template agreement is used throughout Wisconsin in cooperation with 11 local Workforce Development Boards (WDBs). DVR also enters into an MOU and "One-stop" Job Center operating agreement with each of these WDBs.

DVR's MOU addresses operation of the one-stop service delivery system including a description of services and methods for referrals. DVR works collaboratively with one-stop partners on common intake, interagency referrals, business development, and to facilitate job placement with employers. Through DWD's MOUs with one-stop partners, Job Center Network, and WDBs, the requirements of 34 CFR Part 361.23(b) are satisfied.

DVR also has an agreement with DOL-funded Veterans services program to coordinate services for common customers and to deliver quality services for veterans with disabilities. DVR has a data sharing agreement with the DOL-Work Opportunities Tax Credit (WOTC) program administered by DWD. The agreement allows DVR to validate DVR-served employees as WOTC program-eligible so their employers may claim the tax credit. DVR and WOTC staff will conduct routine joint training to enhance use of the tax credit with job placement service providers and employers. Local DVR directors will work jointly with local WDA and DOC staff to expand a current initiative to place Job Centers in correctional institutions to make workforce programs available to inmates.

Together, DVR and the Division of Employment and Training (DET) staff are also working to expand the "Schedule A" hiring program. Wisconsin has had success with the Schedule A program and feels there are additional opportunities to be developed. Finally, DVR WDA Directors are appointed members of the WDBs and are directly involved in WDB program planning.

A joint committee comprised of the WIOA core and partner programs is being developed to provide business services statewide. The Unified Business Services Committee will hold recommending authority for statewide business service policy implementation for the Combined State Plan and is responsible for business service delivery throughout Wisconsin. The committee is also responsible for the WIOA Primary Indicators of Performance (effectiveness in serving employers) and other programmatic responsibilities. One of DVR's roles on this committee is to ensure that employers are educated on hiring individuals with disabilities to meet their workforce needs.

Local areas also have regional business services teams that include local representatives from WIOA titles and other community partners that work with employers. DVR partners with WIOA Title I to represent people with disabilities, engaging in shared documentation practices and collaborating on statewide opportunities for employers.

DVR will explore resources such as the Youth Technical Assistance Center (Y-TAC) and possibly the Targeted Communities Technical Assistance Center (TC-TAC) to see if there is technical assistance available to help analyze current processes for outreach and services for foster care

and juvenile justice youth. The Y-TAC and TC-TAC may also help DVR to assess current staff competencies and capacity to serve this population to determine next steps.

DVR Leadership and the Department of Children and Families (DCF) meet monthly to discuss collaboration. The two agencies recently signed a Memorandum of Agreement and developed a joint training for staff. The next item to be discussed with DCF is a possible collaboration with DVR and the WIOA Title I Youth Program to identify methods and processes to ease the transition of youth with disabilities from juvenile to adult support systems. This includes identifying opportunities for braided funding, co-enrollment, and blended services.

## 7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

The participating partners, in consultation with stakeholders, will look for opportunities to build a "Common Intake" system to support program participants served through "No Wrong Door" using an integrated and interoperable platform in order to:

- Co-manage cases (leveraging resources) as appropriate;
- Make appropriate referrals to core and partner programs;
- Report federal deliverables and evaluate programs; and
- Improve the customer experience.

A common intake approach will reduce costs and improve quality by automating intake and outcome measures as a group of WIOA State Plan partners. Part of this effort will be to combine data to create cross-program reports and an evaluation dataset. The data will assist in evaluating the benefit of programs and enable research to identify effective interventions and successful service strategies. This information will help determine how people with disabilities are being served across the workforce system.

To assure that individuals with disabilities have access to the full range of services provided by the other WIOA partners, DVR has identified strengthening WIOA partnerships as a primary goal. DVR is co-located as a partner in 19 comprehensive "One-stop" Job Centers in Wisconsin, with co-location operating agreements between WIOA partners. In addition to the 19 comprehensive "One-stop" Job Centers, DVR has 22 other service locations throughout Wisconsin.

DVR provides training and technical assistance to "One-stop" Job Center partners in serving individuals with disabilities and developing a greater awareness of programmatic and access needs. DVR has encouraged consumers in job ready status to register with the DWD job seeker website called Job Center of Wisconsin (JCW) and to use its many job search resources. There is also a link to DVR's website on the JCW website so interested job seekers with disabilities can easily access information about DVR services.

DVR Business Services Consultants (BSCs) encourage businesses to use JCW to connect with qualified job seekers. DVR actively participates with DWD's Division of Employment and

Training (DET) in implementing WIOA. The CSNA identified issues with accessibility in some areas, and DVR has begun working with DET to improve access in these areas.

DWD enters into a uniform MOU with the entities that are partners in the one-stop service delivery system under WIOA Title I. The DWD uniform template agreement is used throughout Wisconsin in cooperation with 11 local Workforce Development Boards (WDBs). DVR also enters into an MOU and "One-stop" Job Center operating agreement with each of these WDBs.

DVR's MOU addresses operation of the one-stop service delivery system including a description of services and methods for referrals. DVR works collaboratively with one-stop partners on common intake, interagency referrals, business development, and to facilitate job placement with employers. Through DWD's MOUs with one-stop partners, Job Center Network, and WDBs, the requirements of 34 CFR Part 361.23(b) are satisfied.

DVR also has an agreement with DOL-funded Veterans services program to coordinate services for common customers and to deliver quality services for veterans with disabilities. DVR has a data sharing agreement with the DOL-Work Opportunities Tax Credit (WOTC) program administered by DWD. The agreement allows DVR to validate DVR-served employees as WOTC program-eligible so their employers may claim the tax credit. DVR and WOTC staff will conduct routine joint training to enhance use of the tax credit with job placement service providers and employers. Local DVR directors will work jointly with local WDA and DOC staff to expand a current initiative to place Job Centers in correctional institutions to make workforce programs available to inmates.

Together, DVR and DET staff are also working to expand the "Schedule A" hiring program. Wisconsin has had success with the Schedule A program and feels there are additional opportunities to be developed. Finally, DVR WDA Directors are appointed members of the WDBs and are directly involved in WDB program planning.

A joint committee comprised of the WIOA core and partner programs is being developed to provide business services statewide. The Unified Business Services Committee will hold recommending authority for statewide business service policy implementation for the Combined State Plan and is responsible for business service delivery throughout Wisconsin. The committee is also responsible for the WIOA Primary Indicators of Performance (effectiveness in serving employers) and other programmatic responsibilities. One of DVR's roles on this committee is to ensure that employers are educated on hiring individuals with disabilities to meet their workforce needs.

Local areas also have regional business services teams that include local representatives from WIOA titles and other community partners that work with employers. DVR partners with WIOA Title I to represent people with disabilities, engaging in shared documentation practices and collaborating on statewide opportunities for employers.

DVR will explore resources such as the Youth Technical Assistance Center (Y-TAC) and possibly the Targeted Communities Technical Assistance Center (TC-TAC) to see if there is technical assistance available to help analyze current processes for outreach and services for foster care and juvenile justice youth. The Y-TAC and TC-TAC may also help DVR to assess current staff competencies and capacity to serve this population to determine next steps.

DVR Leadership and the Department of Children and Families (DCF) meet monthly to discuss collaboration. The two agencies recently signed a Memorandum of Agreement and developed a joint training for staff. The next item to be discussed with DCF is a possible collaboration with DVR and the WIOA Title I Youth Program to identify methods and processes to ease the transition of youth with disabilities from juvenile to adult support systems. This includes identifying opportunities for braided funding, co-enrollment, and blended services.

## 8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

### A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

DVR will regularly review past and current data, policy, and procedures to assist in achieving goals and priorities. Statewide teams, including START and the DVR Policy Academy, provide feedback related to policy and procedures. DVR is also in the process of hiring a full-time Quality Assurance Analyst to lead activities and assist to improve services and outcomes for the individuals we serve. All DVR staff also have access to a data dashboard that provides just-in-time data, including progress metrics and other information pertinent to DVR programs and those we serve. DVR managers continually review the dashboard to assist staff and make policy revisions and recommendations.

Obtaining feedback from WRC, consumers, staff, partners, and other stakeholders on policy, procedures, and service delivery is another strategy to achieve DVR's goals. This has been accomplished through focus groups, stakeholder input sessions, public hearings, public comments, and surveys.

Decreasing staff turnover is a priority that was noted throughout the CSNA. High staff turnover experienced in the last few years affected the agency's ability to provide consistent, high-quality services to our consumers. DVR has seen a decrease in turnover over the last year due to the implementation of several strategies, and these successful efforts have continued, particularly those addressing pay equity.

Below are the strategies that will be used to address each of the priorities identified in Section L using information gathered in the Comprehensive Statewide Needs Assessment.

<u>Priority 1</u>: Transition DVR to a caseload focused on youth and individuals with the most significantly disabilities to ensure that all individuals with disabilities who want to work can share their unique talents with their communities and the workforce. Use Pre-Employment Transition Services to allow students the opportunity to explore and gain experience in CIE.

- Update Interagency agreements with Department of Public Instruction (DPI) and Department of Health Services (DHS).

- Update and promote the use of the Transition Action Guide as included in the interagency agreement between DHS, DVR, and DPI to define roles for DVR and the LEA during IEP development.
- Maintain and expand Project SEARCH.
- Showcase schools and programs in the state that are effective in connecting students to early work experiences through collaboration between local school districts and DVR staff.
- Develop and share resources that inform stakeholders such as Aging and Disability Resource Centers (ADRCs), long-term support professionals, DVR counselors, and educators about community services and supports available to the students they serve during and after high school.
- Build a collaborative relationship between DVR's Statewide Transition Action and Resource Team (START), DHS Children's Waiver staff, and DPI Transition Improvement Grant (TIG) staff.
- Explore use of technical assistance to help analyze current processes and staff competencies for providing services for youth in the foster care and juvenile justice systems.
- Collaborate with DCF to improve youth in the foster care and juvenile justice systems.

Priority 2: Use and expand on evidence-based practices that advance employment for individuals with the most significant disabilities including Project SEARCH, Individual Placement and Support (IPS), and other programs to increase successful CIE outcomes.

- Promote the use of National Clearinghouse of Rehabilitation Training Materials (NCRTM) website hosted by Utah State University is available from the DVR's internal Training Opportunities page.
- Share research information disseminated through teleconferences and webinars sponsored by RSA and the national network of disability research and training entities.
- Use research findings to strengthen service quality efforts through the work of the Policy Academy and other staff to inform agency changes and improvements.
- Disseminate web training resources via our internal website and email communications such as research findings are made available through the dissemination of published materials, access to webinars and onsite training sponsored by leading Rehabilitation Research and Training Centers (RRTCs).
- Share research and practice-based publications from the Institute on Rehabilitation Issues (IRI monographs) with DVR staff and management.
- Participate in training seminars and webinars sponsored by RSA.
- Continue to emphasize the need to use and apply research when developing guidance, best practices, and staff trainings.

Priority 3: Improve services and outcomes for underserved populations by providing education and training, developing work skills, and creating employment connections. Target outreach to

community organizations serving minority individuals to ensure access to and awareness of DVR services in these communities.

- Cultural training to DVR Staff on underserved populations, including Hmong, Native American, and LBGTQ.
- Hire employees from communities that are identified as underserved populations.
- Enhance partnerships and targeted outreach with community organizations.
- Incorporate trauma informed care principles into DVR policy and practices with staff and service providers.
- Implement recommendations from focus groups that were held in PY 2019 targeting low-income urban communities to gain understanding of barriers to receiving services.
- Explore new service delivery models to improve access to DVR services and increase successful employment outcomes.
- Conduct study on racial disparities and related to employment outcomes and post-secondary training.

Priority 4: To increase statewide outcomes in CIE, collaborate with other partners, including long-term care services, to provide a systematic, braided approach to working with individuals with the most significant disabilities needing additional employment supports.

- Update Adult Technical Assistance Guide and provide training to staff and other stakeholders.
- Improve access to supported employment services and long-term employment supports through financial coordination of these services, and service provider quality and capacity.
- Train DVR staff and service providers on Systematic Instruction.
- Expand Customized Employment as a service statewide.
- Promote Partnership Plus opportunities in the Ticket to Work program.

Priority 5: Lead an interagency service provider capacity workgroup that includes service providers and representatives from the Wisconsin Departments of Health Services (DHS) and Public Instruction (DPI) to consider options for business models, training, technical assistance, and service provider incentives to increase capacity and options for statewide employment services.

- Lead service provider capacity workgroup that includes service providers and representatives from DHS and DPI to improve quality, identify needs, provide adequate funding, and increase collaboration between partners.
- Develop and carry out a strong plan for professional, cross-agency development that includes both in-person training and technical assistance, including online resources.
- Provide joint trainings with DHS and DPI to address issues including service provider capacity and best practices in serving common individuals.

Priority 6: Provide training to DVR staff and service providers to ensure they are aware how to best serve individuals with substance use and mental health disabilities, two populations that are increasingly seeking DVR services. Continue to expand collaboration efforts with the DHS Division of Care and Treatment Services to include Individual Placement and Support (IPS) to improve employment outcomes for DVR consumers with mental health disabilities.

- Continue to explore opportunities for expansion of Individual Placement and Support (IPS) services for youth and adults via Medicaid waiver-approved funds.
- Provide DVR staff training on topics related to mental health and opioid addiction.

Priority 7: Continue to operate the DVR Business Services Initiative with 12 Business Services Consultants (BSCs) working with regional Business Service Teams, conducting outreach to businesses to identify their talent needs, developing partnerships, and offering technical assistance to workforce partners and businesses on the ADA and accommodations for people with disabilities to increase employment outcomes.

- Participate in the DWD Unified Business Services Committee.
- Provide training for BSCs (and other staff), including cultural competencies of underserved populations and disability awareness training.
- Offer presentations facilitated by DVR BSCs at regional transition team meetings and statewide transition conferences covering a variety of topics including best practices in providing business outreach, sector strategies, and emerging business and economic trends.

Priority 8: Expand collaborative partnerships with WIOA partners by providing staff cross-training on programs and technical assistance on how to effectively work with individuals with disabilities to increase co-enrollment and braided funding. Work with WIOA Title III to ensure assistive technology (AT) is available in Job Centers for individuals who require AT equipment to access Job Center services.

- Participate in BSC training with WIOA Title partners, including DWD's Division of Employment and Training, and share the importance of WIOA Titles working together to provide seamless access to business services.
- Expand Schedule A hiring program.
- Build a "Common Intake" system to support program participants served through "No Wrong Door" using an integrated and interoperable platform to co-manage cases, leveraging resources as appropriate.
- Provide cross-program training for WIOA partners.
- Develop a mechanism for appropriate referrals to WIOA and non-WIOA partners.
- Combine data to create cross-program reports and an evaluation dataset.
- Collaborate and coordinate with partners on transportation.

Priority 9: Increase education and training in skilled occupations, including STEM careers, to improve employment outcomes resulting in self-supporting wages and opportunities for consumers to work in diverse workforce sectors.

- Encourage Career Pathways with consumers, including informing staff of Career Pathway options.
- Provide career exploration activities to consumers in skilled and STEM occupations.
- Provide Counselors on STEM Careers 101 training including provide LMI information on STEM Careers in Wisconsin to staff.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Currently, DVR is not anticipating the use of Innovation and Expansion funds to support Wisconsin's SRC or SILC activities.

DVR has a history of implementing evidence-based practices and projects into our services. DVR continues to seek out this information and pilot new projects to improve DVR's effectiveness in assisting consumers to reach their employment goals.

DVR will continue to develop partnerships with other agencies and programs to assist in serving students, underserved populations, and individuals with the most significant disabilities. This will increase the impact of DVR's outreach efforts, providing greater understanding of needs and leveraging agency resources.

DVR will continue to collaborate with WIOA partners to assist individuals with disabilities served throughout the workforce system. To more effectively serve individuals with disabilities, key focus areas will include data sharing and integration, common intake, Wisconsin Job Center service accessibility, and technical assistance to partners.

As a WIOA partner, DVR will continue to participate in statewide business services teams. It is important that DVR BSCs are involved in these teams to ensure job seekers with disabilities are represented in the development of strategies to meet the needs of Wisconsin employers. DVR's CSNA identified that employers in Wisconsin need education about individuals with disabilities and their many skills and abilities that add value to the workforce.

The 2017 Wisconsin Act 178 on Competitive Integrated Employment (CIE) identified DVR as the lead agency on activities outlined in the law, which focuses on increasing CIE opportunities for individuals with disabilities. In collaboration with DHS and DPI, DVR will oversee CIE plan implementation, which includes addressing service provider capacity and quality concerns.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

See Section o. 8. A.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

DVR identified a single priority and eight programmatic goals in the most recent, 2016 State Plan.

Priority: DVR assists eligible individuals, including individuals with a significant disability, to obtain, maintain, or advance in high-quality employment.

Programmatic Goal 1: Transition DVR to a caseload focused on youth and individuals with the most significant disabilities to ensure that all individuals with disabilities who want to work can share their unique workforces with their communities and the workforce.

Achieved based on participation in Pre-Employment Transition Services of youth and individuals with most significant disabilities.

PY 2018: 4,113 consumers

PY 2019: 4,430 consumers

Programmatic Goal 2: Transition DVR to an outreach model to encourage students with disabilities to seek services and obtain the career and employment supports they need to help with their postsecondary employment success.

Achieved based on participation in Pre-Employment Transition Services Post-Secondary Counseling of youth and individuals with most significant disabilities.

PY 2018: 29 consumers

PY 2019: 55 consumers

Programmatic Goal 3: Use evidence-based practices that advance the employment of individuals with the most significant disabilities who may need additional supports.

Achieved based on increasing levels of participation in IPS and CE.

PY 2018: 87 participants in IPS, 14 in CE

PY 2019: 119 in IPS, 33 in CE

Programmatic Goal 4: Provide targeted counseling and enriched information on the benefits of work to consumers who rely on public benefits.

Achieved based on participation in Work incentive Benefits counseling.

PY 2018: 2,805 participated in Work Incentive Benefits Analysis

PY 2019: 2,927 participated in Work Incentive Benefits Analysis

Programmatic Goal 5: Meet and exceed the expenditure requirement under WOIA requiring at least 50 percent of supported employment funds on youth with the most significant disabilities.

Goal achieved in PY 2018 and 2019, as DVR used at least 50 percent of supported employment funds on youth with the most significant disabilities.

Programmatic Goal 6: Collaborate with other partners, especially long-term care providers, to develop a braided approach to working with individuals with the most significant disabilities who may need additional employment supports.

Achieved based on participation of individuals with long term care.

PY 2018: 333 participants had identified long term supports

PY 2019: 339 participants had identified long term supports

Programmatic Goal 7: Continue to operate the DVR Business Services Initiative with 20 business services consultants working with regional workforce business service teams, conducting outreach to businesses to identify their workforce needs, and offering technical assistance to workforce partners and businesses on ADA and accommodations for people with disabilities.

Not achieved given a reduction in the number of DVR Business Services staff. Although DVR did reduce the number of BSC from twenty to nine during the most recent state plan time period, DVR was successful in increasing the number of BSCs back to twelve allowing for at least one to cover each workforce development area.

PY 2018: 20 Business Services staff

PY 2019: 12 Business Services staff

Programmatic Goal 8: Increase temporary work, paid internship, and on-the-job training (OJT) opportunities for DVR consumers who are job ready or are transition age at application.

Not-Achieved based on overall participation levels

PY 2018: Pre-ETS/OJT 135 Adults 177

PY 2018: Pre-ETS/Internship 1551 Adults 2603

PY 2019: Pre-ETS/OJT 73 Adults 74

PY 2019: Pre-ETS/Internship 1684 Adults 2563

The following strategies attributed to the achievement of the goals:

- DVR has a VR counselor assigned to every high school in the state. Staff assigned locally take referrals and provide information about DVR services for students including employment and postsecondary options.
- DVR used motivational interviewing, Individual Placement and Support (IPS), and customized employment as evidence-based practices.
- DVR has updated services, guidance, and partnerships to promote benefits analysis services and participation in Ticket to Work with over 12 Partnership Plus agreements.
- DVR has provided a continuum of services for individuals who need short and long-term support services to maintain employment.

- DVR works collaboratively with other state agencies to coordinate services for mutual consumers, analyze and address funding issues, and share data through 2017 Wisconsin Act 178, Wisconsin's Employment First legislation.
- Wisconsin Department of Health Services (DHS) Managed Care has removed waiting lists for long-term supports for those participating in supported employment.
- DVR has increased its use of informational material about short-term employment and training opportunities, and encourages paid work opportunities through OJTs, Student OJTs, and temporary work.
- DVR trained interested service providers in customized employment, supported employment, and trauma informed care.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

- DVR has had difficulty with maintaining our service provider network in supported employment due to economic stress on the part of community rehabilitation programs and staffing vacancies.
- Some DVR service providers have implemented waitlists for services due to capacity issues.
- DVR has experienced an increased need for supported employment services due to a Medicaid initiative for funders of long-term supports that incentivizes applications for DVR services. Sometimes the applicants are not interested in DVR services.
- DVR originally had 20 Business Services Consultants (BSCs) to assist in developing partnerships with employers, but in 2017, the number of positions was reduced to nine. Three additional BSC positions were recently approved, bringing the total number of DVR BSCs in Wisconsin to 12.
- 
- The long-term care system employs several different funding models, and these models do not always incentivize consumers to maximize their work hours (within their disability limitations) or provide stable funding following the close of a DVR case.
- Across the statewide system of employment services for people with disabilities, different language, definitions, and service eligibility criteria are used, creating a barrier to seamless service delivery.
- The need for soft skill preparation to expand employment opportunities has increased statewide.
- Lack of transportation resources impacts the ability of individuals with disabilities to obtain, maintain, or advance in employment, particularly in rural areas of Wisconsin.
- Increased education is needed for the business community on the many benefits of hiring our consumers and individuals with disabilities in general.
- The need to share information about Employment Networks, Partnership Plus, and other work incentives and provide access to benefits counseling has increased to better address the number of consumers experiencing disincentives to full employment.

## 2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

### A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

DVR identified two main category goals for Supported Employment Services (SES) in the most recent State Plan: quality and scope. The number of participants with the most significant disabilities in supported employment for PY 2018 was 750, Individual Placement and Support (IPS) was 87, and Customized Employment (CE) was 14.

In PY 2019, the numbers showed a slight increase in participation overall and a more significant increase in specialized supported employment (e.g., IPS and CE). Supported employment had 749 participants, IPS had 119, and CE had 33.

**A. Identify the strategies that contributed to the achievement of the goals.**

**Quality**

- DVR has strengthened SES service provider training statewide since the last State Plan. DVR provided service provider training related to our services and offered specialized free trainings on customized employment techniques and trauma informed care training. In PY 2019, 41 service providers participated in customized employment training which allowed for increased capacity for the service statewide. Trauma informed care training was provided in 12 locations across the state in PY 2019.
- DVR's service descriptions provide clarity on service provision and reporting for providers.
- In the past year, DVR has updated SES guidance documents for staff and completed training on SES for all staff in PY 20.

**Scope**

- DVR strengthened partnerships and formal agreements with state education and Medicaid agencies.
- DVR strengthened its focus on SES statewide provider service capacity and coordination of services with local teams and long-term support case managers.

### B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

**Quality**

- The longer case length DVR has experienced for consumers receiving SES and the subsequent increased the demand for the delivery of SES services.
- SES provider economic stress and staffing challenges.

**Scope**

- Several providers have waitlists for SES.
- Some of DVR's SES providers are unable to expand services to other communities in need.

- Several of DVR's SES providers struggle to maintain staffing levels.
- DVR has limited SES providers statewide.
- Transportation issues, particularly in rural areas.

### 3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

The WIOA Title IV program did not present expected levels of performance during the PY 2018 and PY 2019 State Plan period consistent with guidance received from RSA.

Levels achieved based on DVR data:

Measurable Skills

PY 2018: 3,675 consumers

PY 2019: 2,153 consumers

Employment Post-Exit Q2

PY 2018: 4,206 Employed Median Wages $2,624

PY 2019: 4,104 Employed Median Wages $2,732

Employment Post-Exit Q4

PY 2018: 3,986 Employed Median Wages $2,773

PY 2019: 3,920 Employed Median Wages $2,739

Credentials Attained

PY 2018: 124 Credentials Attained

PY 2019: 574 Credentials Attained

### 4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

DVR has developed individualized local Pre-Employment Transition Services projects to meet the needs of students. The projects have been developed to meet local needs and labor market factors. These projects are offered primarily during the summer months and are funded with reserved Pre-Employment Transition Services funds. DVR has not reserved funds for other innovation and expansion activities.

## Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

### 1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

***Quality of Supported Employment Services***

DVR has service agreements with providers of the most common VR services, including supported employment. As part of these service agreements, technical specifications are in place which describe the critical elements required to provide all statewide services, including supported employment. These technical specifications include service descriptions, informational materials for consumer use, required reporting templates, and documentation needed for service payment.

The required reporting templates are completed by DVR service providers at the outcome of services, or, in the case of ongoing services, monthly. Points in the process have also been identified where face-to-face meetings or coordinated communication is required. As part of their service agreement, DVR statewide service providers agree that their staff are qualified to provide the services and are expected to complete onboarding and provide all needed training for their staff. Providers of statewide services are vetted every other year by local DVR offices and approved centrally by DVR's Contract Specialist. Issues related to service delivery are handled in coordination with local and statewide staff.

DVR is experiencing several challenges in the delivery of supported employment services. Statewide service providers have struggled to keep job developer and job coach positions filled, resulting in difficulties in training staff and capacity-related wait lists for services.

There are also system-wide logistical and funding issues for supported employment services in Wisconsin. Education and long-term care systems have different funding, eligibility, and reporting requirements, which impacts the ability of service providers to provide seamless service to consumers in supported employment.

To respond to these challenges, DVR has developed several approaches for improved service delivery. DVR's service provider requirements and technical specification reports are undergoing a thorough review and changes will be implemented in SFY 2020 to reduce reporting requirements while still verifying quality and receipt of services. DVR is also researching potential partnerships to develop and deliver supported employment training to statewide service provider staff to meet the ongoing needs of the supported employment workforce.

***Scope of Supported Employment Services***

DVR provides a continuum of services in supported employment. Vocational Rehabilitation services begin as a comprehensive assessment using an interview-based Career Profile. Specialized job development services are then made available to individuals with the most significant disabilities identified as appropriate for supported employment services. Supported Employment services are categorized as services that begin after job placement.

Upon the receipt of an employment offer and completion of a job task analysis, ongoing support services are provided by systematic instruction (job coaching) these are Supported Employment Services. 'Ongoing support services' refers to services provided by DVR for up to 24 months from the time of job placement until transition to Long-Term Support. 'Long-Term Support' refers to services needed to support an individual in employment after the individual has made the transition from ongoing support services provided by DVR.

Challenges exist in delivering the scope of DVR services to consumers, mostly related to the capacity of DVR's network of providers to meet the need for vocational rehabilitation and supported employment services in the state. Traditionally, Community Rehabilitation Providers (CRPs) who offer 14(c) work opportunities have been the primary source of vocational rehabilitation and supported employment services in Wisconsin. As changes have been made to

14(c) programming, however, those providers have experienced financial stress and difficulty maintaining consistent staff to provide community-based employment and long-term supports.

It is also typical for vocational rehabilitation services for individuals with the most significant disabilities to take longer than other job development and placement services, adding further strain to the already stretched capacity of providers to meet the statewide demand, as the longer length of supported employment services requires providers to assign staff to consumers receiving these services for longer periods. This includes extended services for youth with the most significant disabilities under age 25 for a period not to exceed 48 months.

DVR has been working closely with the DVR provider network to more fully understand the issues surrounding sustainability and staffing capacity. In CY 2019, a thorough review and survey of time and costs associated with DVR service delivery was initiated, which will continue through CY 2020. The results of those surveys will inform rate and service changes for all DVR services, with the goal of stabilizing the DVR provider network and workforce.

***Extent of Supported Employment Services***

Wisconsin has 113 supported employment service providers, with each county having at least three providers to choose from. One of Wisconsin's most populated counties has 23 providers available that offer supported employment services.

Service gaps in some areas of the state currently require waitlists for supported employment services. Moreover, the need for supported employment services is expected to increase due to changes in Centers for Medicare & Medicaid Services (CMS) rules, WIOA emphasis on transition services, and changes to 14(c) employment availability. In DVR's Comprehensive Statewide Needs Assessment (CSNA), completed in CY 2019, it was noted that consumers in Wisconsin worked fewer hours in supported employment than in similar states (by population and demographics).

DVR has compiled recommendations and developed a multi-layered approach to improving the availability and quality of these services. The areas identified include:

- Payment
- Communication and Information
- DVR Policy and Service Provider Process
- Training
- Waitlist and Capacity

DVR has also participated in the development of an interagency group to address supported employment service provider quality and capacity across the entire supported employment system, including services before and after DVR services.

DVR recently updated staff guidance to reflect DVR's goal to maximize the number of hours worked in supported employment to up to 40 hours per week based on individual needs. It is important that individuals with the most significant disabilities are provided an opportunity to earn real wages and engage in meaningful competitive integrated employment in their communities.

The Wisconsin Rehabilitation Council (WRC) has recommended that DVR collaborate with all interested stakeholders, including DVR staff, job seekers, service providers, long-term care funders, and advocacy groups to prepare specific strategies to:

- Develop a draft fee schedule based on the true costs incurred by service providers in delivering supported employment services
- Streamline reporting models, methods, and means
- Address DVR staffing inconsistencies between WDA service regions
- Provide timely and consistent communication and interaction with service providers and vendors

DVR is the process of completing a survey to assess the true costs incurred by service providers in the delivery of supported employment services in Wisconsin. DVR is also in process of streamlining service provider reporting requirements. Service provider access to DVR Service Provider Portal is being piloted, which will further streamline processes and procedures for referrals and improve timely communication and service coordination.

***Youth with the Most Significant Disabilities***

In FFY 2018, the most recent reporting period, DVR had 326 youth participate in supported employment services. DVR met the supported employment spending requirement for the reporting period.

DVR appreciates that providing supported employment services to students and youth is challenging and can require complex coordination between DVR staff, schools, families, and long-term care providers. Once a student has identified their long-term employment goal, Pre-Employment Transition Services end and supported employment services begin.

To assist DVR staff in coordinating supported employment services, an updated guidance document was completed in SFY 2019 with examples of approaches to serving youth and students. Additionally, supported employment training is regularly provided as part of DVR staff training. DVR's MOA with the Wisconsin Department of Health Services (DHS) Medicaid agency further delineates roles and responsibilities for services in supported employment.

## 2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

Funding available through long-term care sources must be explored and, when available, used as a comparable benefit. DVR coordinates with Long-Term Support to identify the types of supports needed and when those services should be implemented and identified in consumer service plans. Extended services are only available to youth with the most significant disabilities.

A DVR consumer's Individualized Plan for Employment (IPE) should include progress measures that, once met, will clearly identify when the transition to Long-Term Support should occur. This transition will typically take place once a consumer is stable on a job, has met the IPE progress measures identified by the supported employment team as agreed to in the IPE, and has received the services identified in the IPE.

Transition to Long-Term Support should occur as quickly as possible once the consumer is stable on the job. DVR can provide up to 24 months of ongoing support, though this level of need is rare. The supported employment team should be involved at each step during the supported employment process and work together to reduce the need for job coaching support while maximizing independence. DVR can provide long-term supported employment services for youth with the most significant disabilities under age 25 for a period not to exceed 48 months. DVR cannot provide long-term support services beyond 48 months, and the 48-month limit is a lifetime cap.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Division of Vocational Rehabilition

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Wisconsin Department of Workforce Development

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Delora Newton

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Division Administrator

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

CERTIFICATION SIGNATURE

| Signatory information | Enter Signatory information in this column |
|---|---|
| Name of Signatory | Delora Newton |
| Title of Signatory | Division Administator |
| Date Signed | February 28, 2020 |

ASSURANCES

| The State Plan must include | Include |
|---|---|
| 1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act. | |
| 2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140. | |

| The State Plan must include | Include |
|---|---|
| 3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan: | |
| 3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act | |
| 3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected): | |
| 3.b.(A) "is an independent State commission" (Yes/No) | No |
| 3.b.(B) "has established a State Rehabilitation Council" (Yes/No) | Yes |
| 3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act | |
| 3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3) | |
| 3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No) | No |
| 3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No) | No |
| 3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan | No |
| 3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act | |
| 3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act | |
| 3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act | |
| 3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act | |

| The State Plan must include | Include |
|---|---|
| 3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities | |
| 3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act | |
| 4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will: | |
| 4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act | |
| 4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act | |
| 4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No) | No |
| 4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act | |
| 4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act | |
| 4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act | |
| 4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act | |
| 4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act | |
| 4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs | |
| 4.j. With respect to students with disabilities, the State, | |
| 4.j.i. Has developed and will implement, | |

| The State Plan must include | Include |
|---|---|
| 4.j.i.I. Strategies to address the needs identified in the assessments; and | |
| 4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and | |
| 4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)) | |
| 5. Program Administration for the Supported Employment Title VI Supplement: | |
| 5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act | |
| 5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act | |
| 5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act | |
| 6. Financial Administration of the Supported Employment Program: | |
| 6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act | |
| 6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act | |
| 7. Provision of Supported Employment Services: | Yes |
| 7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act | |
| 7.b. The designated State agency assures that: | |
| 7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of | |

| The State Plan must include | Include |
|---|---|
| the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act | |
| 7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act | |

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Employment (Second Quarter After Exit) | Baseline | Baseline | Baseline | Baseline |
| Employment (Fourth Quarter After Exit) | Baseline | Baseline | Baseline | Baseline |
| Median Earnings (Second Quarter After Exit) | Baseline | Baseline | Baseline | Baseline |
| Credential Attainment Rate | Baseline | Baseline | Baseline | Baseline |
| Measurable Skill Gains | 40.0% | 40.0% | 41.0% | 41.0% |
| Effectiveness in Serving Employers | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] | Not Applicable [1] |

*1*

*"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

## TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

### A. CONDUCT A PROGRAM DESIGNED TO SERVE ALL POLITICAL SUBDIVISIONS IN THE STATE (NOT NECESSARILY IN A UNIFORM MANNER) THAT PROVIDES ASSISTANCE TO NEEDY FAMILIES WITH (OR EXPECTING) CHILDREN AND PROVIDES PARENTS WITH JOB PREPARATION, WORK, AND SUPPORT SERVICES TO ENABLE THEM TO LEAVE THE PROGRAM, SPECIFICALLY CASH ASSISTANCE, AND BECOME SELF-SUFFICIENT (SECTION 402(A)(1)(A)(I) OF THE SOCIAL SECURITY ACT)

Key changes implemented in W-2 Contracts beginning with 2013 include:

- Payments are structured to incentivize W-2 Contractors to prepare and place participants in sustainable jobs.
- Contractors are paid for specific outcomes, as well as for allowable costs.
- Longer contracts between DCF and W-2 Contractors create sustainable and stable long-term program outcomes and strengthen contract relationships.
- Management and oversight of participant cash payments are administered directly by DCF so W-2 Contractors can focus on job activities without the fear of liability for cash payments.
- DCF divided the state into ten geographical areas: four geographical areas in Milwaukee County, and six geographical areas in the Balance of State (BOS). These larger service areas for W-2 Contractors have been established to achieve economies of scale in operations and more cost-effective and efficient program administration.

The 2013-2024 W-2 Contractors for each geographical area are:

- Ross Innovative Employment Solutions in Milwaukee Northern area;
- UMOS, Inc. in Milwaukee Southern area;
- America Works of Wisconsin, Inc. in Milwaukee East Central area;
- MAXIMUS Human Services, Inc. in Milwaukee West Central area;
- ResCare Workforce Services in BOS Southeast area;
- Forward Service Corporation in BOS Southwest area;
- Forward Service Corporation in BOS Northeast area;
- Forward Service Corporation in BOS North Central area;
- Workforce Resource, Inc. in BOS Northwest area; and
- Workforce Connections, Inc. in BOS Western area.

(See map in Appendix 1: W-2 Contractors and Geographical Areas Effective January 1, 2013.)

**W-2 Program Goals and Assumptions**

The primary goals of the W-2 program are to: help eligible parents prepare for, obtain, and keep unsubsidized employment; help parents provide for their families; and become self-sufficient members of the community in which they live. For eligible parents who cannot work for a long period of time due to significant disability, the W-2 program helps the parents apply for and receive Supplemental Security Income (SSI) /Social Security Disability Insurance (SSDI).

W-2 policies are guided by the following basic assumptions:

- Work is the best way for parents to support their families.
- Family income should improve when parents work.
- Consistent work is essential for parents to achieve economic stability.
- W-2-eligible participants are parents as well as job seekers.
- Eligible parents must be willing to participate in work or work-like activities in exchange for W-2 payments.
- Families benefit from participating in W-2.
- W-2 matches the employment needs of parents with the needs of local employers.

(See W-2 Manual Chapter 1.)

**Community Steering Committees**

To strengthen the connection between the employment focus of W-2 and real employment opportunities in local areas, Wisconsin requires its contracted W-2 agencies to establish Community Steering Committees to identify and encourage employers to create work-experience opportunities, subsidized employment opportunities, and permanent unsubsidized jobs for W-2 participants. W-2 agencies are required to appoint to the committees at least one representative of business interests, and each county served by the W-2 agency must be represented on a steering committee by a member of the business community in that county or by a person from a city or county economic development department in that county. These committees are required to coordinate with local workforce investment boards and must appoint a chairperson that represents business interests. Wis. Stat. §49.143(2)(a).

**W-2 Program Eligibility**

There are five categories of individuals who may be eligible for W-2 services:

1. Individuals age 18 or older who are custodial parents of minor children;
2. Individuals age 18 or older who are Non-Custodial Parents (NCPs) of minor children and the subject of a child support order, if the custodial parent of the minor children is participating in W-2 or the Wisconsin Shares child care subsidy;
3. Individuals under age 18 who are custodial parents of minor children;
4. Pregnant women age 18 or older who are not custodial parents; and
5. Unmarried pregnant women age 18 or older who are in their third trimester of an at-risk pregnancy that results in their inability to work.

Custodial parents may be eligible for all W-2 services. Minor parents and NCPs may be eligible for W-2 case management services and Job Access Loans (JAL). An NCP may also be eligible for a monetary stipend for up to four months or a Trial Employment Match Program (TEMP) job.

Pregnant women who are not custodial parents are eligible for case-management services. Those in their third trimester of an at-risk pregnancy that renders them unable to work may be eligible for cash assistance.

**W-2 Program Financial and Non-financial Eligibility Requirements**

Financial Eligibility Requirements

The W-2 group's income must be at or below one hundred fifteen (115) percent of the federal poverty level (FPL). All earned and unearned income of all the W-2 group members is counted in determining the 115 percent gross income test, with the exception of the following:

- Tax Refunds;
- Educational aid;
- Federally funded benefits; and
- Earned income of a dependent child.

(Wis. Stat. §49.145(3)(b))

At application, the W-2 group's assets cannot exceed two thousand five hundred dollars ($2,500) in combined equity value, excluding the combined equity value of vehicles up to ten thousand dollars ($10,000) and one home that serves as the homestead (Wis. Stat. §49.145(3)(a)).

Once eligible for W-2, if the W-2 group's assets exceed $2,500 for two consecutive months, the group becomes ineligible for W-2. (Wis. Stat. §49.145(4)).

2017 Wisconsin Act 269 provides that the value of a home serving as the W-2 group's homestead may only be excluded if the home is valued at no more than two hundred (200) percent of the statewide median value for homes, excluding the value of agricultural land owned by the W-2 group. DCF may establish a hardship exemption to the new asset restrictions by rule. The additional asset restriction is effective January 1, 2019. DCF is in the process of promulgating rules to define "a hardship exemption." DCF estimates that asset changes will be implemented by the conclusion of 2021.

Non-financial Eligibility Requirements

1. Custodial parent [Except NCPs are eligible for JALs, limited stipends, and TEMP placements]. Wis. Stat. §49.145(2)(a).
2. Age 18 or above. Wis. Stat. §49.145(2)(b).
3. U.S. Citizen or qualifying alien. Wis. Stat. §49.145(2)(c) and §49.84(5).

4. Residence in Wisconsin. Wis. Stat. §49.145(2)(d).
5. Cooperation in establishing paternity. Wis. Stat. §49.145(2)(f)1.a.
6. Cooperation in obtaining support payments. Wis. Stat. §49.145(2)(f)1.b.
7. Furnishes agency with relevant information. Wis. Stat. §49.145(2)(g).
8. Made good-faith effort to obtain employment, has not refused any bona fide offer of employment within the 180 days prior to application, and searches for unsubsidized employment while the application is processed, if required by the W-2 agency. Wis. Stat. §49.145(2)(h)-(hm), and Wis. Stat. §49.147(2)(a).
9. Not receiving Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), Social Security Child's Disability (SSDC), or state supplemental payments. Wis. Stat. §49.145(2)(i).
10. Not participating in a strike. Wis. Stat. §49.145(2)(j).
11. Applies for or has a Social Security Number. Wis. Stat. §49.145(2)(k) and §49.82(2); DCF 101.09 (2), Wisconsin Administrative Code.
12. Reports changes in circumstances within 10 days. Wis. Stat. §49.145(2)(m).
13. Participation in W-2 does not exceed 48 months except when the agency determines that the individual is experiencing hardship or that the individual's family includes an individual who has been battered or subjected to extreme cruelty. Wis. Stat. §49.145(2)(n). The 48 month lifetime eligibility limit will go into effect with the passage of administrative rule changes currently being promulgated by the Department. DCF anticipates a promulgated administrative rule in 2019.
14. No other member of the W-2 group is participating in W-2. Wis. Stat. §49.145(2)(q).
15. Not a fugitive felon. Wis. Stat. §49.145(2)(r).
16. Not violating a condition of probation, extended supervision, or parole. Wis. Stat. §49.145(2)(rm).
17. Assigns to the state any support or maintenance from any other person. Wis. Stat. §49.145(2)(s).
18. Identifies in writing whether s/he has been convicted of a drug felony. Wis. Stat. §49.145(2)(v).
19. Complies with other eligibility criteria established by the Department through administrative rule. Wis. Stat. §49.145(2)(L).
20. Not ineligible due to receipt of child care assistance while residing with the child's other parent and that parent refuses to participate in prescribed work, training, or community-service activities. Wis. Stat. §49.15 and Wis. Stat. §49.151(1m).

(See W-2 Manual Chapter 2.)

## W-2 Program Services and Placements

The primary components of W-2 case management include screening and assessment, development of employment goals and an Employability Plan (EP), and participation in activities associated with the individual's assigned paid or unpaid placement. Case management is a dynamic process, and plans and activities are subject to changes that reflect additional information obtained during ongoing case management.

### Screening and Assessment

Screening and assessment include informal assessment, educational needs assessment, career assessment, and formal assessment. The purpose of the informal assessment is to gather information about an individual and his or her family to determine the individual's ability to become employed and remain employed; services and activities necessary for the individual to become employed and remain employed; appropriate placement of a participant; need for further career assessment and planning; need for vocational evaluation; existence of potential disabilities or other specific limitations through screening with a validated screening tool; and need for a formal assessment of any disabilities or other employment barriers by a qualified assessing agency or individual. Informal assessment is an ongoing case management practice which starts during the W-2 application period and continues until the individual no longer receives W-2 services. (See W-2 Manual Chapter 5.)

### Employability Plan

Every W-2 participant works with a Financial and Employability Planner (FEP) to develop an initial EP. The EP is developed through a collaborative process between the FEP and the applicant or participant taking into consideration the individual's personal strengths and barriers identified through assessment. It details what the individual will do to reach his/her employment goal (or goal to obtain SSI/SSDI) and what the W-2 program will do to assist in that effort. The EP also may include goals to help the participant meet basic and immediate family needs such as food, clothing, shelter, and health care. Meeting these needs helps the family to achieve and/or maintain economic stability. The EP is reviewed and updated at least once every six months, and may be updated more frequently if individual circumstances change. (See W-2 Manual Chapter 6.)

## W-2 Program Paid and Unpaid Placements

The W-2 program has paid placements in which the participant receives a monthly payment, a subsidized employment placement in which the participant receives a subsidized wage, and unpaid placements in which the participant receives case management services only. Every applicant and participant is assigned to a placement to meet his or her individual needs. The W-2 program has multiple placements to meet the needs of eligible parents with varying skills and circumstances.

### W-2 Paid Placements

The W-2 program's paid placements are: Community Service Job (CSJ); W-2 Transition

(W-2 T); Custodial Parent of an Infant (CMC); and At-Risk Pregnancy (ARP).

1. CSJ placements are for individuals who need to develop basic skills and work habits in a work training environment. Two-third, one-half, and one-third time CSJ placements may be used for individuals already working part-time who need to develop additional skills for full-time employment. CSJ participants are expected to complete 40 hours of activities per week but can be assigned fewer hours depending on the participant's circumstances. Of these 40 hours, up to 10 hours per week can be in education and training activities. CSJ work training hours countable toward the maximum 40 hours of activity as approved by the FEP may include:

- Work experience;
- Training activities conducted at the CSJ work training site;
- Other assigned work training activities, such as:
    - Job search activities;
    - Vocational rehabilitation; and
    - Meetings with child support agency staff, social workers, health care professionals or other meetings approved by the FEP and necessary to prepare a participant for employment.

1. W-2 T placements are for individuals who are unable to perform independent, self-sustaining work because of domestic abuse, functional limitations, disability, or family barriers. Based on the results of a formal assessment, the participant may be assigned up to 40 hours per week in activities, which may include work training, other W-2 T activities, and education and training. Examples of W-2 T work-training activities approved by the FEP may include:

- Community rehabilitation program - a program that provides directly, or facilitates the provision of, vocational rehabilitation to individuals with disabilities and that enables an individual with a disability to maximize opportunities for employment. Services may include vocational assessment, job readiness training, job placement, and on-the-job support targeted at individuals with disabilities. Assignable activities vary depending on the focus of the program, but may include:
- Disability and Learning Assessment;
- Career Planning & Counseling;
- Employment Search;
- Mentoring/Coaching;
- Job Readiness/Motivation;
- Occupational Testing;
- On-The-Job Training;
- Paid Work Experience in the public sector, not funded by TANF;

- Work Experience;
- Activities similar to a CSJ, but with more supervision; or
- Volunteer activities.

1. CMC placements are for individuals who are the custodial parent of an infant who is eight weeks old or younger. Participants in this placement are not assigned to activities; however, they are encouraged to volunteer for activities that help them prepare for work and the demands of being a parent.

1. ARP placements are for unmarried women who are in the third trimester of an at-risk pregnancy that results in their being unable to work, and who meet all W-2 eligibility criteria except that they are not a custodial parent of a dependent child. Participants in this placement are not assigned to activities; however, they may volunteer, with medical approval, for activities that help them prepare for work and the demands of being a parent.

W-2 Subsidized Employment Placement

The W-2 program's subsidized employment placement is the Trial Employment Match Program (TEMP) job placement. TEMP job placements are for individuals who have some basic employment skills but still need some assistance and work experience to succeed in unsubsidized employment. An individual working in a TEMP job earns at least minimum wage, and the W-2 agency subsidizes all or a portion of the hourly wages paid to the individual by the employer. There are two TEMP placements: TEMP for custodial parents (CPs) and TEMP for non-custodial parents (NCPs). TEMP is available to CPs and NCPs statewide beginning January 1, 2019. NCP TEMP is an exception to the general requirement that W-2 participants be CPs. An NCP that is cooperating with child support and shares a child in common with a CP who is in W-2 or receiving a Wisconsin Shares child-care subsidy (due to participation in other qualifying activities, typically unsubsidized employment), is eligible for a TEMP job and enhanced case management, including a monetary stipend for up to four (4) months. At the same time, Wisconsin is piloting its Transitional Jobs subsidized employment program outside W-2.

W-2 Unpaid Placements

The W-2 program's unpaid placements are: Case Management Job Ready (CMJ); Case Management Follow-Up (CMF); Case Management for Underemployed (CMU); Case Management for Non-Custodial Parents (CMN); Case Management for Minor Parents (CMM); Case Management for Pregnant Women (CMP); and Case Management Denied (CMD).

1.

2.

3. CMU placements are for employed applicants who do not have any barriers to full-time employment and meet the W-2 nonfinancial and financial eligibility requirements. The goal of CMU is to give participants the assistance they need to stay employed and

advance in their careers. CMU placements are also for participants that participated in the CMF placement for twelve months and wish to receive additional case management services.

4.

5.

6.

7.

Time Limits

The maximum period of participation in a TEMP, CSJ, or W-2 T placement is limited to twenty-four (24) months for each placement. Extensions of the twenty-four (24) month limit may be available on a limited basis when barriers exist that prevent employment. (See W-2 Manual, Chapter 2.) Under provisions of 2015 Wisconsin Act 55, Wisconsin is changing its maximum lifetime limit of sixty (60) months for W-2 participation to forty-eight (48) months as well as the criteria for approving extensions. Under the amended statute, W-2 agencies may grant extensions of the 48-month lifetime limit if they determine, in accordance with rules promulgated by DCF, that an individual is experiencing hardship or that the individual's family includes a member who has been battered or subjected to extreme cruelty. Act 55 also contained non-statutory language that gives DCF discretion to allow individuals participating in W-2 on the effective date of the 48-month lifetime limit to remain in W-2 for an appropriate time beyond 48 months in order to allow for transition out of W-2. DCF is in the process of promulgating rules to define "hardship" and the criteria for the transition period. DCF estimates that the lifetime limit changes will be implemented by the conclusion of 2021. (See W-2 Manual Chapter 2.)

Drug Felons

If a participant in a CSJ or W-2 T placement was convicted in any state or federal court of a drug-related felony within five years of applying for a W-2 paid placement, the individual must submit to a test for use of a controlled substance as a condition of continued eligibility.

If the test results are positive, the W-2 agency must decrease the pre-sanction benefit amount for that participant by up to fifteen (15) percent for no fewer than twelve (12) months, or for the remainder of the participant's period of participation in the employment position, if less than 12 months. The W-2 agency may also require an individual who tests positive for use of a controlled substance to participate in a drug abuse evaluation, assessment, and treatment program as part of the work or education and training requirements for that employment position. The participant will be required to take another drug test at the end of the sanction period to determine whether he or she is eligible for a full W-2 payment. (See W-2 Manual Chapter 11.)

Controlled Substance Abuse Screening, Testing, and Treatment

2017 Wisconsin Act 59 expanded current controlled substance abuse screening, testing, and treatment requirements as a condition of eligibility for certain DCF work experience programs to the following W-2 paid placements: TEMP, CSJ, and W-2 T. Individuals applying for a W-2 paid placement as well as all adult members of the applicant's W-2 group whose income or assets are included in determining the individual's eligibility for W-2 will be subject to the requirements. The screening and testing requirements do not apply to custodial parents of a child who is 8 weeks old or less, women in a medically verified at-risk pregnancy, or group members exempted by DCF administrative rule. DCF is required to promulgate rule to implement the controlled substance abuse screening, testing, and treatment requirements for W-2.

Individuals applying for a W-2 paid placement as well as all adult group members of their W-2 group will be required to complete a controlled-substance abuse screening. If, on the basis of the screening results, the administering agency determines there is a reasonable suspicion that the individual or group member is abusing a controlled substance, the individual or group member must undergo a drug test. Individuals or group members who test positive for a controlled substance without evidence of a valid prescription will be required to participate in a treatment program in order to remain eligible to participate. During the time that an individual or group member is receiving substance abuse treatment, the individual or group member is required to undergo random testing for the use of a controlled substance. In addition, a test for the use of a controlled substance is required at the completion of substance abuse treatment.

If an individual or any of the individual's W-2 group members fails to satisfy the screening, testing, or treatment requirements, then the individual will remain partially eligible for reduced monthly payments under a CSJ or W-2 T placement. A protective payee will receive the payment and use it exclusively for the benefit of the dependent children. The individual will remain partially eligible for 12 months. DCF may promulgate rule providing criteria for the individual to regain eligibility for full participation earlier than the end of the 12 month period.

**W-2 Related Programs**

In addition to the W-2 program, W-2 agencies administer the “related programs” of Contracted Child Care, Emergency Assistance (EA), JALs, and Refugee Cash Assistance (RCA) to help eligible individuals and their families.

1.
2.
3.
4.

Many of Wisconsin's TANF programs use a percentage of the FPL to define eligible needy families. While each program has its own standards, none exceed three hundred (300) percent of the FPL. The applicable program description indicates when an alternate measure of neediness is used.

Wisconsin's Other Programs and Services

1. In addition to W-2 and the W-2 Related Programs described in this section, Wisconsin supports other TANF programs and services described in Attachment 1.
2. In addition to Wisconsin's other TANF programs and services, Wisconsin supports a number of non-TANF programs and services, described in Attachment 2, that assist needy families and children.

B. REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

W-2's goal is to connect parents with appropriate work or work training as soon as possible. A W-2 participant is placed in the highest possible employment or work-training level according to his or her ability. As participants gain work experience and skills, they are expected to move up to the next appropriate level of work or training at the earliest opportunity. Unsubsidized employment is the goal for most W-2 participants, and applicants may be required to search for unsubsidized employment while their applications are pending. The EP includes the specific program activities for the W-2 participant to achieve employment. These program activities focus on the participant's employment, family, and personal needs identified in assessments and screenings. (See W-2 Manual Chapter 6, W-2 Manual Appendix on Activity Codes, and information on the Employability Plan within section **A.i.** above.)

**Ongoing Case Management and Supportive Services**

The W-2 FEP provides ongoing case management for the W-2 participant, including periodic reassessment of the current placement based on circumstances at the time. The FEP works with the W-2 participant to assist in addressing family and work-related needs before situations result in a family crisis, nonparticipation in program activities, and/or loss of employment. The FEP provides information necessary to connect applicants/participants with supportive services available within the agency as well as other resources in the community. Supportive services may include housing, child care, transportation, family health care, economic supports, household budgeting, employment support needs such as work connection and retention services, and other needs identified by the participant that impede the participant's ability to find and retain a job. (See W-2 Manual Chapter 7.)

**W-2 Employment positions (Work Training or Subsidized Employment placements)**

The W-2 FEP may offer the W-2 applicant a work training placement (TEMP, CSJ or W-2 T), if the applicant's good-faith attempts to obtain employment have been unsuccessful, or if the W-2 agency determines that the applicant is not prepared for unsubsidized employment. While participating in a work training placement, the W-2 participant may be required to continue appropriate ongoing employment search with the assistance of the W-2 agency. (See W-2 Manual Chapter 7.)

W-2 emphasizes that education and training are a pathway to meaningful employment, rather than an alternative to employment. Combining work or work training activities with short-term education and training at a minimum prepares participants for entry-level employment. W-2 agencies may coordinate with the Technical College system or other educational programs to provide a variety of Adult Basic Education opportunities including literacy skills and remedial math, as well as completing a high school diploma or equivalency or certified (or diploma/degree) training program consistent with the participant's career assessment results. (See W-2 Manual Chapter 8.)

**Required Hours of Participation**

W-2 participants are required to participate in up to forty (40) hours of assigned activities per week. The number of assigned hours depends on the participant's circumstances. For CSJ participants, within the up to forty (40) hours per week of assigned activities, up to ten (10) hours per week may be in education and training activities. For W-2 T participants, within the up to forty (40) hours per week of assigned activities, up to twelve (12) hours per week may be in education and training activities. (See W-2 Manual Chapter 7).

**Performance Outcomes**

The performance outcomes, stated in the W-2 Contracts for the period starting January 1, 2013, reinforce that the focus of W-2 agencies is engage participants in work, educational attainment, and vocational training activities; assist participants in obtaining employment with opportunities for wage increases; and support participants in maintaining long-term employment.

**Work Verification Plan**

Wisconsin's TANF Work Verification Plan addresses countable work activities, hours engaged in work, procedures for identifying work-eligible individuals, etc. See Wisconsin's TANF Work Verification Plan at: https://dcf.wisconsin.gov/files/w2/tanf-state-plans/tanf-work-verification-plan-10-1-08.pdf

**Learnfare Case Management Services**

Learnfare, a component of the W-2 program, requires school-age children of W-2 participants to enroll in and attend school. Learnfare also requires minor parents, habitual truants, dropouts, and returning dropouts to participate in case management. 2015 Wisconsin Act 55 extended the requirement to participate in case management to children whose parents were assigned to a CSJ, W-2 T, or TEMP placement but were unable to participate in required activities due to the child's school-related problems. 2017 Wisconsin Act 59 revised the Learnfare statute to require children to attend school regularly and not be a habitual truant. A habitual truant is defined as a student absent from school without an acceptable excuse for part or all of five or more days on which school is held during a semester. Learnfare case management focuses on services to maintain school enrollment, improve school attendance, and prepare children for a career. A family's monthly W-2 payment could be sanctioned if a child is not enrolled in school or is a habitual truant, refuses to cooperate with Learnfare case management, has no good cause granted, and has not requested a Fact Finding Review. (See W-2 Manual Chapter 16.)

**Employment Transportation Services**

Wisconsin has made it a priority to work with job seekers, employers, and local service providers to address transportation needs for low income families. (See W-2 Manual Chapter 19.)

**W-2 Two-Parent Household Participation**

W-2 philosophy strongly emphasizes the responsibility both parents have to care for and support their children. (See W-2 Manual Chapter 14.)

C. ENSURE THAT PARENTS AND CARETAKERS RECEIVING ASSISTANCE ENGAGE IN WORK IN ACCORDANCE WITH SECTION 407 (SECTION 402(A)(1)(A)(III) OF THE SOCIAL SECURITY ACT). CONSISTENT WITH THE REQUIRED STRATEGIC ELEMENTS DISCUSSED IN SECTION II (A)(2) HEREIN, PROVIDE A SPECIFIC ANALYSIS OF HOW THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES ARE ADDRESSING EMPLOYMENT AND TRAINING SERVICES FOR PARENTS OR CARETAKERS RECEIVING ASSISTANCE

**Intensive Case Management**

To ensure that parents eligible for W-2 are engaged in work activities, the W-2 program provides intensive case management and supportive services, such as child care, transportation, housing, and other services that address the parent's family and work-related needs.

**Participation in Work Activities**

The W-2 program encourages parents to engage in work activities by providing strengths-based and family-centered services that are consistent with the parents' interests and goals. Parents may be assigned to participate in work activities as a condition of receiving assistance payments. W-2 agencies include parents in the decision-making process to identify appropriate work activities. (See W-2 Manual Chapter 1.) W-2 agencies also encourage parents to engage in work activities by tracking the eligible parents' time limits and discussing the impact of time limits with applicants and eligible parents. (See W-2 Manual Chapter 2.)

W-2 agencies meet with each eligible parent to review assigned activities and the parent's progress toward meeting the established goals. W-2 agencies also complete an EP review with each eligible parent as often as necessary based on the eligible parent's circumstances. The W-2 agencies consider the parent's progress in assigned activities in the agencies' future decisions regarding placement and activity assignment. (See W-2 Manual Chapter 6.)

W-2 agencies verify and track a parent's attendance in assigned activities based on Wisconsin's TANF Work Verification Plan. (See W-2 Manual Appendix on TANF Work Participation Requirements.) See Wisconsin's TANF Work Verification Plan at: https://dcf.wisconsin.gov/files/w2/tanf-state-plans/tanf-work-verification-plan-10-1-08.pdf

The W-2 program utilizes workforce development activities to address employment and training services for parents in the following ways:

*Career Services*: In order to connect parents to relevant and tailored career pathways that will help them receive the training and credentials needed to obtain jobs with family-sustaining wages, all W-2 applicants and participants complete a career assessment during the informal assessment process as well as throughout ongoing case management. There is a wide array of career assessments tools that W-2 agencies and job seekers use to obtain greater awareness about how a participant's work styles, skills, and interests can be used to define a career path, assign meaningful activities, highlight strengths, identify training needs, and match the participant to fulfilling work activities and employment opportunities. While W-2 agencies are

able to choose the career assessment tools that they feel best measure work styles, skills, and interests, some agencies choose to use the Department of Workforce Development's Career Exploration online tool.

If an applicant is new to W-2 or is re-applying and does not have career assessment results documented, an assessment must be scheduled within 30 days of application and completed within 30 days of placement. If an applicant has completed a career assessment that identifies work styles, skills, and interests, and wants to remain on the career path indicated by that assessment, or is already working in a field available in the local labor market, another career assessment does not need to be completed.

Based on the results of the career assessment and career planning with a Financial and Employment Planner, W-2 participants' Employability Plans (EP) shall include both long- term and short-term career goals with action steps, objectives, and the appropriate combination of services and training needed to achieve each goal.

*Training Services:* W-2 participants are assigned to education and training activities that will prepare them for careers available in local job markets.

Education and vocational assessment tools are used in combination with career assessment tools to identify the education and training needed to help individuals obtain employment that fits their work styles, skills, and interests. Results from these assessments are used in tandem to better inform the development of effective EPs and assignment of meaningful work and education and training activities, including adult basic education, technical college education, and job skills training, including customized job skills training.

Educational needs assessment tools, like the Test of Adult Basic Education (TABE) or Wide Range Achievement Test (WRAT), test skills and aptitudes in reading, language, math computation, and applied math in order to identify current math and reading comprehension levels and any literacy or numeracy deficiencies. W-2 agencies use the educational needs assessment results to provide participants with appropriate education activities including, but not limited to, a course of study meeting the standards established under Wis. Stat. 115.29(4) for the granting of a declaration of equivalency of high school graduation; English-as-a-Second Language, and adult basic education courses. Agencies also use the educational needs assessment results to match eligible adults to appropriate technical college courses and other educational courses that provide an occupational skill. The agencies are required to work with technical colleges to offer certified (or diploma/degree) training programs. Regardless, the training courses must be tied directly to occupations for which there are job openings in the local labor market. Contractors also use the educational needs assessment results to match eligible adults to appropriate job skills training, including customized skills training.

Vocational assessment tools help individuals living with a disability establish realistic vocational goals and a plan to achieve them. The vocational evaluation process is designed to assess the unique strengths, resources, and experiences of an individual in order to match that person's abilities and preferences to appropriate work placements, jobs, or training programs. The process is interactive; the intent is for staff to learn about the participant and the participant to learn about themselves.

In W-2, agencies use education and vocational assessments to match participants to job skills (or vocational) training programs. These programs must lead to one of the six listed credits, credentials, certificates, or degrees listed below.

1. Credits or a credential earned from a Wisconsin-based eligible training provider, as defined by the Workforce Innovation and Opportunity Act (WIOA) Statewide List of Eligible Training Programs and Providers (including Continuing Education Credits);
2. A license, recognized by the State or Federal Government;
3. A certificate of apprenticeship completion;
4. A certificate of completion of a program approved by the Office of Skills Development through a Fast Forward or Blueprint for Prosperity grant; (For more information about Fast Forward and Blueprint for Prosperity grants, please visit www.wisconsinfastforward.com/.)
5. Completion of a customized training established with an employer(s) with the written understanding that the employer(s) will make a good faith effort to hire the participant upon successful completion of the training; or
6. A bachelor's or associate degree.

Agencies are required to have available a wide range of jobs skills training programs, including customized job skills training programs. The customized job skills training programs include employer participation in the design and implementation of the training. Customized job skills training programs are designed using industry-approved training requirements and in alignment with known career pathways in the local labor market. When necessary, agencies match eligible parents to bridge programs so that they can attain the basic skills they need to enter job skills training programs. Regardless, agencies must ensure that parents who complete training have acquired marketable job-specific skills.

Business Services: W-2 agencies actively help applicants and eligible parents find employment in the local labor market. In order to effectively do this, agencies have business service units within their agencies, and employ job developers, often referred to as Account Executives, Business Services Managers, Employer Account Representatives, etc.

Most W-2 agencies are co-located at the local Job Center. Job Centers have Business Services Teams (BST) that coordinate activities and resources with Job Center partners to provide comprehensive high quality, customer centered services to employers. Business Services Teams include Workforce Innovation and Opportunity Act core program representatives as well as other combined state plan partners. Where the W-2 agency is co-located in the Job Center the business service unit is part of the Job Center's BST.

In W-2, job development is the process of creating job opportunities for W-2 participants by researching, identifying and soliciting commitments from possible sources of employment. Job developers have a thorough knowledge of local labor market information, including high-growth industries and career paths that exist within those industries. They coordinate with members of the BST to identify employers within local area industry that are best prepared to work with the W-2 population. They understand local industry trends and occupations and have capacity to engage with employers to assist in meeting their recruitment needs. Finally, they identify the skill-sets local industries need and apply related skill development to work experience and job skills training programs.

W-2 agencies provide the following work activities to W-2 participants:

- Individualized job readiness services including
    - Career and vocational assessments;

    - Career exploration and planning;
    - Jobs readiness assessments;
    - Job readiness instruction, including soft skill development;
    - Interviewing skills and mock interviews;
    - Job coaching;
    - Resume review and updating; and
    - Job search instruction and assistance, including applying for jobs online.
- Additional work activities include:
    - Work experience;
    - On-the-job training;
    - Job coaching;
    - Employment retention services, and
    - Advancement services.

W-2 agency staff also provide the following services:

- Research the local labor market and contact employers to create job opportunities that are appropriate for local W-2 applicants or eligible parents;
- Match individual applicants or eligible parents to jobs in the area;
- Arrange job interviews and provide post interview follow up with both the parent and the local employers;
- Provide access to clothing for interviews;
- Identify and develop work experience sites to better prepare those participants who have some work skills but are not yet prepared to succeed in unsubsidized employment;
- Organize job fairs; and
- Work with W-2 agencies' Community Steering Committees as well as general business and sector-specific associations and local workforce development boards to avoid duplication of workforce services, improve employer access to skilled workers, exchange best practices, and collaborate on funding opportunities.

In addition to the work activities and services listed above, W-2 participants also benefit from the services provided to employers thought the BSTs.

**Penalties/Payment Reductions**

CSJ and W-2 T participants must participate in all assigned work training activities or education and training activities outlined in the EP. Payments for CSJ and W-2 T participants who fail to participate in assigned activities are reduced for hours missed without good cause. To encourage parents to engage in work activities, the W-2 program requires parents to notify the W-2 agency of the reason for the parent missing any assigned W-2 activity. The W-2 agency determines if a parent's reason for missing an assigned activity meets a W-2 good cause reason

based on good cause policy. If the parent misses an assigned activity without good cause, the W-2 agency applies an hourly payment reduction for each instance. (See W-2 Manual Chapter 11.)

Refusal to Participate

A W-2 participant assigned to a W-2 employment position (CSJ, W-2 T, or TEMP position) may become ineligible for any facet of W-2 for three (3) months if, without good cause as determined by the Department, the W-2 participant fails to appear for an interview with a prospective employer (including a sponsor of work experience or subsidized employment) or for an assigned work activity, voluntarily leaves employment or training activities or a work-experience site without good cause, is discharged from employment or training or a work-experience site for cause, or demonstrates through other behaviors or actions defined by the Department through administrative rule that he or she refuses to participate. Additionally, a W-2 participant may become ineligible if residing with the other parent of a child and receiving child care assistance, if the other parent is neither disabled nor caring for a severely disabled child and the other parent refuses to work in subsidized or unsubsidized employment or other work-experience, job-training, or community-service activities prescribed by the Department.

Intentional Program Violations

The penalties for intentional program violations (IPVs) help ensure parents provide accurate information about their work activities to W-2 agencies.

Wis. Stat. §49.001(3m) defines an intentional program violation as:

"… intentionally making a false or misleading statement, intentionally misrepresenting or withholding facts, or intentionally committing any act that constitutes a violation of state or federal law for the purpose of using, presenting, transferring, acquiring, receiving, possessing, or trafficking benefits under this chapter."

An individual who applies for or receives assistance payments under W-2, Wisconsin Shares Child Care, EA, and/or JALs and commits an intentional program violation for the purpose of establishing eligibility, maintaining eligibility, or increasing assistance payments, will be denied assistance as follows:

- For six months for the first intentional program violation;
- For one year for the second intentional program violation; and
- Permanently for the third intentional program violation.

## D. TAKE SUCH REASONABLE STEPS AS THE STATE DEEMS NECESSARY TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION ABOUT INDIVIDUALS AND FAMILIES RECEIVING ASSISTANCE UNDER THE PROGRAM ATTRIBUTABLE TO FUNDS PROVIDED BY THE FEDERAL GOVERNMENT (SECTION 402(A)(1)(A)(IV) OF THE SOCIAL SECURITY ACT)

Existing Wisconsin statutes and W-2 policy restrict the use and disclosure of information about individuals and families receiving assistance under the program. W-2 policy restrictions on the use and disclosure of information about individuals and families focus on when disclosure is necessary for administration of the W-2 program or law enforcement purposes. (See W-2 Manual Chapter 4.)

In addition, DCF restricts access to data stored in CARES, Wisconsin's eligibility determination and case management system, by requiring state authorized access to the system depending

upon each user's job responsibilities. For more information, contact DCF Security regarding DCF's Information Technology Security Management Policy.

## E. ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)

The W-2 program and the programs referenced in this section include TANF-funded programs and services that have established goals and take actions to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on adolescent pregnancy prevention, adolescent parent self-sufficiency, adolescent pregnancy counseling, and adolescent parenting skills. In addition, Wisconsin provides funding for other services, which coordinate with the TANF services, to reduce unintended pregnancies.

**W-2 Program's Prevention and Reduction of Out-of-wedlock and Unintended Pregnancies**

Although minor parents living outside of an adult-supervised living arrangement are not eligible to receive a W-2 payment, W-2 agencies are required to provide case management services to minor parents (both male and female parents), regardless of their income, assets, or living arrangement. These case management services are required to include discussions of family planning, career planning, and parenting skills.

In addition, the following elements of the design of the W-2 program implements Wisconsin's goals to prevent and reduce out-of-wedlock pregnancies in the population served by W-2:

1. Flat grants: W-2 provides payments based on participation, not family size.
2. Family cap: W-2 does not treat parents who have additional children while on assistance differently for W-2 time limits. Parents caring for a child who is younger than eight weeks old may be eligible to receive a monthly payment for their living expenses that does not include a work requirement. However, parents receiving such payments are exempt from the state lifetime limit only if the child is born less than ten months after the individual was first determined eligible for W-2 or if the child was the result of sexual assault or incest.
3. Case management: W-2 FEPs may counsel participants to delay subsequent births or provide referrals to family planning services. FEPs assist participants in making choices about their career and family, make appropriate referrals based on the family's needs, and encourage the use of resources available to families. Each W-2 agency maintains a list of family-planning referral agencies and health care providers which is available to all customers.

DCF provides grants to the Boys and Girls Clubs of America operating in Wisconsin to provide services that improve the social, academic, and employment skills of low-income at-risk youth. Families that meet income-eligibility requirements for the free and reduced-price school lunch program may participate in a full range of services.

The Boys and Girls Clubs' Skills Mastery and Resistance Training (SMART) curricula focus on helping youth develop healthy attitudes and responsible behaviors that lead to: abstinence from sexual involvement and substance abuse, positive relationships free of violence and abuse; and overall health. SMART presents topics and uses different approaches based on the gender and

age of the participants. These grants use solely federal TANF funds to permit targeting services to sites serving high concentrations of children from needy families without excluding other neighborhood children from participation.

**Brighter Futures**

Under the administration of DCF, the Brighter Futures program awarded grants to private nonprofit and public agencies in Milwaukee County, and county social services agencies in other counties. These grants, which fund programs for the prevention of out-of-wedlock pregnancy, youth violence, substance use and abuse, and child abuse and neglect, also include a mission to promote self-sufficiency for pregnant adolescents and adolescents who are parents. Brighter Futures supports positive youth development and prevention programs in high-risk communities and high-poverty neighborhoods. Programs serve infants, children, youth, and families, and focus on increasing adolescent functioning by encouraging high school graduation, vocational preparedness, improved social and other interpersonal skills, and responsible decision-making.

**Healthiest Wisconsin 2020 Plan**

DHS, in coordination with DPI and DCF, developed the following strategies for Wisconsin to address adolescent pregnancy prevention: encourage and promote delayed sexual activity, and provide access to confidential contraceptive and related reproductive health services.

These strategies are consistent with the Healthiest Wisconsin 2020 Plan, the current State Public Health Plan.

The Healthiest Wisconsin 2020 Plan highlights the importance of: reproductive and sexual health, comprehensive sex education, and better access to clinical services to reduce the rates of adolescent and unintended pregnancies. Wisconsin established three statewide goals to reduce rates of unplanned pregnancies, especially adolescent pregnancies:

1. Establish a norm of sexual health and reproductive justice by measuring the percentage of sexually active high school students who reported that they or their partners had used a condom during their last sexual intercourse (Youth Risk Behavior Survey [YRBS]);
2. Establish social, economic, and health policies that improve equity in sexual health and reproductive justice; and
3. Reduce the disparities in reproductive and sexual health experienced among populations of different races, ethnicities, sexual identities and orientations, gender identities, and educational or economic status as measured by HIV/STD Surveillance and YRBS data.

See Healthiest Wisconsin 2020 at: https://www.dhs.wisconsin.gov/hw2020/index.htm.

**Medicaid Family Planning Services**

DHS administers Family Planning Only Services, which is a Medicaid-funded program for persons aged fifteen (15) years and older who:

1. Have income that does not exceed three hundred (300) percent of the FPL; and
2. Are not eligible for full benefits from Medicaid or BadgerCare, Wisconsin's health services for low-income families.

The Medicaid Family Planning Services provide selected family-planning services, including free contraceptive services and supplies, initial family planning office visits, tests for abnormal cervical cells (Pap tests), and tests and treatment for sexually transmitted diseases.

### F. CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

DCF, DPI, and DHS in partnership with the Wisconsin Coalition Against Sexual Assault (WCASA) and the Department of Justice (DOJ), work cooperatively to prevent statutory rape, other sexual assault, and adolescent pregnancies. These education and training services, in addition to other services, are designed to reach various professions, including state and local law enforcement officials, the education system, and relevant counseling services ranging from prevention to enforcement based on the needs identified by Wisconsin's communities.

Over the years Wisconsin's adolescent sexual assault prevention and adolescent pregnancy prevention services have evolved to a strengths-based focus on promoting well-being, healthy relationships, sexual health, and self-esteem. The scope for these services includes both males and females.

An example of services implemented across Wisconsin Departments includes DPI's collaboration with DHS and DOJ to create and post an electronic publication describing the circumstances under which educators are required to report sexual activity among adolescents as possible child abuse. A second example is DCF's collaboration with DOJ and DHS to update W-2 program policy to comply with state statutes that require use of the legal substitute address assigned to individuals enrolled in the state's address confidentiality program. This program, known as Safe at Home, aims to protect individuals who fear for their safety such as victims of sexual assault.

Comprehensive services across professions include implementation of the Wisconsin Statutes requirement that Child Protective Services (CPS) agencies refer all cases of suspected or threatened child sexual abuse to law enforcement. Local law enforcement agencies and CPS coordinate the planning and execution of the investigation of the report. Any law enforcement agency that determines criminal action is necessary refers the case to the District Attorney for criminal prosecution. The CPS Access and Initial Assessment Standards describe the statutory requirements and practice guidelines for CPS agencies to enhance collaboration with law enforcement agencies in response to reports of sexual abuse, as well as reports of other forms of child maltreatment. (See the DCF CPS Access and Initial Assessment Standards at: https://dcf.wisconsin.gov/files/cwportal/policy/pdf/access-ia-standards.pdf)

### G. IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

Wisconsin issues payments via paper check or via Electronic Funds Transfer (direct deposit into participants' bank accounts). In order to prevent access of TANF-funded assistance under any

electronic funds transfer in prohibited locations, Wisconsin has: 1) published an operations memo informing its W-2 Agencies of prohibited locations and transactions; 2) included a flyer, available in English, Spanish, or Hmong, as part of the application and eligibility-review processes to ensure that the FEP discusses the information with participants; and 3) mailed a notice October 2014 to all then-current W-2 participants (who would not have received the brochure at intake) informing them of the prohibited locations for using their cash assistance. (See W-2 Manual Chapter 1.)

H. ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

As stated in **A.vii.** above, Wisconsin issues payments via paper check or via Electronic Funds Transfer (direct deposit into participants' bank accounts). W-2 Policy requires the FEP to discuss the possible fees that may be associated with Electronic Funds Transfer with the participant before the participant signs the Electronic Funds Transfer form, which is required to provide bank routing information. By signing the Electronic Funds Transfer form, participants also acknowledge that their W-2 worker talked to them about the possible monthly fees, customer service fees, inactivity fees, and paper statement fees. If a participant is chronically overdrawn or owes fees associated with their negative account balance, the participant may choose to receive their payment via paper check. (See W-2 Manual Chapter 10.)

I. INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

Wisconsin does not treat families moving into the state from another state differently from other families under the program; however, it does verify the amount of time in the TANF program in the other state to assure compliance with the federal 60-month lifetime time limit on receipt of TANF. (See W-2 Manual Chapter 2.)

J. INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

Wisconsin does not provide assistance under the program to individuals who are not citizens of the United States or are not qualified non-citizens. Eligible individuals who are qualified non-citizens receive the same assistance through W-2 and EA as citizens of the United States. W-2 policy is consistent with federal and state definitions and other laws regarding qualified non-citizens. (See W-2 Manual Chapter 2 and EA Manual Chapter 4.)

K. SET FORTH OBJECTIVE CRITERIA FOR THE DELIVERY OF BENEFITS AND THE DETERMINATION OF ELIGIBILITY AND FOR FAIR AND EQUITABLE TREATMENT, INCLUDING AN EXPLANATION OF HOW IT WILL PROVIDE OPPORTUNITIES FOR RECIPIENTS WHO HAVE BEEN ADVERSELY AFFECTED TO BE HEARD IN A STATE ADMINISTRATIVE OR APPEAL PROCESS (SECTION 402(A)(1)(B)(III) OF THE SOCIAL SECURITY ACT)

Wisconsin has established objective criteria for the delivery of benefits, determination of eligibility and for fair and equitable treatment. Wisconsin's objective criteria for the delivery of cash assistance include:

- Maximum payment amounts for W-2 program placements;
- Payment issuance;
- Electronic Funds Transfer;
- Overpayment recovery; and
- Payment reductions.

(See W-2 Manual Chapters 10 and 11 and information on Penalties/Payment Reductions within section **A.iii.** above.)

Wisconsin's objective criteria for the establishment of eligibility include nonfinancial and financial eligibility. (See W-2 Manual Chapters 2 and 3 and information on W-2 Eligibility within section **A.i.** above.)

Due to the variety and needs of each of the TANF programs in this Plan, there are different complaint resolution processes for program eligibility and participation. For TANF programs within DCF, there generally is an informal step first to resolve the issue quickly and with cooperation. When this process does not resolve the issue, there is a formal resolution process. (See W-2 Dispute Resolution Process below.) For TANF programs provided by other Wisconsin Departments, each Department has its own complaint resolution process.

**Labor Standards**

Fair and equitable treatment of W-2 participants is addressed by the labor standards for all W-2 employment and work training sites (for TEMP, CSJs, and W-2 Ts) and require compliance with all federal, state, and local laws, ordinances, and regulations affecting W-2 participants, including requirements for safe and healthy work environments. (See W-2 Manual Chapter 9.)

**W-2 Dispute Resolution Process**

There are two levels of review under the W-2 Dispute Resolution process: 1) a Fact Finding Review; and 2) a Departmental Review.

The purpose of the Fact Finding Review is to resolve disputes for applicants and participants who disagree with a W-2 agency's decision. This includes decisions regarding all W-2 services, including Learnfare, JALs, and EA. An individual or a W-2 agency may request a Departmental Review if either disagrees with a Fact Finding decision.

(See W-2 Manual Chapters 12 and 15.)

**Civil Rights, Affirmative Action, and Complaint Resolution**

Each W-2 agency must meet Civil Rights Compliance and Affirmative Action requirements, which include processes for resolution of complaints. Complaints must be filed within one hundred and eighty (180) days for discrimination complaints. Civil rights investigations are to be completed within ninety (90) days of when the complaint is filed. However, investigations may take longer depending upon the need for additional information from the complainant or other parties involved in the complaint.

The Wisconsin Departments and/or their provider agencies administer all of the state programs included in this Plan. These Departments are DCF, DOA, DHS, DPI, and DOR. All of these Departments and their provider agencies are required to meet state and federal Civil Rights Compliance and Affirmative Action requirements. (See W-2 Manual Appendix on W-2 Agency Civil Rights Obligation.)

L. INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

The W-2 program provides assistance to eligible individuals to train for, seek, and maintain employment that includes providing direct care in a long-term care facility (as terms are defined for the TANF program under section 1397j of Title IV-A of the Social Security Act). The W-2 program's job skills training, work experience, and job retention services provided for TEMP, CSJ, and W-2 T participants often include training and employment services for Certified Nursing Assistants (CNAs), home health aides, and other personal and health care aide positions. The W-2 program's case management services provide ongoing employment retention services for positions that include CNAs, home health aides, and other personal and health care aides.

Additionally, Wisconsin has a program that requires state agencies with 100 or more full-time equivalent positions to annually prepare and implement a plan to hire W-2 participants. State agencies with fewer employees are encouraged to participate in the program as well. A primary goal of the W-2 employment program is to ensure that W-2 customers are enabled to become economically self-sufficient. Together with DCF, the DOA Division of Performance Management provides resources and support to agencies to recruit, assess, certify and retain W-2 participants. W-2 participants are commonly hired for positions related to providing direct care in a long-term care facility, including positions under the following classification titles: nursing assistant, nurse clinician, resident-care technician, and psychiatric-care technician.

DCF will coordinate with DHS's Bureau of Aging and Disability Resources and the Department of Workforce Development (DWD) to plan for and help address Wisconsin's current and ongoing shortage of health care workers for the increasing elder population. The goal of this coordination is to proactively identify geographic movement within Wisconsin of the elder population and the workers who provide health care services, eldercare labor shortage issues, and other eldercare issues. DCF will share this information with W-2 agencies. W-2 agencies are required to keep informed of local economic trends and provide employment services, including job skills training and job development, based on those trends.

M. PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

In addition to the W-2 and the Related Programs described in sections **A.i.** and **A.v.** of this Plan, these programs are anticipated to be funded with TANF and/or MOE funding during the plan period.

Wisconsin uses TANF funds to provide child-care subsidies to certain individuals who are not current participants in its W-2 program. These individuals have a need for child care to participate in specific qualifying activities, including other work programs (the DCF-administered Transform Milwaukee Jobs and Transitional Jobs programs, and the DHS-administered FoodShare Employment and Training Program) and basic education, technical college, or employment-skills education programs determined by the child-care eligibility agency to promote employment retention (eligibility under these provisions is limited to individuals working at least 5 hours a week and limited to a maximum of 2 years). The individual must earn less than one hundred eighty-five (185) percent of the FPL at initial eligibility and less than two hundred (200) percent FPL for continuation, and co-payments based on family size and income apply.

2017 Wisconsin Act 59 amended state law to provide that, once eligible, an individual whose income subsequently exceeds 200% FPL remains eligible until the individual's family income exceeds eighty-five (85) percent of the state median income (SMI). Wisconsin will define exceeding 85% of the SMI as the countable gross income for the assistance group exceeding that level for two consecutive months. Depending on family size, 85% of Wisconsin's SMI is estimated to equate to between 205% and 299% of the FPL. The family's copayment will increase by $1.00 for every $3.00 by which the family's gross income exceeds 200% FPL. As a result, the subsidy will scale down with an increase in income rather than sharply dropping at the exit threshold. This policy change is designed to reduce the experience of a "benefit cliff" following an increase in income. Wisconsin plans to implement the phase-out period for continuing eligibility beginning in late October 2018. Wis. Stat. §49.155(1m)(c)1d.

2017 Wisconsin Act 59 also created an asset limit of $25,000 for eligibility in the Wisconsin Shares child care subsidy program effective November 1, 2017, for new eligibility determinations and reviews on. 2017 Wisconsin Act 269 also created two new asset restrictions for Wisconsin Shares eligibility. Under the Act, an applicant's family also cannot own more than one home, which is valued at more than two hundred percent (200%) of the statewide median value for homes, excluding the value of agricultural land owned by the family. An applicant's family also cannot own any number of vehicles with a combined equity value of more than $20,000, except vehicles used for business purposes. DCF may establish a hardship exemption to the new asset restrictions by rule. The additional asset restrictions are effective January 1, 2019.

Since 2001 (pursuant to an ACF suggestion to align services with TANF purposes 3 and 4), Wisconsin has used federal TANF funds to supplement services to prevent child abuse and neglect in Milwaukee county. Specifically, DCF provides TANF funds for the La Causa Nursery and Parental Respite Center through the Brighter Futures program (which generally focuses on adolescent pregnancy prevention) and contracts with the Milwaukee Health Department to support Empowering Families of Milwaukee, a home-visiting program for pregnant women and their families, and families with infants and toddlers. Goals include improving birth outcomes and preventing child abuse and neglect.

Services are targeted to the eleven (11) zip code areas within Milwaukee that have the lowest income levels, high rates of child abuse and neglect referrals, and poor birth outcomes. There are no financial eligibility requirements for a family to receive these services under TANF. Therefore, Wisconsin uses one hundred (100) percent TANF funds for this program (per federal requirements relating to services for TANF purpose four).

2017 Wisconsin Act 59 modified the traditional Milwaukee Prevention Services TANF program to allow it to be used to supplement and expand the number of "Family Foundations Home Visiting" (FFHV) programs statewide—an umbrella term Wisconsin has used since 2011 for the Empowering Families Milwaukee program and programs in other counties and tribes funded from the federal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) grant and associated state funds. Wisconsin believes children and families will benefit from expanding these services to more areas and families than what can be supported through current MIECHV funding levels. FFHV uses four evidence-based models to provide expectant and new parents with voluntary supports and mentoring through their children's early years. As of 2018, it serves 31 counties and 5 tribes. TANF funds will be targeted to provide services to predominately needy families, who may be facing community violence or experiencing mental health or other challenges as well as poverty. https://dcf.wisconsin.gov/cwportal/homevisiting

Grants for Innovative Prevention Services

2017 Wisconsin Act 254 authorized a new program under which DCF may award grants to counties, nonprofit organizations, or tribes to fund child-abuse and neglect prevention services. Grant applicants must provide matching funds toward proposed projects and services equal to 9.89 percent of the TANF grant amount from DCF. DCF is required to evaluate the effectiveness of the grant program in achieving its stated goals and must first submit a biannual report on the evaluation to the appropriate standing committees of the legislature beginning in June 2021. Wis. Stat §49.175(1)(uk).

Grants for Substance Abuse Prevention to At-Risk Youth

2017 Wisconsin Act 261 authorized a new TANF-funded program under the Brighter Futures statute beginning on or after July 1, 2018. Under this program, DCF must administer grants to provide evidence-based programs and practices for substance abuse prevention to at-risk youth and their families. Eligible grant recipients include nonprofit corporations or public agencies in Milwaukee County, certain county departments, other than in Milwaukee County, and federally recognized American Indian tribes or bands. DCF may not award a grant to a county or tribe that offered evidence-based programs and practices for substance abuse prevention in the preceding fiscal year, unless those services were previously funded by a grant under this program. Wis. Stats. §48.545(2)(c), and §49.175(1)(o).

Families and Schools Together (FAST)

FAST is an evidence-based prevention/early intervention program that connects schools, families and communities to enhance family functioning; promote scholastic success; and prevent substance abuse, delinquency and child maltreatment. The FAST Program consists of eight (8) weekly sessions during which parents and children participate in structured experiences and activities that build cohesiveness and provide opportunities for parents to strengthen their role in the family. Upon completion of the FAST program, parents are transitioned into FAST Works, a parent-led sustainability program that assists and encourages families to maintain connections with each other over the next several years.

2017 Wisconsin Act 59 authorized use of TANF funds to pilot the FAST program in 5 Milwaukee elementary schools chosen by the department. Wis. Stat. §49.175(1)(d). In the current (2017-18) school year, 81.7% of the students in the Milwaukee School District have been identified as economically disadvantaged, meaning that they are a member of a household qualifying for free or reduced priced meals. DCF collaborated with the Milwaukee Public Schools (MPS) to select five schools identified by MPS as low-performing. Three of the five schools selected for FAST in the 2017-18 school year (and for follow-up in 2018-19) are located in the 53206 zip code, which has been identified as especially challenged. The target population for the FAST pilot is families with pupils in 4 year old kindergarten through third grade.

Homeless Case Management Services Grants

2017 Wisconsin Act 59 created the Homeless Case Management Services Grant Program that will be administered by the DOA, Division of Energy, Housing and Community Resources. Under the program, grantees will provide intensive case management services to homeless families. For eligibility under this program, "homeless families" means:

1. Homeless adults (age 18 or older) accompanied by minor children (under age 18 for whom the homeless adults are legally responsible, or under 19 but a full-time student in high school, working on an equivalency degree, or enrolled in basic vocational or technical education);
2. Homeless pregnant women.
3. Non-custodial parents of children under the age of 18; or
4. Individuals who are over age 18 but younger than age 25 and accompanied by another person related by blood or marriage.

Services provided may include financial management, employment supports, ensuring school continuation for children, and enrolling unemployed or underemployed parents in W-2 or the FoodShare Employment and Training Program. The Homeless Case Management Services Grant Program is funded by federal TANF. Funds must be used for services and must benefit needy families.

State Supplement to Earned Income Tax Credit

DOR administers a state Earned Income Tax Credit (EITC), which supplements the wages and self-employment income of lower-income working families. TANF funds are used only for the portion of this refundable credit actually paid out to eligible families. State funds not claimed as MOE are used to pay amounts credited to claimants but intercepted to offset debts. Persons are eligible for the tax credit if they had at least one qualifying child residing with them, were a full-year resident of Wisconsin, and qualified for the federal Earned Income Tax Credit. MOE is only claimed if state funds exceeding the 1995 level are used for the TANF-eligible refunds.

DPI administers funding that assists needy families and their children through educational and non-educational programs provided through the public school system. Wisconsin anticipates claiming for MOE in the Plan period only aid programs that are highly targeted to provide enhanced services to needy families and the portion of the expenditure that is reasonably allocable to eligible families, based on those qualifying for free-and-reduced lunch programs. Specifically:

- State-funded School Nutrition Programs (state supplemental funding for school lunch and breakfast programs, and a state funded "School Day Milk" program); and
- The Achievement Gap Reduction (AGR) Program. This program is being phased in as a replacement to the former Student Achievement Guarantee in Education (SAGE) program, and only schools that previously participated in SAGE are permitted to participate. Under SAGE, DPI made grants to schools with a high percentage of low-income pupils that agreed to reduce classroom sizes and enact certain other policies. The other policies included a curriculum designed to improve academic achievement and a requirement to keep the school open every day for extended hours to make educational and recreational opportunities as well as community and social services available in the school for all district residents.

The last SAGE contracts will expire at the end of the 2017-18 school year. However, under AGR, schools will continue to provide highly targeted programming (intended to reduce achievement gaps) not generally available in Wisconsin public schools and will be reimbursed by DPI as a payment for each low-income pupil attending an AGR classroom. AGR schools must implement one or more of the following in K-3 classrooms:

1. Maintain the 18:1 or 30:2 pupil-teacher ratios in place under SAGE; and/or
2. Provide one-to-one tutoring by a licensed teacher; and/or
3. Provide one or more licensed teachers to offer instructional coaching.

Energy Services

DOA administers the federal Low-Income Home Energy Assistance (LIHEAP), TANF, and state funds that assist needy families (those under 60% of the State Median Income adjusted for family size) with utility and energy bills, reconnection services, crisis intervention services (e.g. furnace replacements), and weatherization services. TANF and TANF MOE funds are used only for families with children.

DCF administers child welfare services in Milwaukee County through the Division of Milwaukee Child Protective Services (DMCPS). DMCPS contracts with local service agencies to provide in-home safety services to children and families. DMCPS's goal is to keep families intact whenever possible by employing strategies and services that control for child safety, stabilize the family, and help the family develop links to community supports. Families receive individualized services tailored to their specific situation and needs as determined by an assessment social worker and an intensive in-home safety services manager. There are no financial eligibility requirements for a family to receive these services. Therefore, Wisconsin uses one hundred (100) percent TANF funds for this program (per federal requirements relating to services for TANF purposes three and four). In 2011 Wisconsin entered into a Child Welfare Program Improvement Plan in which it committed to expanding in-home safety services outside Milwaukee County to reduce the need for out-of-home placements. In 2018, these BOS services were provided by forty-two (42) counties and one (1) tribe and are expected to expand statewide during 2018-2020.

Kinship Care

DCF provides allocations to counties and tribes to manage the Kinship Care program. The program provides monthly payments to relatives who care for minor relative children whom

CPS has determined are unsafe residing with their biological parents. (See W-2 Manual Chapter 19.)

SSI Caretaker Supplement

DHS, which administers the state's SSI activities, also administers the SSI Caretaker Supplement (CTS) program. DHS provides an additional monthly payment to help with the support of SSI recipients' dependent children. (See W-2 Manual Chapter 19.)

Transform Milwaukee Jobs Program

The Transform Milwaukee Jobs (TMJ) program serves low-income adults in Milwaukee County. It is a subsidized-employment program under which employers are reimbursed, or partially reimbursed, for wages and benefits for a maximum of 1,040 hours worked per participant. These subsidized job opportunities provide work experience, and employers are encouraged to hire participants into permanent jobs.

Eligible individuals must: be at least age eighteen (18), or if over age twenty-four (24), must be a biological or adoptive parent or primary caregiver of a child under age eighteen (18); not be participating in a W-2 paid placement; have an annual household income below one hundred fifty (150) percent of the federal poverty limit; have been unemployed for at least four weeks; and be ineligible to receive unemployment insurance benefits. The Transform Milwaukee Jobs program targets adults who are ex-offenders, ordered to pay child support, or involved with the Child Welfare system and in need of employment as part of a family reunification plan. The TMJ program also targets youth aged eighteen (18) through twenty-four (24) who were in the foster care system at or after age 16 and need to develop job skills and work experience to become self-supporting adults living independently.

Transitional Jobs Program

Under current state law, DCF may establish a program similar to the TMJ program outside of Milwaukee County if funding is available. The program outside Milwaukee County is named Transitional Jobs. The Transitional Jobs (TJ) program shares the same eligibility criteria and target populations as the TMJ program. The Department is required to give priority to areas of the state with relatively high rates of unemployment and childhood poverty, and to other areas with special needs determined by the Department. The TJ program is available in 15 counties (Adams, Ashland, Bayfield, Clark, Florence, Forest, Iron, Jackson, Juneau, Langlade, Menominee, Racine, Rusk, Sawyer, and Taylor) and the City of Beloit with a mix of rural and urban areas.

Wisconsin Community/Community-Building Milwaukee (CBM) Services Training Workshops

DCF contracts with Wisconsin Community Services to provide community-building facilitator-training workshops to organizations in the city of Milwaukee that work with needy individuals who are eligible for TANF programs. The CBM initiative aims to incorporate a powerful change process called Community Building into social service, criminal justice and faith-based community programs through Community Building Workshops. Community Building is an intense interpersonal group process and experience that promotes social and emotional learning and improves or builds on the core competencies of self-awareness, self-management, social awareness, relationship building, and responsible decision-making skills in participants.

Community Building Workshops are available for clients, community leaders, employees, and community members. These trainings last 2-3 days, typically involve 10-35 participants and two facilitators, and create an experience of unusual safety, allowing participants to address

unproductive attitudes and behaviors, and heal unresolved trauma and grief that may be driving current dysfunctional circumstances.

Fostering Futures; Connections Count

2015 Wisconsin Act 55 authorizes a new program under which DCF will contract with local organizations to employ trusted community members who will function as "community connectors" to connect vulnerable families with pre-school-aged children (0-5) with formal and informal community resources. 2017 Wisconsin Act 59 continued this funding and authorized an additional $200,000 in TANF funding to develop and implement a trauma-informed training curriculum that is more specific to Wisconsin's needs. Wis. Stat. §49.175(1)(n).

DCF has contracted with Wisconsin Literacy, Inc. through June 30, 2019. If funding continues to be made available, the contract provides for a potential two-year renewal. Wis. Stat. §49.169.

TANF CERTIFICATIONS

| The State Plan must include | Include |
|---|---|
| 1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act); | Yes |
| 2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act); | Yes |
| 3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and privatesector organizations (section 402(a)(4) of the Social SecurityAct)— | |
| 3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and | Yes |

| The State Plan must include | Include |
|---|---|
| 3. (B) have had at least 45 days to submit comments on the plan and the design of such services; | Yes |
| 4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act); | Yes |
| 5. Establish and enforce standards and procedures to ensure against program fraud and abuse,including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act); | Yes |
| 6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— | |
| 6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; | Yes |
| 6.ii. refer such individuals to counseling and supportive services; and | Yes |
| 6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence. | Yes |

## EMPLOYMENT AND TRAINING PROGRAMS UNDER THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (PROGRAMS AUTHORIZED UNDER SECTION 6(D)(4) OF THE FOOD AND NUTRITION ACT OF 2008 (7 U.S.C. 2015(D)(4)))

### A. GENERAL REQUIREMENTS [27]

#### 1. THE NATURE OF THE E&T COMPONENTS THE STATE AGENCY PLANS TO OFFER AND THE REASONS FOR SUCH COMPONENTS, INCLUDING COST INFORMATION. THE METHODOLOGY FOR STATE AGENCY REIMBURSEMENT FOR EDUCATION COMPONENTS MUST BE SPECIFICALLY ADDRESSED;

1. FSET vendors are fully reimbursed for all FSET expenses up to the contract limit. FSET vendors invoice DHS on a monthly basis and is reimbursed under “prompt pay” provisions. Administrative expenses are reimbursed from either 100% or 50% administration E&T grants, and pledge funding, if available. Participant expenses are reimbursed from 50% transportation/other or 50% dependent care E&T grants as appropriate. For certain services through local partnerships the contractor will provide the state share of the total cost.

Components by Category (*Non-Education, Non-Work Components; Education Components; Work Components)*

**Non-Education, Non-Work Components**

**Job Search Training**

Description: The job search training component is for participants who need general guidance with the job search process. Agencies assist job search training participants in developing and practicing applying job seeking skills with the goal of securing employment. This includes:

- Assistance with applications and resume development
- Interviewing skills, including mock interviewing

Level of Participant Effort: The duration of this component varies greatly depending upon the strengths and needs of the FSET participant. Time spent completing activities can range from 2 hours to 15 hours per week, for a time period of 1 to 12 weeks.

| Geographic area | Target audience (e.g., homeless, re-entry population, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 2,219 | $181,958 | Regional providers and tribal agencies | Number and percent of total job search training participants who obtained unsubsidized employment within the reporting period |

**Supervised Job Search**

Description: The supervised job search component is for participants engaged in employment search. Agencies assist job search participants in applying job seeking skills with the goal of securing employment. State approved locations for supervised job search vary by region. Regional vendors select the locations such as onsite computer labs and public libraries. Vendors supervise and track the time and activities of participants through job search logs and other direct forms of supervision. Case management is an integral part of all of our FSET components, including supervised job search. Case managers meet with supervised job search participants at least monthly (oftentimes weekly) to monitor and assist participants in their job search progress. Case managers and job developers also assist participants in the following ways:

- Assistance with applications and resume development
- Labor market information
- Job leads and job referrals
- Job development and job placement, as needed

Level of Participant Effort: This component typically entails approximately 12 contacts with employers per month for 2 months. Supervised Job search is not a qualifying component, but it can be offered as part of other FSET components as long as it comprises less than half of the total required time an ABAWD spends in FSET components. Job Search activities that precede a workfare assignment are considered part of the workfare component and do not have to be supervised.

-

| Geographic area | Target audience (e.g., homeless, re-entry population, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 6,174 | $753,303 | Regional providers and tribal agencies | Number and percent of total supervised job search participants who obtained unsubsidized employment within the reporting period |

**Education Components**

Description: All activities within the education component are qualifying activities. Educational activities must have a direct link to employment. Basic education activities include Adult Basic Education, Driver's Education, Customized Skills Training, Literacy Skills, Vocational Adult Basic Education, and Vocational Literacy.

Level of Participant Effort: This activity varies locally according to the length of appropriate and available courses and programs. The typical cohort model includes 12 hours of classroom program delivery per week for 20 weeks.

-

| Geographic area | Target audience (e.g., homeless, re-entry population, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 2,487 | $468,669 | Regional providers and tribal agencies | Number and percent of total education participants who obtained unsubsidized employment within the reporting period |

**English as a Second Language**

Description: All activities within the education component are qualifying activities. Educational activities must have a direct link to employment. English as a Second Language activities include English as a Second Language and Vocational English as a Second Language.

Level of Participant Effort: This activity varies locally according to the length of appropriate and available courses and programs. Programs vary in intensity ranging from 2 to 4 hours per day, 2 to 3 times per week, for 7 to 12 weeks.

| Geographic area | Target audience (e.g., homeless, re-entry population, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 146 | $50,712 | Regional providers and tribal agencies | Number and percent of total education participants who obtained unsubsidized employment within the reporting period |

**Career Planning**

Description: Career planning is intended for FSET participants exploring their career interests and advancement opportunities. Activities within the career planning component are qualifying activities and include occupational testing, career planning, and career advancement. FNS considers this activity "work readiness".

Level of Participant Effort: The duration of this component varies greatly depending upon the strengths and needs of the FSET participant. FSET vendors are encouraged to explore and engage participants in career planning activities when Employment Plans are developed and reviewed as needed, or at a minimum of once every 3 months.

| Geographic area | Target audience (e.g., homeless, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 1,695 | $138,990 | Regional providers and Tribal Agencies | Number and percent of total education participants who obtained unsubsidized employment within the reporting period |

**High School Equivalency Diploma**

Description: All activities within the education component are qualifying activities. Educational activities must have a direct link to employment. High School Equivalency Diploma activities include General Education Development and High School Equivalency Diploma. The High School Equivalency Diploma and General Educational Development are not entitlements in Wisconsin. FSET funds are used to pay for these activities after grants and other financial assistance options are exhausted.

Level of Participant Effort: This activity varies locally according to the length of appropriate and available courses and programs. The typical cohort model includes 12 hours of classroom program delivery per week for 20 weeks.

-

| Geographic area | Target audience (e.g., homeless, re-entry population, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 500 | $177,670 | Regional providers and tribal agencies | Number and percent of total education participants who obtained unsubsidized |

| Geographic area | Target audience (e.g., homeless, re-entry population, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| | | | | | employment within the reporting period |

**Higher Education**

Description: All activities within the education component are qualifying activities. Educational activities must have a direct link to employment. Higher Education activities include Full Time Student, Part Time Student, and Post-Secondary Ed (2 Years or Less).

Level of Participant Effort: Education and vocational training is short term competency based, with a hands-on experience emphasis and a quantifiable measurement of success. The duration of this activity will vary locally and by participant according to the length of appropriate and available courses and programs. Certificates are most often obtained by completing course work that can be completed within 2 to 12 months.

-

| Geographic area | Target audience (e.g., homeless, re-entry population, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 401 | $16,435 | Regional providers and tribal agencies | Number and percent of total education participants who obtained unsubsidized employment within the reporting period |

**Work Components**

**Workfare**

Description: Workfare provides participants the opportunity to learn new job skills and establish work references. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Workfare assignments may not replace or prevent regular employment and must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours.

Level of Participant Effort: A workfare participant may be initially assigned a 30-day job search period, which counts as a qualifying activity to meet the work requirement. A household's monthly workfare participation requirement is determined by dividing the monthly FoodShare benefit amount by the minimum wage.

-

| Geographic area | Target audience (e.g., homeless, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 255 | $31,327 | Regional providers and Tribal Agencies | Number and percent of total workfare participants who obtained unsubsidized employment within the reporting period |

**Work Experience**

Description: Allowable activities under the work experience component include: FSET work experience, community service (typically refers to agency placement of an FSET participant at a nonprofit agency to gain or enhance work skills needed for gainful employment and to obtain a job reference), transitional employment (co-enrollment), W-2 (co-enrollment), and trial job (co-enrollment). Transitional employment and trial job activities may be co-enrolled in programs operated by the Department of Corrections or with the Division of Vocational Rehabilitation.

These are qualifying activities that offer the opportunity for job shadowing or short-term placement in a work or training setting. The benefits of work experience include exposing participants to a variety of job options, improving employability, and helping ease the participant's transition into regular employment.

Level of Participant Effort: The number of hours and duration of this component varies depending upon the anticipated goal of engaging in the activity. Job shadowing may last several hours or several days depending upon the complexity of the job. A participant interested in obtaining a positive work reference may choose engage in this activity for 5 to 10 hours per week for 2 to 3 months.

-

| Geographic area | Target audience (e.g., homeless, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 749 | $165,118 | Regional providers and Tribal Agencies | Number and percent of total work experience participants who obtained unsubsidized employment within the reporting period |

**Self-Employment Training**

Description: The only activity within the self-employment training component is self-employment training. It is a qualifying activity in which FSET participants receive technical assistance for designing and operating their own business.

Individualized technical assistance is provided new and existing businesses in the following areas:

- Creating a business plan to develop or expand a small business
- Conducting feasibility studies to determine viability of the product or service
- Locating or maintaining financial resources, including low cost loans and grants
- Developing or expanding successful marketing strategies
- Resolving credit problems
- Navigating state and federal regulations

Level of Participant Effort: The length of participation is dependent upon the complexity of the business plan and the amount of technical assistance needed to develop and follow through with the plan.

-

| Geographic area | Target audience (e.g., homeless, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 98 | $40,016 | Regional providers and Tribal Agencies | Number and percent of total self-employment training participants who obtained unsubsidized employment within the reporting period |

**On-the-job Training**

Description: The only activity under the on-the-job training component is on-the-job training. It is a qualifying activity and may be assigned when a participant is in a paid job subsidized by a program other than FSET or W-2 including:

- Workforce Innovation and Opportunity Act (WIOA) on-the-job training
- Division of Vocational Rehabilitation (DVR) work experience
- Economic Dislocation and Worker's Adjustment Assistance Act (EDWAA) on-the-job training
- Adult Apprenticeship

Level of Participant Effort: The length of time spent in this component varies depending upon training goals and anticipated outcome. OJTs in the manufacturing and industry sector typically include Classroom and hands-on work experience for 4 to 8 hours per day, 4 to 5 days per week for 4 to 16 weeks.

-

| Geographic area | Target audience (e.g., homeless, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 21 | $650 | Regional providers and Tribal Agencies | Number and percent of total OJT participants who obtained unsubsidized employment within the reporting period |

**Job Retention**

Description: Job retention includes job retention reimbursement for reasonable and necessary expenses to assist individuals in maintaining employment, and case management services that address workplace demands and employer expectations. FSET staff currently offer job retention for 90 days. The Feb 2020 FSET Handbook release will instruct workers not to disenroll participants from job retention prior to 30 days. FSET workers currently reach out to participants at least monthly to all job retention participants. At orientation and ongoing case management appointments case managers discuss the benefits of job retention services with FSET participants.

Level of Participant Effort: A minimum of 1 hour per month of engagement for up to but no more than 90 days for employment obtained as a result of FSET participation.

| Geographic area | Target audience (e.g., homeless, ABAWDS) | Anticipated monthly participants (unduplicated count) | Anticipated monthly cost* | Provider(s) | Reporting measure(s) if > 100 participants per year |
|---|---|---|---|---|---|
| Statewide | ABAWDS and non-ABAWDS | 2,204 | $180,728 | Regional providers and Tribal Agencies | Number of individuals who actively complete 90 days of job retention and are employed within the reporting period |

*Anticipated monthly costs are limited to administrative costs only. Participant reimbursement is not included. (Applies to all tables).

2. AN OPERATING BUDGET FOR THE FEDERAL FISCAL YEAR WITH AN ESTIMATE OF THE COST OF OPERATION FOR EACH FEDERAL FISCAL YEAR COVERED BY THE COMBINED PLAN. ANY STATE AGENCY THAT REQUESTS 50 PERCENT FEDERAL REIMBURSEMENT FOR STATE AGENCY E&T ADMINISTRATIVE COSTS, OTHER THAN FOR PARTICIPANT REIMBURSEMENTS, MUST INCLUDE IN ITS PLAN, OR AMENDMENTS TO ITS PLAN, AN ITEMIZED LIST OF ALL ACTIVITIES AND COSTS FOR WHICH THOSE FEDERAL FUNDS WILL BE CLAIMED, INCLUDING THE COSTS FOR CASE MANAGEMENT AND CASEWORK TO FACILITATE THE TRANSITION FROM ECONOMIC DEPENDENCY TO SELF-SUFFICIENCY THROUGH WORK. COSTS IN EXCESS OF THE FEDERAL GRANT WILL BE ALLOWED ONLY WITH THE PRIOR APPROVAL OF FNS AND MUST BE ADEQUATELY DOCUMENTED TO ASSURE THAT THEY ARE NECESSARY, REASONABLE AND PROPERLY ALLOCATED. A STATE MUST SUBMIT A PLAN AMENDMENT TO REQUEST BUDGET ADJUSTMENTS AT LEAST 30 DAYS PRIOR TO PLANNED IMPLEMENTATION;

1. DHS submits an FSET State Plan that includes an operating budget every Federal Fiscal Year (FFY). For that reason DHS does not have an estimate of costs of operation beyond FFY2020. The following is the Operating Budget for FFY2020. Wisconsin's FSET operating budget does not meet the criteria to require itemization of 50 percent Federal reimbursement costs.

| | State cost | Federal cost | Total |
|---|---|---|---|
| **I. Direct Costs**: | | | |
| a) Salary/Wages | $0 | $469,690 | $469,690 |
| b) Fringe Benefits* Approved Fringe Benefit Rate Used 43.94 % | $0 | $200,792 | $200,792 |
| c) Contractual Costs (Admin Only) | $16,398,460 | $17,090,340 | $33,488,800 |
| d) Non-capital Equipment and Supplies | $0 | $237,500 | $237,500 |
| e) Materials | | | |

| | State cost | Federal cost | Total |
|---|---|---|---|
| f) Travel | $0 | $24,300 | $24,300 |
| g) Building/Space | $0 | $0 | $0 |
| h) Equipment & Other Capital Expenditures | $0 | $0 | $0 |
| **Total Direct Costs** | $16,398,460 | $18,022,622 | $34,421,082 |
| **II. Indirect Costs:** | | | |
| Indirect Costs*Approved Indirect Cost Rate Used: 6.73 % | $0 | $31,610 | $31,610 |
| **III. In-kind Contribution** | | | |
| State in-kind contribution | $0 | $0 | $0 |
| **Total Administrative Cost (Total of items I, II, and III)** | $16,398,460 | $18,054,233 | $34,452,693 |
| *100 Percent Federal E&T Grant* | | $1,655,772 | $1,655,772 |
| *100 Percent Federal Pledge Funding* | | $1,246,753 | $1,246,753 |
| *50 percent Additional Administrative Expenditure* | $16,398,460 | $16,398,461 | $32,796,921 |
| **IV. Participant Reimbursement (State plus Federal):** | | | |
| a) Dependent Care (including contractual costs) | $245,500 | $245,500 | $491,000 |
| b) Transportation & Other Costs (including contractual costs) | $2,266,900 | $2,266,900 | $4,533,800 |
| c) State Agency Cost for Dependent Care Services | $0 | | $0 |
| *Total 50 percent Participant Reimbursement Expenses* | $2,512,400 | $2,512,400 | $5,024,800 |
| **V. Total Costs** | $18,910,860 | $21,813,386 | $40,724,246 |

3. THE CATEGORIES AND TYPES OF INDIVIDUALS THE STATE AGENCY INTENDS TO EXEMPT FROM E&T PARTICIPATION, THE ESTIMATED PERCENTAGE OF WORK REGISTRANTS THE STATE AGENCY PLANS TO EXEMPT, AND THE FREQUENCY WITH WHICH THE STATE AGENCY PLANS TO REEVALUATE THE VALIDITY OF ITS EXEMPTIONS;

1. The State of Wisconsin's entire FSET population is voluntary. As such, DHS exempts 100% of all work registrants from required E&T participation.

4. THE CHARACTERISTICS OF THE POPULATION THE STATE AGENCY INTENDS TO PLACE IN E&T;

is an employment and training program that is available to all FoodShare recipients in Wisconsin. The State of Wisconsin's entire FSET population is voluntary. Wisconsin income maintenance (IM) agencies have the systematic ability to refer FoodShare applicants prior to eligibility determination; however, FSET agencies do not serve applicants referred prior to

eligibility determination or categorically eligible, zero benefit households until the household/applicant begins receiving FoodShare benefits.

5. THE ESTIMATED NUMBER OF VOLUNTEERS THE STATE AGENCY EXPECTS TO PLACE IN E&T;

8300

6. THE GEOGRAPHIC AREAS COVERED AND NOT COVERED BY THE E&T PLAN AND WHY, AND THE TYPE AND LOCATION OF SERVICES TO BE OFFERED;

1. Wisconsin's FSET program is available statewide and operated regionally. Wisconsin's FSET program offers an array of employment and training services intended to facilitate an efficient use of resources to assist FSET participants to move promptly into unsubsidized employment. Services are designed to comply with federal and state policies and regulations, and are in accordance with Wisconsin's federally-approved FSET State Plan. Allowable FSET program components include supervised job search, job search training, work experience, workfare, education and vocational training, self-employment training, and job retention services (WI FSET Handbook 1.4). While the regional FSET vendors have considerable flexibility in developing their program, all components are offered in all FSET regions.

7. THE METHOD THE STATE AGENCY USES TO COUNT ALL WORK REGISTRANTS AS OF THE FIRST DAY OF THE NEW FISCAL YEAR;

1. FoodShare IM agencies work register all FoodShare members who are not exempt from the FoodShare work requirements at the time of initial certification, renewal, and in any additional situations as needed. Each Federal fiscal year, Wisconsin DHS produces a count of all FoodShare work registrants as of October 1 of the new fiscal year. This count is reported on Line 1 of the Q1 FNS-583 report.

8. THE METHOD THE STATE AGENCY USES TO REPORT WORK REGISTRANT INFORMATION ON THE QUARTERLY FORM FNS–583;

1. Wisconsin's eligibility system (CARES) captures individual financial and non-financial eligibility information. For cases that are eligible for FoodShare in the month of October, DHS identifies all individuals in the household between ages of 16 through 59 who are determined eligible for FoodShare and who do not meet an exemption from the FoodShare work requirement under 7 CFR 273.7.

9. THE METHOD THE STATE AGENCY USES TO PREVENT WORK REGISTRANTS FROM BEING COUNTED TWICE WITHIN A FEDERAL FISCAL YEAR. IF THE STATE AGENCY UNIVERSALLY WORK REGISTERS ALL SNAP APPLICANTS, THIS METHOD MUST SPECIFY HOW THE STATE AGENCY EXCLUDES THOSE EXEMPT FROM WORK REGISTRATION UNDER 7 C.F.R. §273.7(B)(1). IF THE STATE AGENCY WORK REGISTERS NONEXEMPT PARTICIPANTS WHENEVER A NEW APPLICATION IS SUBMITTED, THIS METHOD MUST ALSO SPECIFY HOW THE STATE AGENCY EXCLUDES THOSE PARTICIPANTS WHO MAY HAVE ALREADY BEEN REGISTERED WITHIN THE PAST 12 MONTHS AS SPECIFIED UNDER 7 C.F.R. §273.7(A)(1)(I);

To prevent duplicate counting, each month CARES creates a file of individual work registrants for the particular month. In the next month, the program uses individual, system-generated PIN

numbers of all prior month's files to re-determine who has not been counted in the current month. The file series starts again each October.

10. THE ORGANIZATIONAL RELATIONSHIP BETWEEN THE UNITS RESPONSIBLE FOR CERTIFICATION AND THE UNITS OPERATING THE E&T COMPONENTS, INCLUDING UNITS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM, IF AVAILABLE. FNS IS SPECIFICALLY CONCERNED THAT THE LINES OF COMMUNICATION BE EFFICIENT AND THAT NONCOMPLIANCE BY THE PARTICIPANT BE REPORTED TO THE CERTIFICATION UNIT WITHIN 10 WORKING DAYS AFTER THE NONCOMPLIANCE OCCURS;

1. Income maintenance (IM) workers (eligibility workers) are responsible for determining ABAWD status and referring FoodShare members to the FSET program. ABAWDs may choose to meet the ABAWD work requirement through participation in E&T. Non-ABAWDs may participate in FSET, but do not need to meet the ABAWD work requirement. Non-ABAWDs are not subject to time-limited FoodShare benefits (TLBs). IM workers are instructed to ask non-ABAWDs if they would like to be voluntarily referred to the FSET program. All ABAWDs subject to the time limit receive a systematic referral to the voluntary FSET program.

Additionally, IM workers are responsible for taking the following actions relating to FoodShare eligibility:

- **Determine Exemptions from the ABAWD Work Requirement:** IM workers have primary responsibility for determining and verifying ABAWD exemptions. However, FSET workers must understand ABAWD exemptions and be aware of changes in participants' ABAWD exemptions. FSET workers may identify that an individual qualifies for an ABAWD exemption once they begin working with a participant. When an ABAWD exemption is identified, the FSET worker must notify the IM agency of the exemption and work with the participant to initiate the process of verifying the exemption.
- **Provide FSET Information to FoodShare Applicants and Member: IM workers are responsible for providing information about the FSET program to all FoodShare applicants and members during the FoodShare interview process at application and renewal, including:**
    - **Explaining the benefits of the FSET program including a brief overview of the available employment and training opportunities and supportive services.**
    - **Explaining how the FSET program can help an ABAWD meet the monthly ABAWD work requirement, in order to maintain ongoing FoodShare benefits.**
    - **Asking ABAWDs meeting the work requirement and non-ABAWDs if they would like to be referred to the FSET program.**

FSET workers use the FSET Tool within the CARES Worker Web (CWW) system. CWW is also the system used for determining FoodShare eligibility. FSET workers have specific deadlines

that they must meet each month to ensure timely submission of FSET participation hours. For example, here are a few important deadlines that FSET workers must meet:

**FSET Worker Time Frames**

| Time Frames | Importance |
|---|---|
| 5th of the month | • Update the "Work Requirement Met" field indicating the prior month's participation. |
| 2nd Saturday of the month | • Update the "Anticipated to Meet Work Requirement" field.<br>• CARES Worker Web (CWW) pulls information from the "Work Requirement Met" field and uses it to update the FoodShare clock. |
| Adverse Action | • CWW pulls information from the "Anticipated to Meet Work Requirement" field and uses it to update the FoodShare clock. |

11. THE RELATIONSHIP BETWEEN THE STATE AGENCY AND OTHER ORGANIZATIONS IT PLANS TO COORDINATE WITH FOR THE PROVISION OF SERVICES, INCLUDING ORGANIZATIONS IN THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM, IF AVAILABLE. COPIES OF CONTRACTS MUST BE AVAILABLE FOR INSPECTION;

DHS operates a regionalized, county-administered program. Regional service area boundaries correspond with the State's eleven Workforce Development Areas (WDAs). FSET regionalization along WDA boundaries opens opportunities for collaboration and creates efficiencies in service delivery between FSET and other employment and training programs by taking advantage of the WDA's unique expertise and pre-established relationships with local employers and businesses. Each region establishes formal (subcontractors, third-party partners, work experience, and workfare sites) and informal relationships with local organizations and businesses. Wisconsin's FY2020 FSET State Plan that includes all subcontractors and third-party partners has been approved by FNS.

Each region contains at least one FSET office that is co-located at a Job Center of Wisconsin. When the FSET office is co-located at a Job Center, FSET participants have access to activities coordinated by the Job Center such as employer events, job fairs, and trainings. ABAWDs can meet their work requirement by participating in WIOA and other work programs. If an ABAWD is meeting the ABAWD work requirement through WIOA or another allowable work program, then the Income Maintenance (IM) worker (eligibility worker) notes this on the case. If an ABAWD is meeting the ABAWD work requirement through a combination of FSET participation and WIOA participation, FSET and WIOA staff collaborate to create employment plans, track participation hours, and avoid duplication of services. The FSET program and WIOA programs have formal agreements to share participant information.

In addition to the eleven FSET regions, the State contracts separately with eight Wisconsin Tribes including Bad River Tribe, Lac du Flambeau Tribe, Menominee Tribe, Oneida Tribe, Potawatomi Tribe, Red Cliff Tribe, Sokaogon Tribe, and Stockbridge Munsee Community to operate independent FSET programs. This allows Tribes the opportunity to provide their members with a choice in where they receive FSET services, either through their Tribal FSET provider or from the FSET service provider operating within the region in which they reside.

12. THE AVAILABILITY, IF APPROPRIATE, OF E&T PROGRAMS FOR INDIANS LIVING ON RESERVATIONS AFTER THE STATE AGENCY HAS CONSULTED IN GOOD FAITH WITH APPROPRIATE TRIBAL ORGANIZATIONS;

The State of Wisconsin allows tribes to operate independent E&T programs. Additionally, tribal members may choose to participate in their tribal FSET program or the FSET program operated by the vendor in the region of the State in which they live. The State conducts monthly calls with vendors, including tribal organizations, to share information regarding FSET policy and best practices. The State continues to try to engage tribal vendors during these calls regarding the E&T program.

13. IF A CONCILIATION PROCESS IS PLANNED, THE PROCEDURES THAT WILL BE USED WHEN AN INDIVIDUAL FAILS TO COMPLY WITH AN E&T PROGRAM REQUIREMENT. INCLUDE THE LENGTH OF THE CONCILIATION PERIOD; AND

The conciliation process does not apply to Wisconsin due to our voluntary E&T status.

14. THE PAYMENT RATES FOR CHILD CARE ESTABLISHED IN ACCORDANCE WITH THE CHILD CARE AND DEVELOPMENT BLOCK GRANT PROVISIONS OF 45 CFR 98.43, AND BASED ON LOCAL MARKET RATE SURVEYS.

DHS operates a regionalized, county-administered program. Regional service area boundaries correspond with the State's eleven Workforce Development Areas (WDAs). In addition to the eleven FSET regions, the State contracts separately with eight Wisconsin Tribes including Bad River Tribe, Lac du Flambeau Tribe, Menominee Tribe, Oneida Tribe, Potawatomi Tribe, Red Cliff Tribe, Sokaogon Tribe, and Stockbridge Munsee Community to operate independent FSET programs. This allows Tribes the opportunity to provide their members with a choice in where they receive FSET services, either through their Tribal FSET provider or from the FSET service provider operating within the region in which they reside.

Administering reimbursement for participants' allowable FSET expenses is the responsibility of the regional providers and Tribal agencies. Each FSET provider establishes reimbursement rates for child care on an individualized basis for each participant within their approved annual FSET budget. The budged amounts reflect current dependent care spending trends. FSET providers can request additional reimbursement funds, if needed, throughout the year. The current statewide budget totals $491,000 for child care reimbursements.

Wisconsin's FY2020 FSET State Plan which includes total participant reimbursement costs has been approved by FNS.

15. THE COMBINED (FEDERAL/STATE) STATE AGENCY REIMBURSEMENT RATE FOR TRANSPORTATION COSTS AND OTHER EXPENSES REASONABLY NECESSARY AND DIRECTLY RELATED TO PARTICIPATION INCURRED BY E&T PARTICIPANTS. IF THE STATE AGENCY PROPOSES TO PROVIDE DIFFERENT REIMBURSEMENT AMOUNTS TO ACCOUNT FOR VARYING LEVELS OF EXPENSES, FOR INSTANCE FOR GREATER OR LESSER COSTS OF TRANSPORTATION IN DIFFERENT AREAS OF THE STATE, IT MUST INCLUDE THEM HERE.

DHS operates a regionalized, county-administered program. Regional service area boundaries correspond with the State's eleven Workforce Development Areas (WDAs). In addition to the eleven FSET regions, the State contracts separately with eight Wisconsin Tribes including Bad River Tribe, Lac du Flambeau Tribe, Menominee Tribe, Oneida Tribe, Potawatomi Tribe, Red Cliff Tribe, Sokaogon Tribe, and Stockbridge Munsee Community to operate independent FSET programs. This allows Tribes the opportunity to provide their members with a choice in where they receive FSET services, either through their Tribal FSET provider or from the FSET service

provider operating within the region in which they reside.

Administering reimbursement for participants' allowable FSET expenses is the responsibility of the regional providers and Tribal agencies. Each FSET provider establishes reimbursement rates for participant reimbursements that fit within their approved annual FSET budget. FSET providers can request additional reimbursement funds, if needed, throughout the year. The current statewide budget totals $4,533,800 for participant reimbursements.

Wisconsin's FY2020 FSET State Plan which includes total participant reimbursement costs has been approved by FNS.

16. INFORMATION ABOUT EXPENSES THE STATE AGENCY PROPOSES TO REIMBURSE. FNS MUST BE AFFORDED THE OPPORTUNITY TO REVIEW AND COMMENT ON THE PROPOSED REIMBURSEMENTS BEFORE THEY ARE IMPLEMENTED.

Supportive services (participant reimbursements) are provided to FSET participants if the reimbursement is reasonable and necessary and directly relates to FSET participation in accordance with Section 5.1 of the State of Wisconsin, Department of Health Services FSET Handbook (http://www.emhandbooks.wisconsin.gov/fset/fset.htm). Allowable types of supportive services are listed in the following table and in Appendix D of the State of Wisconsin, Department of Health Services FSET Handbook. Supportive services are provided by the FSET agencies in a variety of ways. Most commonly, FSET agencies pay the upfront costs for the supportive services. However, if a participant pays for a good or service that qualifies as a supportive service with his or her own funds, the FSET agency can reimburse the participant for their expenses. When an FSET agency reimburses a participant for a supportive service, the FSET agency will confirm that the participant's claimed costs match actual costs.

| **Item** | **Almost Always** | **Sometimes** | **Never** | **Other Details** |
|---|---|---|---|---|
| Auto insurance | | | X | |
| Auto ownership tag, title, licensing | | X | | Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention. |
| Auto purchase | | | X | |
| Auto repairs | | X | | Only under specific conditions* |
| Background checks | | X | | Only if required for employment and training. |
| Books | X | | | |
| Clothing for job interview | X | | | |
| Clothing required for a job | | X | | Uniforms almost always. Otherwise clothing costs are limited and must be reasonable and necessary for employment as a part of job retention. |

| Item | Almost Always | Sometimes | Never | Other Details |
|---|---|---|---|---|
| Commercial driver's license | | X | | Only if required for employment. |
| Computers, laptops, etc. | | | X | |
| Course registration fees | X | | | |
| Dental work | | X | | To the extent that it is required for employment and as funds allow for reimbursement. Dental work costs are limited to minor work, such as a cleaning. Major work, such as oral surgery, bridge work, braces, and dentures, are not allowable expenses. |
| Dependent care costs | X | | | |
| Driver license applications and renewal fees | | X | | Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention. |
| Drug/alcohol counseling | | | X | Refer participant to another agency. |
| Drug tests | | X | | Only if required for employment. |
| Equipment | | X | | Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention. |
| Fines | | | X | No exceptions for any type. |
| Fingerprinting | | X | | Only if required for employment. |
| Gas | X | | | |
| Legal services | | X | | Must be very minor (i.e. notary) and directly related to employment. |
| Licensing and bonding fees for work or work experience | X | | | |
| Living expenses and stipends | | | X | |
| Medical expense | | X | | Only if minor and required for employment, such as a tuberculosis test. |

| Item | Almost Always | Sometimes | Never | Other Details |
|---|---|---|---|---|
| Mental health counseling or treatment | | | X | Refer participant to appropriate agency. |
| Relocation expenses | | X | | Must be reasonable and necessary for employment as part of a job retention component. |
| Safety items (on the job) | X | | | |
| Student activity fees | | X | | Only if required to participate in class. |
| Student loans | | | X | Participants should apply for financial aid. |
| Taxi driver's license | | X | | Only if required for employment. |
| Test fees | | X | | Must be directly applicable to employment and all other funding sources exhausted. |
| Temporary housing | | X | | Housing assistance may be provided on a case-by-case basis for emergency situations, and only when all other funding sources have been exhausted. The rationale for housing assistance must also be documented in PIN comments in the FSET Tool. Housing assistance may be provided for a period of one month maximum per an individual's FS eligibility period. |
| Tools | | X | | Must be reasonable and necessary for participation in an employment and training component or employment as part of job retention. |
| Training materials | X | | | |
| Transportation expenses (gas, bus fare) | X | | | |
| Tuition and fees | | X | | Should not supplant other sources of funding like grants or scholarships. |
| Uniforms | X | | | |
| Union dues | | X | | Only if required for employment. |
| Vision needs (glasses or eye exam) | | X | | Must be reasonable and necessary for participation in an employment and training |

| Item | Almost Always | Sometimes | Never | Other Details |
|---|---|---|---|---|
| | | | | component or employment as a part of job retention. |

B. ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD) [28]

1. ITS PLEDGE TO OFFER A QUALIFYING ACTIVITY TO ALL AT-RISK ABAWD APPLICANTS AND RECIPIENTS;

**Wisconsin's approved FY2020 FSET State Plan included the following pledge:**

**Wisconsin is seeking Pledge status for FFY 2020. Effective October 1, 2020, Wisconsin pledges that, through its FSET program, the State will offer a qualifying education, training, or workfare activity to each at-risk ABAWD FoodShare member in his or her third time-limited benefit month.**

**Pledge services will be offered across the entire state.**

2. ESTIMATED COSTS OF FULFILLING ITS PLEDGE;

**In Wisconsin's approved FY 2020 FSET State Plan, DHS estimated that it would cost approximately $3,391,900 to fulfill the Pledge.**

The total cost to fulfill the Pledge is a combination of two factors:

1. The estimated per member cost, based upon FFY2019 estimate ($317/member).

2. The number of potential at-risk ABAWDS expected in the State during FFY 2020 (10,700).

Multiplying these two numbers together yields a total of $3,391,900.

3. A DESCRIPTION OF MANAGEMENT CONTROLS IN PLACE TO MEET PLEDGE REQUIREMENTS;

**Wisconsin has implemented a host of new management controls to ensure that the pledge to serve all at-risk ABAWDs is met. These include contractually-defined service delivery expectations, more comprehensive quarterly reporting requirements, and greater contract monitoring and compliance safeguards. Vendor contracts for each FSET Region identify the special needs of its ABAWD and non-ABAWD population in their geographic region and detail a plan for addressing those needs through delivery of targeted FSET services and building collaborative partnerships with other entities. These plans have been used to develop contract compliance measures.**

4. A DISCUSSION OF ITS CAPACITY AND ABILITY TO SERVE AT-RISK ABAWDS;

**Wisconsin consists of 11 FSET administrative Regions, which mirror WDA regional boundaries. Each FSET Region administers and delivers FSET services within the region by partnering with local service providers and community organizations. In addition, eight Wisconsin Tribes operate independent FSET programs, in order to provide culturally-competent services specific to tribal members. This administrative**

**organization affords the State the opportunity to leverage economies of scale, resulting in greater program administrative efficiencies. Each regional FSET vendor has the capacity to offer FSET components to all ABAWD and voluntary FoodShare members within the contract region. FSET vendors are contractually obligated to provide qualifying activities by which ABAWDs can meet the work requirement. In fact, the State requires each region to offer multiple qualifying components for ABAWDs, including Education and Vocational Training, Work Experience, Workfare, and Self-Employment Training. Supervised Job Search and Job Search training are also offered across regions, but are considered a qualifying activity for ABAWDs only when participation in these components comprises less than half of the ABAWD's total participation requirement.**

**After an ABAWD has exhausted two countable months, Wisconsin sends a letter notifying the ABAWD that he or she is not currently meeting the ABAWD work requirement. The notice further states that if the ABAWD does not start meeting the work requirement or meet an exemption from the work requirement, that he or she will use up his or her three time-limited benefit months, and his or her FoodShare benefits will end. The letter explains that one way the ABAWD can meet the work requirement is by taking part in the FoodShare Employment and Training (FSET) program. It describes the FSET program as a free program that can help an individual build job skills and find employment. The letter provides a phone number and link to the Wisconsin DHS website for any questions regarding FSET. Additionally, the letter explains the different ways to meet the ABAWD work requirement and lists the ABAWD exemptions.**

5. INFORMATION ABOUT THE SIZE AND SPECIAL NEEDS OF ITS ABAWD POPULATION; AND

**In Wisconsin's approved FY 2020 FSET State Plan, DHS anticipated that there would be approximately 10,700 ABAWDs in the State during FFY 2020, all of whom will be referred to FSET. Although FSET remains a voluntary program and ABAWDs may choose not to participate, the State has developed an FSET referral and outreach process that maximizes opportunities for ABAWDs to participate in FSET and meet the work requirement.**

6. INFORMATION ABOUT THE EDUCATION, TRAINING, AND WORKFARE COMPONENTS IT WILL OFFER TO MEET THE ABAWD WORK REQUIREMENT

The following program components are designed to provide meaningful opportunities to facilitate and enhance the employability of FSET participants:

- Supervised Job Search and Job Search Training
- Work Experience
- Workfare
- Education and Vocational Training
- Self-Employment Training
- Job Retention

FSET participants must agree to participate in at least one approved component in order to remain enrolled in FSET. ABAWDs must participate in qualifying activities in

order to meet the work requirement. As previously mentioned, Supervised Job Search and Job Search Training are qualifying activities for ABAWDs only when less than half of the individual's total participation requirement is met through these activities. However, when offered under WIOA, such as career development and training programs for adults and dislocated workers, or under section 236 of the Trade Act, which includes federally-funded employment programs for workers that have or who are at risk of losing employment, Supervised Job Search and Job Search Training are considered qualifying activities for meeting the ABAWD work requirement. Work Experience, Workfare, Education and Vocational Training, and Self-Employment Training are also qualifying activities for ABAWDs.

As specified in 7 CFR 273.24 and 7 CFR 273.7(f), participation in other allowable work programs counts toward meeting the work requirement, including:

- A program under the Workforce Innovation and Opportunity Act (Pub. L. 113-128);
- A program under section 236 of the Trade Act of 1974 (19 U.S.C. 2296); and
- Another State-operated or supervised employment and training program, other than job search or job search training (these components can be offered as subsidiary components, but must comprise less than half of an individual's participation hours).

ABAWDs who are not currently working may participate in FSET as a way to meet the work requirement. These individuals should participate in FSET for at least 80 hours per month, or an average of 20 hours per week, to maintain ongoing eligibility for FoodShare beyond the three time-limited benefit months.

ABAWD FoodShare members who are currently working, but whose work hours total less than 80 hours a month, will be referred to FSET. These individuals may meet the work requirement through a combination of working and participating in FSET. For these cases, the number of FSET participation hours will differ based on an individual's other work hours. The minimum suggested monthly FSET participation hours will equal the difference between 80 hours and the individual's monthly work hours (e.g. 80 hours – 40 work hours per month = 40 FSET participation hours per month). To maintain enrollment, non-ABAWD FSET participants need to put forth a minimum effort by participating in FSET activities for at least 12 hours per month for two consecutive months.

## TRADE ADJUSTMENT ASSISTANCE (TAA)

Yes

## JOBS FOR VETERANS' STATE GRANTS

### A. HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG;

Wisconsin's JVSG DVOP staff provide individualized career services to SBEs (veterans significant barriers to employment) and other eligible individuals. The JVSG staff provide services to eligible veterans through a statewide network of DVOP and LVER staff. DVOPs provide comprehensive assessment, career guidance, individualized employment plans, staff assisted service, labor market information, referrals to supportive services, and other basic staff assisted career services. DVOPs conduct outreach and follow-up using a case managed approach. LVERs

perform a wide range of duties on behalf of our veterans specifically related to outreach to the employer community and facilitation within Wisconsin's employment service delivery system.

LVERs plan and participate in job and career fairs, conduct employer outreach, work with employers conducting job searches and workshops, and establish job search groups. They also coordinate with unions, apprenticeship programs, and businesses or business organizations to promote and secure employment and training programs for veterans, inform federal contractors of the process to recruit qualified veterans, and participate with other business outreach efforts.

JVSG staff work with partner agencies and programs to assure that priority of service is provided to veterans. Working closely with partner agencies assures there is not duplication of services and that veterans receive all services that they are eligible and qualified to receive. LVERs are members of the local business services team. LVERs also work with employers so that veterans become employed.

B. THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE; SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH CURRENT GUIDANCE;

Wisconsin's JVSG staff have distinct duties and roles and responsibilities for the DVOP and the LVER staff. The DVOP provides individualized career services to meet the employment needs of veterans with a significant barrier to employment as identified by DOLVETs guidance. These service categories will be adjusted to comply with subsequent guidance from DOL during the life of this planning cycle.

**Populations served by the DVOP are:**

- A special disabled or disabled veteran;
- Viet Nam era Veteran;
- A homeless person, as defined in Sections 103(a) and (b)the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b», as amended;
- A recently separated service member who during the previous 12 months has been unemployed for more than 27 weeks;
- An offender, a veteran, who is incarcerated or was released from incarceration;
- A veteran lacking a high school diploma or equivalent;
- A veteran defined as low income by WIOA;
- Any veteran aged 18 to 24 who would benefit from individualized career services;
- Transitioning members of the Armed Forces who have been identified as in need of individualized career services;
- Members of the armed forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units and spouses or other family caregivers of such wounded ill, or injured members;
- Other eligible veterans as defined under 38 U.S.C. 4211(4); Eligible veteran means a person who: Served on active duty for a period of more than 180 days and was

discharged with other than a dishonorable discharge; was discharged or released from active duty because of a service-connected disability; and

- As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; or was discharged or released from active duty by reason of a sole survivorship discharge.

**The DVOP duties, to the case managed populations served, include:**

- Conduct comprehensive assessment to identify barriers, education and skill levels;
- Develop individualized employment plan with the client to identify the strategies to overcome barriers and to find employment;
- Conduct follow-up to determine progress in achieving employment and adjust the IEP as needed.
- Provide labor market information;
- Provide basic job search assistance;
- Document and record all activity using the State of Wisconsin approved computer-based case management system. Paper case management folders are used for documents such as DD214s, certifications and Chapter 31 related information;
- As appropriate, make referrals to other agencies, supportive services, counseling, testing or job search workshops;
- Assist the veteran in employment seeking activities through preparation of resumes, cover letters and application forms; instruct in use of internet and/or JCW, and access to other materials and information, such as labor market analysis;
- Develop strong linkages with partner agencies to assure that there is an agreed understanding of the roles and responsibilities of the DVOP and partner staff in providing services to veterans, and
- Coordinate with LVERs to refer veterans to job openings.

The LVER promotes to employers, employer associations, and business groups the advantages of hiring veterans and is a member of the job center business service team as identified in 38 U.S.C.4104(B). These service categories will be adjusted to comply with subsequent guidance from DOL during the life of this planning cycle.

**The LVER duties include:**

- Planning and participating in job and career fairs;
- Serving as an active member of the job center and/or regional employer service team;
- Conducting employer outreach;
- In conjunction with employers, conducting job searches and workshops;
- Coordinating with unions, apprenticeship programs, businesses or business organizations to promote and secure employment and training programs for veterans;

- Promoting credentialing and licensing opportunities for veterans;
- Informing Federal contractors of the process to recruit qualified veterans; and
- Submitting quarterly reports on program activities to Regional Supervisors, the Director of OVES, and to the DOL/VETS State Director.

C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR AMERICAN JOB CENTER;

Wisconsin LVER and DVOP staff are integrated within the one-stop job center/career center network throughout the State of Wisconsin. LVERs are participating members of the job center business service teams. DVOPs partner with WIOA staff in, Wagner-Peyser, Vocational Rehabilitation, and other center-based partner agencies, to develop employment plans and return veterans to self-sufficiency. DVOPs provide case management services for co-enrolled veterans served by the Homeless Veteran Reintegration Program.

Veteran service staff also partner with numerous non-job center-based service providers. LVER and DVOP staff partner Wisconsin Department of Veteran Affairs, city and county government agencies, veteran chamber of commerce, community- based organizations, veteran organizations, Veteran groups at universities and colleges.

D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

The State of Wisconsin OVES has an Incentive Award program in place. In FFY 2020 and subsequent years 1% of the grant allocation will be set aside for the Incentive awards for the purposes of performance incentive awards for eligible employees and employment service offices. The incentive awards program was established to:

(a) encourage the improvement and modernization of employment, training, and placement services for veterans; and

(b) recognize eligible employees and employment service offices for excellence in the provision of such services, or for having made demonstrable improvements in the provision of services to veterans.

**Eligibility and Selection Criteria** Title 38, Section 4112 (d) as amended by P.L. 109-461 the *Veterans Benefits, Health Care and Informational Technology Act of 2006*, grants provide authority to recognize eligible employees or offices that provide exemplary employment services to veterans or to effect improvements and modernization of their veterans' employment service delivery methods.

a. **Eligibility** *Individual*: Eligible recipients for individual incentive awards are Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment Representative (LVER) staff, Consolidated positions and any other individual who provides employment, training, and placement services to veterans under the Workforce Innovation and Opportunity Act (WIOA), include labor exchanges funded by the Wagner-Peyser Act or staff of American Job Center partner agencies. The committee will not restrict awarding individuals who collectively serve a specific function or work in an area where their performance warrants recognition under a state's incentive awards program. Volunteers, U.S. Department of Veterans Affairs Work Study participants, and Federal employees are <u>not</u> eligible recipients.

*Employment Service Offices*: Public Law 109-461 Sec. 603 expands the recipient eligibility for performance incentive awards to include "employment service offices." Offices eligible to

receive incentive awards include any service delivery point that provides exemplary public employment and training services to veterans; American Job Centers operated by State Workforce Agencies or offices that contract with State, Regional, or Local Workforce Development Boards; and other agencies identified in Section 121(b)(2)(B) of WIOA that provide services to veterans. Per Public Law 109-461 Sec. 603, incentive awards may be used by employment service office recipients for any purpose.

Discretion will be used when deciding whether an award should be presented to an entire office rather than select individuals serving a common function within an office. Awards to offices should be reserved for instances where most, if not all, employees in an office contribute to improving employment or training services offered and provided to veterans.

b. **Selection and Criteria for Selection** A selection committee of Wisconsin DWD/DET/JVSG Leadership will be used to determine recipients of incentive award.

Written nominations for the incentive awards will be evaluated by a committee. Emphasis will be placed on activity that foster or strengthen partnerships at the state and local level. Selection criteria for award recipients will be based on performance and activities during the fiscal year for which the award is given. Selection criteria will include both objective and subjective data. Committee will consider employees and offices that demonstrate outstanding outreach on behalf of veterans who have barriers to employment, especially homeless, incarcerated, disabled, and recently separated veterans. The committee will consider individual or office-wide programs that promote employment opportunities for veterans within the local community or enhance provider awareness of veterans' issues and resources. Individual attitude, motivation, program improvement, positive feedback, and other indicators of outstanding performance will be given consideration in addition to numerical data.

For individual awards, emphasis will be placed on ensuring that all staff who serve veterans through the array of Department of Labor employment and training programs are considered for awards. States also will take extra care to recognize those individuals working in various specialized programs that serve certain target groups of veterans in each state.

Acceptable awards are defined broadly to accommodate the differences in state laws and union agreements.

**Eligibility:** For this year's award period, FY 2020, the eligible recipients of State Employee Performance Incentive Awards will be the following:

- Offices eligible to receive incentive awards include any service delivery point that provides exemplary public employment and training services to veterans; American Job Centers operated by State Workforce Agencies or offices that contract with State, Regional, or Local Workforce Development Boards; and other agencies identified in Section 121(b)(2)(B) of WIOA that provide services to veterans. Per Public Law 109-461 Sec. 603, incentive awards may be used by employment service office recipients

**Total of two (2) office Non-monetary awards.**

All expenditures for non-monetary awards will be managed by DWD Central Office.

- **Individual Awards:** Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment Representative (LVER) staff, and any other individual who provides employment, training, and placement services to veterans under the Workforce Innovation and Opportunity Act (WIOA), include labor exchanges funded by the Wagner Peyser Act or staff of American Job Center partner agencies. States are not

restricted from awarding individuals who collectively serve a specific function or work in an area where their performance warrants recognition under a state's incentive awards program. Volunteers, U.S. Department of Veterans Affairs Work Study participants, and Federal employees are not eligible recipients.

- **The Individual awards will be cash awards. The amount of the cash award will depend on the number of individuals selected and the amount of incentive dollars available each year.**

**Actions Required:**

1. Offices and individuals, in accordance with the eligibility rules listed above, can be nominated by anyone. See enclosures for information regarding nominations. Local LVERS are available to assist individuals and/or offices with the submissions of a nomination packet.
2. All nominations must be forwarded by email to **arrive no later than June 15th,** to the Director Office of Veterans Employment Services, 201 East Washington, Madison, WI. gary.meyer@dwd.wisconsin.gov. Late packets will be returned without action.
3. DWD-DET and/or JVSG Leadership will form a committee of three members to review and select individuals and offices from the nominations received, using the criteria listed in this announcement.
4. The JVSG Director will forward the final award selectees to the DWD Division of Employment and Training and the department for official approval, notification and announcement.

1. **Disbursement of Funds:** Cash awards received are considered income for tax purposes. Non-cash office awards recipients will be arranged by DWD Central office.

1. Cash Awards: Because it is a personal benefit to an individual, the law requires that the State of Wisconsin take out taxes on the receipt of a cash award. Taxes are currently at the 40% level. Example: if you receive a $1,500 award on your payroll check, finance will at that time then take taxes out of your payroll check for $600; you will receive a net award of $900.00. If donating funds to a non-profit organization, there are no taxes deducted from the amount that you designate for that organization. Because taxes are not deducted, the donation will be in "name only", not allowed for individual tax deduction purposes.
2. Office awards: Incentive awards may be used by offices for a variety of purposes. A suggested list of possible purchases is provided to offices selected. Approval by the Director of the Office of Veterans Services must be obtained before purchase. Purchases will be completed by administrative staff at GEF 1 following approval.
3. Individuals not accepting their award: If this situation arises, the committee members will then select the next best nomination from those nominations received and determined to be deserving of an award. If there are no other nominees selected for an award, then the remaining funds will be evenly disbursed to increase the amounts of the two office awards. Any funds planned to be donated to a non-profit organization will require prior approval and require that organization to complete and provide a W9 form.

E. THE POPULATIONS OF ELIGIBLE VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

Wisconsin JVSG Staff will provide services to veterans designated as SBEs and other in accordance with VPL 3-14 changes 1-2 and VPL 3-19. In addition, job center staff created procedures to refer populations to the DVOP. These populations include veterans with a service connected disability, veterans without a high school diploma, homeless or low-income eligible individuals (as defined by WIOA Section 3 (36),) 18-24 year old veterans possessing limited civilian work history which would make transition to the civilian workforce difficult, Viet Nam era veterans facing difficult times finding and maintaining employment, eligible transitioning members of the Armed Forces, spouses and caregivers who have been identified in need of individualized career services, transitioning members of the Armed Forces that are wounded, or injured and receiving treatment at military facilities, and spouses or family caregivers of wounded, ill or injured. DVOPs will conduct additional outreach activity with Native American tribal units and tribal service officers. DVOPS will provide individualized career services for eligible veterans that are released from incarceration DVOPs will provide individualized career services for veterans that are referred by the Department of Veterans Affairs Chapter 31 rehabilitation program.

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

Per GO Memo 1-20, This section is addressed in the WIOA common elements section

G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND AMERICAN JOB CENTER STAFF:

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

Per GO Memo 1-20 this section is not required in the JVSG portion of the plan

2. EMPLOYMENT PLACEMENT SERVICES, AND

Per GO Memo 1-20 this section a response in this section is not required

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

Per GO Memo 1-20 this section a response in this section is not required

H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

All newly hired LVER or DVOP staff complete on-line distance learning regarding veteran's benefits. This training is provided by (National Veterans' Training Institute) NVTI Training Solutions, a DOLVETs sponsored training provider. All FTE staff attend competency training provided by NVTI within 18 months of their hire date. Staff receive instructions on all data entry from DWD/OVES supervisors. Additional staff training is available to all DWD staff through the Cornerstone

Wisconsin will provide a statewide annual LVER and DVOP training conference if adequate funding to support this training is available as annual budgets are developed. The JSVG State Coordinator concur with, coordinate and inform the DVET if an annual LVER and DVOP training is not possible due to JVSG program expenditures or obligation.

Attached is a list of staff names, staff locations, and their competency training date. Wisconsin JVSG program sends all staff to available updated NVTI training for refresher training after obtaining approval from the DVET.

**LVER Michael James**

**Milwaukee Job Center Northeast**

**4201 N 27th Street Milwaukee, WI 53216**

**Start Date 4/26/15**

**NVTI Training Date 9/25/2015**

**LVER Brian Feltes**

**Pewaukee Workforce Development Center**

**892 Main Street, suite J Pewaukee, WI 53072**

**Start Date 05/18/2015**

**04/15/2016**

**LVER Jeff Murphy**

**1802 Appleton Rd. Menasha, WI 54952**

**Start Date 5/29/2017**

**NVTI Training Date 9/29/2017**

**LVER Derek Jablonicky**

**301 N Adams Street, Suite 130, Box 8, Green Bay, WI 54301**

**Start Date 6/17/2013**

**NVTI Training Date 12/12/2014**

**LVER John Henninger**

**Milwaukee Job Center Southeast**

**2701 S. Chase Milwaukee, WI 53207**

**Start Date 7/23/2018**

**NVTI Training Date 3/1/2019**

**LVER Tait Strand**

**Marathon Job Center**

**364 Grand Ave. Wausau, WI 54403**

**Start Date 8/6/2018**

**NVTI Training Date 5/24/2019**

**LVER Brian Peterson**

**Eau Claire Job Center**

**221 W. Madison St, Suite 140B, Eau Claire, WI 54703**

**Start Date 6/16/2014**

**NVTI Training Date 12/19/2014**

**LVER William Matteson**

**Rock County Job Center**

**1900 Center Rd Janesville, WI 53546**

**Start Date 03/09/2015**

**NVTI Training 9/09/2016**

**LVER Rickie Larson**

**La Crosse Job Center**

**2815 East Ave South, La Crosse, WI 54601**

**Start Date 3/14/2010**

**NVTI Training Date 7/23/2010**

**Consolidated Thomas Casey**

**Superior Job Center**

**1805 N. 14 Street, Suite 1 Superior, WI 54880**

**Start Date 06/21/2010**

**NVTI Training Date 03/25/2011**

**DVOP Hardy, Napoleon**

**Kenosha Job Center**

**8600 Sheridan Ave**

**Kenosha, WI 53143**

**Start Date 7/14/2014**

**NVTI Training Date 11/21/2014**

**DVOP Joshua Tamayo**

**Racine County Workforce Development Ctr.**

**1717 Taylor Street**

**Racine, WI 53403**

**Start Date 9/22/2014**

**NVTI Training Date 8/21/2015**

**DVOP Juan Torres**

**2701 S. Chase Milwaukee, WI 53207**

**Start Date 6/05/2000**

**NVTI Training Date 5/25/2001**

**DVOP Geraldine Perry Milwaukee Job Center Northeast**

**2201 N. 27th, Milwaukee, WI 53204**

**Start Date 10/25/2010**

**NVTI Training Date 4/29/2011**

**DVOP Corry Hunter**

**Milwaukee Job Center Northeast**

**2201 N. 27th, Milwaukee, WI 53204**

**Start date 8/08/2016**

**NVTI Training Date 12/01/2017**

**DVOP Robert Kinney**

**Milwaukee Job Center Southeast**

**2701 S. Chase Milwaukee, WI 53207**

**Start Date 9/03/2018**

**NVTI Training Date 5/10/2019**

**DVOP Chris Coleman**

**Workforce Development Center**

**Washington County 2200 Green Tree Road, West Bend, WI 53090**

**Start Date 12/10/2010**

**NVTI Training Date 9/2/2011**

**DVOP Nicholas Brewer**

**Fox Cities Workforce Development Center**

**1802 Appleton Rd. Menasha, WI 54952**

**Start Date 5/14/18**

**NVTI Training Date November 14, 2019**

**DVOP James Orlowski**

**Fox Cities Workforce Development Center**

**1802 Appleton Rd. Menasha, WI 54952**

**Start Date 8/6/2018**

**Training date 8/30/2018**

**DVOP Cynthia Holzman**

**Fond du Lac Area Job & Career Center**

**249 N. Peters Ave. Fond du Lac, WI 54935**

**Start Date 2/09/2015**

**NVTI Training Date 07/10/2015**

**DVOP Brian Marquardt**

**301 N Adams Street, Suite 130, Box 8, Green Bay, WI 54301**

**Start Date 12/01/2005**

**NVTI Training Date 6 /09/2006**

**DVOP Thomas Beverly**

**Brown County Job Center**

**301 N Adams Street, Suite 130, Box 8, Green Bay, WI 54301**

**Start Date 2/6/2015**

**NVTI Training Date 3/6/2015**

**Marathon Job Center**

**364 Grand Ave. Wausau, WI 54403**

**Start Date 5/18/2016**

**NVTI Training Date 7/18/2018**

**DVOP Michael Xiong**

**Eau Claire Job Center**

**221 W. Madison St, Suite 140B, Eau Claire, WI 54703**

**Start Date 5/29/2017**

**NVTI Training Date 4/20/2018**

**DVOP- Crystal Strand**

**La Crosse Center**

**2815 East Ave South, La Crosse, WI 54601**

**Start Date 8/20/2018**

**NVTI Training Date 7/26/2019**

**DVOP David Walters**

**Dane County Job Center**

**1819 Aberg Avenue Madison, WI 53704**

**Start Date 12/05/2016**

**NVTI Training Date 12/01/2017**

**Dane County Job Center**

**1819 Aberg Avenue Madison, WI 53704**

**Start Date 11/08/1999**

**NVTI Training Date August 24, 2001**

**DVOP Richard Forss**

**Dane County Job Center**

**1819 Aberg Avenue Madison, WI 53704**

**Start Date 9/08/2014**

**Last NVTI Training Date 3/18/2016-training delay due to family health issues**

**DVOP Andrew Phelps (ISC)**

**Central Office**

**201 E. Washington Ave. Madison, WI 53707**

**Training Start Date 3/18/2019**

**NVTI Training 7/26/2019**

**201 E. Washington Ave. Madison, WI 53707**

**Start Date 3/18/2019**

**NVTI Training – 7/26/2019**

**Jessica Maple (Supervisor)**

**Marathon Job Center**

**364 Grand Ave. Wausau, WI 54404**

**Start Date 3/10/2014**

**NVTI Training Date 8/19/2016**

**LVER Garcia, Alfonzo (Supervisor)**

**Kenosha Job Center**

**8600 Sheridan Ave**

**Kenosha, WI 53143**

**Start Date 6/16/2014**

**11/7/2014**

**Gary Meyer, (Director)**

**201 E. Washington Ave. Madison, WI 53707**

**Start Date as DVOP - 12/10/1984**

**NVTI Training held in Denver, CO - 02/1986**

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

No additional information required at this time.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

All WIOA Core Programs

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
|---|---|---|---|---|
| Effectiveness in Serving Employers | Not Applicable[1] | Not Applicable[1] | Not Applicable[1] | Not Applicable[1] |

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

OTHER APPENDICES

**The Operational Guide, Protocols & Checklist**

**to Develop the Annual Allocations for**

**Workforce Development Areas**

Prepared by: Gary Denis, November 2009

Bureau of Workforce Training

Revised: March 2010, May 2015, Oct. 2015, Oct 2016, Sept. 2017, Jan. 2018

Last Revised: Jan. 2020

It is the intention that this document, along with the Allocation Template, will help the reader understand how WIOA allocations are developed for Wisconsin Workforce Development Areas.

The document contains instructions for each step of the allocation process, protocols for allocation development and a checklist to ensure that each step is completed in a timely fashion. This guide will be the operating instruction for the staff members who will calculate the allocations.

It is also important to note that this document represents an ongoing work in progress. After each allocation cycle, the Division of Employment and Training (DET) will review the effort and improve the process, as necessary. This guide will be revised to reflect those process improvements.

The guide and the allocation process meet the Department of Labor requirements. The guide will also be revised to reflect changes to the allocation process that must be implemented in response to changes in federal requirements.

**References:**

WIOA Public Law 113-128, July 22, 2014, Sec. 128

WIOA Public Law 113-128, July 22, 2014, Sec. 133

**Introduction**

The workforce development activities carried out in Wisconsin's eleven Workforce Development Areas (WDAs) are federally funded through the Workforce Innovation and Opportunity Act (WIOA). WIOA funds are distributed to states based on three factors described in Sections 128 and 133 of the Act. Funds provided through this process are considered allotments, are announced through a Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) usually in March, and are provided for Youth, Adult, and Dislocated Worker programs.

Definitions used in the preparation of allocations:

Allocations Developer: The developer is a DWD staff person who is responsible for collecting data from various sources, inputting the data into the allocations spreadsheet, adjusting the spreadsheet and calculating the allocation shares and subsequent allocations.

Allocations Share: The percent of the funds that a WDA should expect to receive from the funds available for local distribution for that program in the State based on the funding formula or hold harmless provisions.

Allocations Team: A small group of workforce professionals from DWD and the WDBs will review the allocation methodology and allocation results prior to the release of the WIOA allocations for each program year.

ASU: Area of Substantial Unemployment – Number of unemployed persons residing in a county or reportable city that has at least one census tract or a combination of contiguous census tracts with a population of 10,000 and an unemployment rate of at least 6.451%. (Wisconsin uses 6.451% as directed by the Bureau of Labor Statistics)

Data Source Contacts: The key staff to communicate with at agencies that produce data used in the allocation formulae. (Attachment C contains a listing of contacts)

Declining Industries: Industry sectors (2-digit North American Industrial Classification System (NAICS) code.) that have fewer jobs than the sector had in a criterion year. For the current PY allocations, the number of jobs from the most recently available calendar year will be compared to the number of jobs in the PY from 5 years prior.

Economically disadvantaged adults: Individuals age 22-72 who meet (or member of family meets): OMB poverty level or 70% of Lower Living Standard Income Level (LLSIL), excluding college students and military as counted in the census. (Concentrated Employment Program areas have a special adjusted LLSIL).

Economically disadvantaged youth: Individuals age 16-21 who meet (or member of family meets) OMB poverty level or 70% of LLSIL, excluding college students and military as counted in the census. (Concentrated Employment Program areas have a special adjusted LLSIL).

Excess unemployed: The number of unemployed individuals above a 4.5% unemployment rate residing in a WDA.

Insured Unemployment: total number of UI Claimants for most recently completed calendar year.

Internal Review Team: A small group of DWD staff who will review the allocation spreadsheets, DOL allotment announcements and related policies to ensure that allocation shares calculation is correct prior to release to the Allocation Team for review and comment.

Long-term Unemployed: UI Claimants that received unemployment compensation for 15 or more weeks in the most recently completed calendar year.

Lower Living Standard Income Level (LLSIL): The LLSIL is defined as "that income level (adjusted for regional, metropolitan, urban and rural differences and family size) determined

annually by the Secretary [of Labor] based on the most recent lower living family budget issued by the Secretary.''

OMB Poverty Level: Following the Office of Management and Budget's (OMB's) Directive 14, the Census Bureau uses a set of money income thresholds that vary by family size and composition to detect who is in poverty. If a family's total income is less than that family's threshold, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation with the Consumer Price Index (CPI-U). The official poverty definition counts money income before taxes and excludes capital gains and noncash benefits (such as public housing, Medicaid, and food stamps).

Unemployment Concentrations: The WDA must meet or exceed the state unemployment rate or have 10% or more of all unemployed workers in the state in order to qualify for this factor. This data is from the prior program year (July to June).

Factors Used in the Calculating WIOA Allocations:

Once the allotment is received, Division of Employment and Training staff prepares the within state allocations.

Youth Formula [WIOA sec. 128:

For the youth programs, the same factors used to determine Federal allotments are used to distribute funds among the WDAs. The three factors are

1. 33 1/3% on the basis of the relative number of unemployed individuals in ASUs in each workforce investment area, compared to the total number of unemployed individuals in ASUs in the State;

2. 33 1/3% on the basis of the relative number of Excess Unemployed individuals in each workforce investment area, compared to the total number of Excess Unemployed individuals in the State; and

3. 33 1/3% on the basis of the relative number of disadvantaged youth in each workforce investment area, compared to the total number of disadvantaged youth in the State, as reported by the American Community Survey.

To reduce some of the volatility of the formula factors on WDAs, a hold harmless provision is applied to the results of the three-factor formula. The Act provides that a WDA shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the WDA for the 2 preceding fiscal years. See Attachment A for complete allocation instructions..

Adult Formula [WIOA sec. 133:

For the adult programs, the same factors used to determine Federal allotments are used to distribute funds among the WDAs. The three factors are

1. 33 1/3% on the basis of the relative number of unemployed individuals in ASUs in each workforce investment area, compared to the total number of unemployed individuals in ASUs in the State (based on the annual average ending June of the previous year after benchmarking);

2. 33 1/3% on the basis of the relative number of Excess Unemployed individuals in each workforce investment area, compared to the total number of Excess Unemployed individuals in the State (based on the annual average ending June of the previous year after benchmarking); and

3. 33 1/3% on the basis of the relative number of disadvantaged adults in each workforce investment area, compared to the total number of disadvantaged adults in the State, as reported by the American community Survey. [

To reduce some of the volatility of the formula factors on WDAs, a hold harmless provision is applied to the results of the three-factor formula. The Act provides that a WDA shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the WDA for the 2 preceding fiscal years. See Attachment B for complete allocation instructions.

Dislocated Worker (DW) Formula [WIOA sec. 133:

The Dislocated Worker within state allocation is calculated based on a formula developed by the Governor and approved in the State's WIOA Plan. There are six factors in the WI Dislocated Worker allocation formula. The factors and their associated weights are:

1. 25% based on a WDA's Unemployment Concentration value as a percentage of the entire state's Unemployment Concentration value.
2. 18.75% based on the relative number of Long Term Unemployed persons living in the WDA as compared to the number of Long Term Unemployed persons in the state.
3. 6.25% based on the relative number of persons living in the WDA who have established an Unemployment claim as compared to that number for the state.
4. 25% based on Declining Industries where the relative number of jobs lost by industry within the WDA is compared to the number of jobs lost by industry within the state.
5. 12.5% based on the relative number of persons reported as receiving notice of lay off in Plant Closing/Mass Layoff notices in the WDA compared to the total reported for the state.
6. 12.5% based on each WDA's prorated share of Farm Hardship as measured by farm closings.

To reduce some of the volatility of the formula factors on WDAs, a hold harmless provision is applied to the results of the formula. The Act provides that a WDA shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the WDA for the 2 preceding fiscal years.

Allocation Timetable is as shown in Attachment D.

Review Teams:

Internal Review Team: Whenever internal review is needed, the following positions will be consulted.

| | |
|---|---|
| Policy Initiatives Advisor or Bureau of Workforce Information and Technical Support Bureau Director | Governance/Compliance Section Chief<br><br>DET Budget Analyst assigned to WIOA<br><br>DET Contracting Staff |

Allocations Team: The Allocations Team consists of DWD and WDB staff who will review the process and results to ensure accuracy and compliance with the requirements that govern the development of WIOA allocations. Members include:

| | |
|---|---|
| Administrator, Div. of Employment and Training<br><br>Director, Bureau of Workforce Training<br><br>Local Services Section Chief | Policy Initiatives Advisor or Bureau of Workforce Information and Technical Support Director<br><br>Directors from two WDBs |

**<u>Calculating the Allocations</u>**

The allocation formula is embodied in a 16-tabbed MS-Excel spreadsheet. The spreadsheet has been modified over the years due to legislative changes..

Although the spreadsheet is usually referred to as the Allocation Formula, there are really two allocation formulas that are calculated in the spreadsheet; the Youth/Adult formula (aka the 3-part formula) and the Dislocated Worker formula, which has 6 parts. Both formulae use some common data so they are done together.

In the chart below is a list of the tabs within the spreadsheet. Each tab is classified by its primary purpose and the program it influences. A tab that is classified as a Calculator generally takes data that has been input in another location and processes it to produce a factor for the formula. An Input tab generally is a storage location for data that has been provided by a data source and will be used by a Calculator tab. In some instances, a tab will be both Calculator and Input. The Info/Print tabs contain information of interest or summarize results in a printable format.

| Tab Name: | Calculator | Info/Print | Input | Adult | Youth | DW |
|---|---|---|---|---|---|---|
| Reference | | | X | X | X | X |
| DOL Allotment | X | | X | X | X | X |
| Print Allocations | X | X | | X | X | X |
| Calc Adult | X | | | X | | |
| Calc Youth | X | | | | X | |
| Calc DW | X | | | | | X |
| 3-Part | X | | X | X | X | |
| DW 6-Part | X | | | | | X |
| WARN Data | | | X | | | X |
| UI Claimants | X | | X | | | X |
| UI Concentrations | X | | | | | X |
| Farm Loss | X | | X | | | X |
| Industry Decline | X | | | | | X |
| ASU-EU Calculator | X | | | X | X | X |
| ASU calculations | | | X | X | X | X |
| Updates | | X | X | X | X | X |

**Comments on the Table:**

**Column 2, 3, and 4 describe the purpose of the tab. Column 5,6, and 7 describe the program that tab applies to.**

**Specific Instruction for each Tab**

Reference TAB: This tab is a location to enter data that will be referenced throughout the workbook. For example, every year the Program Year must be changed manually on virtually every tab. By referencing a cell on this sheet, all the Program Years can be changed with one entry. Similar mass references are included in this tab.

DOL Allotment TAB: This tab calculates the gain/loss from the prior year; calculates the state admin, 15% discretionary fund, special response fund and funds for local distribution; and, provides a history of allotments received from DOL.

The allocation developer has a number of procedures to execute on this sheet. They are:

1. Copy the most current year allotment amounts from column D5-D12 to column C5-C12.
2. Enter new PY allotments from the DOL TEGL into the first free column to the right of the "History Section."
3. Copy the cell references from this new column in the History Section to D5-D12.
4. Enter the TEGL number and date as the information source in Cell B15 and at the end of the source list starting in A27.
5. The DOL Allotment Tab references the local distribution amounts in column K5-K7. Allocation shares multiplied by the local distribution amounts generates WDA allocations by program.

Print Allocations TAB: The Print Allocations tab calculates and displays each WDA's allocation shares, allocation amount, and its hold harmless status for each program. All the calculations on this tab are automatic. The allocation shares come from the Calc Adult, Calc Youth and Calc DW. Allocations are generated by multiplying the allocation share by the allotment available for local distribution from column K on the DOL Allotment Tab. The source notation comes from the DOL Allotment page as well and the Program Year comes from the Reference Tab.

The only manual task for the Allocations developer is to print the sheet.

CALC ADULT TAB: This tab applies the hold harmless provision to the Adult allocation shares calculated on the 3-part tab, maintains a history of prior allocation shares, and exports the allocation shares and the hold harmless designation to the Print Allocations Tab. The tab has three sections.

- Section 1 calculates whether a WDA will be held harmless and adjusts the allocation shares of those WDAs not held harmless down to make up for the hold harmless adjustment. This iterative process may cause some WDAs not initially held harmless to be protected as their share falls to provide the hold harmless to eligible WDAs. This section compares the allocation shares calculated on the 3-part tab to 90% of the Average of Prior 2 Years Share and chooses the higher of the two shares. If any WDA is held harmless, the sum of the shares will exceed 100%. Each subsequent column checks if each WDA share in the previous column exceeds the hold harmless share and if so, reduces the share in proportion to its contribution to exceeding 100% in the sum of the

prior column. This process progressively reduces the sum of the column closer to 100%. When the column sum reaches 100.0000%, or there have been 25 recalculations, whichever is later, recalculation can stop.

- Section 2 is a historical table of allocation shares by WDA from the inception of WIA. The shares from the most recent 2 years prior to the allocation year provide the data for the Average of Prior 2 Years Share in Column C in Section 1.

- Section 3 is used to double check the final adjustment against the 90% hold harmless amount and label the hold harmless WDAs. This section contains all of the exportable data from this sheet for the Print Allocations Tab.

Most of the calculations are automatic in this sheet though there are some maintenance functions that an Allocations developer must perform. They are:

1.

    a. In Section 2, ensure that the Allocation Shares for the most recent program year are actual values, not cell references. If they are cell references or formulas, copy the Allocation share column onto itself using Paste Special, Values and Formatting. This will convert the relative references to values.

1.

    a. Copy the two most recent Program Year's data from this Section to columns C & D of this Section. Section 1, column C uses this data to calculate the Average of the Prior 2 Years.

1.

    a. After the calculations have been run, copy column AE or appropriate column (see note below) from Section 1 to the appropriate PY blank column in section 2. Use the Paste Special, Values and Number Formatting when copying to ensure that the allocation shares are recorded as values rather than relative reference cells or formulas. Note: if the sum of column AE in Section 1 is greater than 100.0000%, copy the first column in Section 1 where the total equals 100.0000% to Section 2.

1.

    a. After copying to Section 2, enter a comment in the header of the column that tells which column was used from Section 1.

1.

    a. The Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used.

CALC YOUTH TAB: This tab applies the hold harmless provision to the Youth allocation shares calculated on the 3-part tab, maintains a history of prior allocation shares, and exports the allocation shares and the hold harmless designation to the Print Allocations Tab. The tab has three sections.

- Section 1 calculates whether a WDA will be held harmless and adjusts the allocation shares of those WDAs not held harmless down to make up for the hold harmless adjustment. This iterative process may cause some WDAs not initially held harmless to be protected as their share falls to provide the hold harmless to eligible WDAs. This section compares the allocation shares calculated on the 3-part tab to 90% of the Average of Prior 2 Years Share and chooses the higher of the two shares. If any WDA is held harmless, the sum of the shares will exceed 100%. Each subsequent column checks if each WDA share in the previous column exceeds the hold harmless share and if so, reduces the share in proportion to its contribution to exceeding 100% in the sum of the prior column. This process progressively reduces the sum of the column closer to 100%. When the column sum reaches 100.0000%, or there have been 25 recalculations, whichever is later, recalculation can stop.

- Section 2 is a historical table of allocation shares by WDA. (Carrie, the table goes back to 2000 so is the sentence correct? I do not know the history Or we could just delete.) The shares from the most recent 2 years prior to the allocation year provide the data for the Average of Prior 2 Years Share in Column C in Section 1.

- Section 3 is used to double check the final adjustment against the 90% hold harmless amount and label the hold harmless WDAs. This section contains all of the exportable data from this sheet for the Print Allocations Tab.

Most of the calculations are automatic in this sheet though there are some maintenance functions that an Allocations developer must perform. They are:

1. In Section 2, ensure that the Allocation Shares for the most recent program year are actual values, not cell references. If they are cell references or formulas, copy the Allocation share column onto itself using Paste Special, Values and Formatting. This will convert the relative references to values.

1. Copy the two most recent Program Year's data from this Section to columns C & D of this Section. Section 1, column C uses this data to calculate the Average of the Prior 2 Years.

1. After the calculations have been run, copy column AE or appropriate column (see note below)from Section 1 to the appropriate PY blank column in section 2. Use the Paste Special, Values and Number Formatting when copying to ensure that the allocation shares are recorded as values rather than relative reference cells or formulas. Note: if the sum of column AE in Section 1 is greater than 100.0000%, copy the first column where the total equals 100.0000% in Section 1 to Section 2.

1. After copying to Section 2, enter a comment in the header of the column that tells which column was used from Section 1.

1. The Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used.

CALC DW TAB: This tab applies the hold harmless provision to the Dislocation Worker allocation shares calculated on the DW 6-part tab, maintains a history of prior allocation shares, and exports the allocation shares and the hold harmless designation to the Print Allocations Tab. The tab has four sections.

- Section 1 calculates whether a WDA will be held harmless and adjusts the allocation shares of those WDAs not held harmless down to make up for the hold harmless adjustment. This iterative process may cause some WDAs not initially held harmless to be protected as their share falls to provide the hold harmless to eligible WDAs. This section compares the allocation shares calculated on the DW 6-part tab to 90% of the average of the Prior Two Year's Shares and chooses the higher of the two shares. If any WDA is held harmless, the sum of the shares will exceed 100%. Each subsequent column checks if each WDA share in the previous column exceeds the hold harmless share and if so, reduces the share in proportion to its contribution to exceeding 100% in the sum of the prior column. The following sentence should go here. This process progressively reduces the sum of the column closer to 100%. When the column sum reaches 100.0000%, or there have been 25 recalculations, whichever is later, recalculation can stop.

- Section 2 is a historical table of allocation shares by WDA. The shares from the most recent year prior to the allocation year provides the data for the Prior PY Shares in Column C in Section 1.

- Section 3 is used to double check the final adjustment against the 90% hold harmless amount and label the hold harmless WDAs. This section contains all of the exportable data from this sheet for the Print Allocations Tab.

Most of the calculations are automatic in this sheet though there are some maintenance functions that an Allocations developer must perform. They are:

1. In Section 2, ensure that the Allocation Shares for the most recent program year are actual values, not cell references. If they are cell references or formulas, copy the Allocation share column onto itself using Paste Special, Values and Number Formatting. This will convert the relative references or formulas to values.

1. Change the references in Section 1, column C to references the allocation shares from the most recent program year prior to the year allocations are being calculated for.

1. After the calculations have been run, copy column AE or appropriate column (see note below) from Section 1 to the appropriate PY blank column in section 2. Use the Paste Special, Values and Number Formatting when copying to ensure that the allocation shares are recorded as values rather than relative reference cells or formulas. Note: if the sum of column AE in Section 1 is greater than 100.0000%, copy the first column in Section 1 where the total equals 100.0000% to Section 2.

1. After copying to Section 2, enter a comment in the header of the column that tells which column was used from Section 1.

1. The Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used.

3-Part TAB: This tab is used to calculate allocation shares from the 3 factors in the WIOA legislation. The 3-part formula is set up to calculate a share that a WDA would receive of the State's allotment if based solely on the factors in the Act. Each factor is 1/3 of the share. The factors are the relative share the WDA's economically disadvantaged adults or youth makeup of the State's economically disadvantaged adults or youth, the relative share the WDA makes up of the State's unemployed in excess of 4.5% and the WDA's share of unemployed living in the State's ASUs (at least 6.451%). The results of this page are exported to Column E in Section 1 in the Calc Adult and the Calc Youth Tabs where they are compared to the hold harmless levels.

The Allocations developer has very little to do on this sheet. Everything is either calculated by formula from data brought into this tab from the ASU-EU Calculator Tab, data imported directly from the ASU-EU Calculator or data hard coded into columns I & J. The data in column I, “Adult Economic Disadvantaged,” & J, “Youth Economic Disadvantaged,” changes once every five years and must be updated by hand - based on instructions from the Department of Labor.

DW 6-Part TAB: This sheet is used to aggregate the six dislocated worker factors together to generate an allocation share based on economic factors only. Each of the columns represent results from other tabs and their weighting factor. For each WDA, Column C is the sum of each factor value multiplied by its weighting in the 6-Part formula. The current weighting numbers in

row 20 are informational. The values in Column C are exported to Tab Calc DW, Column E for use in adjusting the allocation shares by hold harmless.

Most of the work on this tab is managed by the spreadsheet itself. The Allocations developer only has to update the date of the Unemployment and WARN Data, the headers on farm loss data and the reference years in the declining industry's header.

The data for this tab comes from a variety of other tabs. The data from those other tabs are brought to this tab to calculate the DW allocation share before the hold harmless provision is applied.

- The Total Paid UC comes from column D of the UI Claimant Tab.
- The % Total UC comes from column C of the UI Claimant Tab.
- The data for the 15 or More Weeks comes from column F of the UI Claimant Tab.
- The % UC Long is imported from column E of the UI Claimant Tab.
- The Number Affected in WARN Notices comes from column E of the WARN Data Tab.
- Percent of Total Affected by WARN Notice is accessed from column F of the WARN Data Tab.
- % of UE with threshold comes from column C of the UI Concentrations Tab.
- WDAs where Unemployed concentrations are a factor is imported from the UI Concentrations Tab, column D.
- # of Farm Losses is from the Farm Loss Tab, column E. Farm Loss is updated every five years.
- % of Farm Loss is gathered from column F of the Farm Loss Tab.
- Employment Decline is copied in from the Industry Decline Tab, column I. The % Decline comes from column J of that same tab.
- Unemployed (LAUS) is copied from the ASU-EU Calculator Tab, column E. The percent of unemployed is based on the unemployed numbers in column Q of the DW-6-Part Tab.

WARN Data TAB: This tab gathers data that addresses the DOL formula requirement to account for Plant Closing-Mass Layoff. WDAs areas receive a prorated share of the total number of persons reported as being laid off from their employment by employers who file a Notice under state & federal plant closing - mass layoff laws. The Dislocated Worker Unit of the BWT supplies this data. The Allocations Developer copies in this data by WDA from the electronic report provided by the DW Unit to the next available column in the Historic Information section.

The numbers affected by WARN notices for the most recent calendar year are entered in the appropriate calendar year columns. The percent shares are calculated automatically in column to the right. This data automatically exports to the DW 6-Part Tab, columns H & I.

UI Claimant TAB: The purpose of this tab is to calculate the relative share each WDA will receive of the state's long-term unemployed and the number of UI Claimants for the Dislocated Worker calculation. The data is provided by the Unemployment Insurance Division.

The report is UI Report: DWDUIBNP.UI9618.TSOLIB.WIAUIDUR, Table of SDA by WKPD.

- The number of claimants must be entered from the report into cells D7 to D17. Column C calculates the WDA shares of the state total.
- The number of UI recipients that have received payments for more than 15 weeks is entered for each WDA in cells F7 through F17. Column E calculates the WDA shares.

The tab exports Columns C, D, E and F automatically to the DW 6-Part Tab for use in calculating the DW allocation share.

UI Concentrations TAB: The purpose of this tab is to determine whether a WDA qualifies as having a concentration of unemployed. The tab calculated the state's average unemployment rate for the prior calendar year, and then calculates the value of 10% of the state's average unemployment for the prior calendar year. If a WDA's unemployment rate (as calculated in column G) exceeds the state rate or if the WDA number of unemployed (column H) exceeds 10% of the state's total unemployment, the WDA qualifies to compete for shares of this factor. The WDAs that qualify receive a relative share based on their share of the total unemployment of the qualifying WDAs.

The data used here comes from the file used for the within state allocation that has been submitted to the DOL in accord with instructions in Training and Employment Guidance Letter and BLS LAUS Technical Memorandum . This file is used by the DOL to determine allotments to states.

The Allocations Developer has nothing to manipulate on this page. All data used to determine this factor comes from other tabs or is the result of within tab calculations. No input required. The tab will export cells C8 through D19 to DW 6-Part cells J7 to K18. This factor makes up 25% of the DW allocation share.

The box that is marked informational in this tab illustrates how each WDA qualifies for the factor. Some WDAs qualify by having more than 10% of the state's total unemployment, some

because their rate is higher than the state's unemployment rate, and in some cases because they meet both. A WDA does not qualify a larger share by meeting both benchmarks.

Farm Loss TAB: This tab calculates each WDA's share of farm hardship experienced in the state. We measure Farm hardship by comparing the number of farms in operation in a reference year compared to the average number of farms in operation in the previous Census of Agriculture. Reference year data is updated every 5 years via the Census of Agriculture – County Data. (E.g. the 2017 census became available in 2019 and is used for PY2019 calculations.) The Allocations Developer will need to hard code in the number of farms by county in column D and update the headers to refer to the actual years used in the calculation of farm loss if necessary. Once the data is entered, the tab will calculate the loss by county and WDA and export the number of farm losses and the WDA share of farm loss to the DW 6-Part tab, columns L & M respectively.

Industry Decline TAB: This tab computes the declining industry factor by calculating job losses in declining industry. This tab has two sections. Section A summarizes the employment in declining industry and calculates the WDA's relative share of the state's declining industry employment.

Section B provides the raw data by two-digit NAICS and is supplied by QCEW Staff. The most recently available calendar year data is compared to average industry employment data from the calendar year 5 years earlier. (E.g. CY2017 data is compared to CY2012.) Wherever there is job loss from the reference year to the most recent year, that industry loss is added to the WDA total losses in declining industries.

Because some employers do not provide location information, there are employment numbers not assigned to a county. The unassigned employment is distributed to each WDA based on the distribution of employment with known locations.

Section A

- Column E3 – E13 is total distributed employment by WDA gathered from Section B, column H42 – H1,576.
- Column F3 – F13 calculates the share of total distributed employment attributable to each WDA.
- Column G3 – G13 calculates the share of the unassigned job loss (column I19 - 39 in section B) that should be distributed to each WDA by multiplying the total unassigned job losses (cell I40) by the WDA share of distributed employment (column F3-13).
- Column H3 – H13 sums the distributed employment loss in declining industries by WDA from Section B, column I42 – I1,576.

- Column I3 – I13 totals each WDA's employment declines by adding columns G & H in Section A together. This brings unassigned job loss and distributed employment loss together for calculating the WDA share of employment loss in declining industries.
- Column J is the WDA share calculated by dividing the WDA's total employment in declining industry listed in column I by the State's employment in declining industry (cell I14)
- Data in columns I & J move to the DW 6-Part tab in columns N & O.
- Distributed employment in Section B, column G & H is distributed by 2-digit NAICS by county and aggregated to WDA.

Section B

All of the data for Section B is copied in from a WisConomy data pull and QCEW EXPO data pull for suppressed data. When copying to any of the columns in Section B, the copy must be done by WDA and a summation of the WDA's data done at the end of their data.

- Column I19 – I1,576: This column calculates the number of job losses that have occurred by subtracting industry employment for the most recent year (column H19 – H1,576) from the industry employment in the reference year (column G19 – G1,576). If jobs have been lost in the comparison, the number lost will show. If there are job gains or no loss, the cell will appear blank.

There is more cut and paste work on this tab than on any other in the workbook. In addition to the care that must be taken getting the data into this tab, care must also be taken to update column headers to represent the correct year for data comparisons.

ASU-EU Calculator TAB: This tab is used to take ASU data (Column O from ASU calculations tab ) and LAUS data (Column N from ASU calculations tab) to calculate the WDA Share of the State's ASU and Excess Unemployment totals. The Allocations Developers role on this tab is checking and validating as all actions are done automatically. The list of counties and their sub parts need to be checked against the list of counties and parts of counties on the ASU calculations tab to ensure exact matches in the 2 lists.

Here is how this tab works.

- Column G calculates the ASU Unemployment Rate for each geographic area listed in column A by dividing column C data by the sum of column C & D. The resultant ASU unemployment rate is checked by column I to discern if the rate that is at least 6.451%. If it does, the total number of ASU unemployed in the WDA (Column C) is entered into the I column in the summed row for each WDA. If the ASU unemployment rate that is less than 6.451%, a zero is entered into sum row of the I column. This value is then divided by the state total ASU unemployment to report the WDA share of ASU unemployment in the cell below the sum row for each WDA
- Column H calculates the LAUS unemployment rate for each geographic area listed in column A by dividing the LAUS unemployment in column E by the sum of column E &

F. Column J calculates the number of unemployed equivalent to 4.5% of the labor force and subtracts that number from the number of LAUS unemployed in column E. If this value exceeds zero it is entered into column J, otherwise zero is entered. This value is LAUS Excess Unemployment.

- Column K calculates ASU Excess Unemployment. Column K calculates the number of unemployed equivalent to 4.5% of the labor force and subtracts that number from the number of ASU unemployed in column C. If this value exceeds zero it is entered into column K, otherwise zero is entered. This value is ASU Excess Unemployment.
- Column L compares LAUS Excess Unemployment (column J) to ASU Excess Unemployment (column K) and puts the greater value in column L.
- Columns E & F data in the "sum" row for each WDA is exported to the UI Concentrations tab columns H & I respectively and are used to calculate an unemployment rate; which should match the LAUS unemployment rate in the "sum" row of column H on this tab.
- Columns I & L data in the "sum" row are exported to the 3-Part tab, columns K & L respectively. There this data is used to calculate the WDA share of Excess unemployment (column E) and share of Substantial unemployment (column F). The shares calculated here should equal the shares in the row just below the "sum" line for each WDA on this tab.
- All cells are locked on this tab. The only time data entry is required is if there is a mismatch on the list of geographic areas.

ASU Calculations TAB: The Local Area Unemployment Statistics (LAUS) program manager conducts the ASU exercise every year for the US Department of Labor using county level unemployment data from the LAUS program and the most recent American Community Survey 5-year estimates from the US Census Bureau. In order for an area to qualify as an ASU, the total unemployment has to be at least 6.451% , the population has to be at least 10,000 and all components of the ASU area have to be contiguous. An ASU can be a county, city, or combination of areas, such as census tracts or counties.

In order to develop a qualifying ASU, the 12-month average of the LAUS data for the most recent period ending in June is calculated for each county and city (population 25,000+) in the state. July-Dec of the prior year uses LAUS benchmarked data; data for the current year Jan-May uses revised data and June uses preliminary data. Data from the Census is available for the counties and cities and is broken down by census tract within each of those areas. If a single county or city does not have a 12-month average unemployment rate of at least 6.451% , surrounding counties or cities can be added (or subtracted) until the contiguous area reaches a rate of at least 6.451% . Individual census tracts within the counties or cities are examined in an attempt to include those tracts with the highest number of unemployed persons. All areas that are included in the ASU have to be contiguous and the total population of the included areas must be at least 10,000 (based on Census).

Since monthly LAUS data is not available at the census tract level, the census tracts in a given county that are being included in the ASU area are multiplied by the total LAUS unemployment

and employment (12-month average) for that county. This ratio is called the Census-Share (and is column O in the WIASU spreadsheet; the 12-month LAUS average is column N.)

Once as many areas of the state as possible have been exhausted into ASUs and the data has been submitted and approved by the US Department of Labor, the ASU designations and the corresponding data are used internally in the WIA/DW allocation process.

The file used for the within state allocation is submitted to the DOL in accord with instructions in Training and Employment Guidance Letter and BLS LAUS Technical Memorandum . This file is used by the DOL to determine allotments to states.

The Allocations Developer copies "Column N" and "Column O" into the LAUS Tab taking care to match data to geographic areas.

Updates TAB: This Tab will be used to document changes to the workbook whenever changes are performed.

Attachments:

Attachment A: WIOA Sec 128 Youth Within State Allocations

Attachment B: WIOA Sec 133 Adult and Dislocated Worker Within State Allocations

Attachment C: Data Source Matrix

Attachment D: Allocation Checklist

ATTACHMENT A

WORKFORCE INNOVATION and OPPORTUNITY ACT

Public Law 113-128--July 22, 2014 128 Stat. 1425

SEC. 128. WITHIN STATE ALLOCATIONS.

(a) RESERVATIONS FOR STATEWIDE ACTIVITIES.—

(1) IN GENERAL.—The Governor shall reserve not more than 15 percent of each of the amounts allotted to the State under section 127(b)(1)(C) and paragraphs (1)(B) and (2)(B) of section 132(b) for a fiscal year for statewide workforce investment activities.

(2) USE OF FUNDS.—Regardless of whether the reserved amounts were allotted under section 127(b)(1)(C), or under paragraph (1)(B) or (2)(B) of section 132(b), the Governor may use the reserved amounts to carry out statewide activities under section 129(b) or statewide employment and training activities, for adults or dislocated workers, under section 134(a).

(b) WITHIN STATE ALLOCATIONS.—

(1) METHODS.—The Governor, acting in accordance with the State plan, and after consulting with chief elected officials and local boards in the local areas, shall allocate the funds that are allotted to the State for youth activities and statewide workforce investment activities under section 127(b)(1)(C) and are not reserved under subsection (a), in accordance with paragraph (2) or (3).

(2) FORMULA ALLOCATION.—

(A) YOUTH ACTIVITIES.—

(i) ALLOCATION.—In allocating the funds described in paragraph (1) to local areas, a State may allocate—

(I) 331/3 percent of the funds on the basis described in section 127(b)(1)(C)(ii)(I);

(II) 331/3 percent of the funds on the basis described in section 127(b)(1)(C)(ii)(II); and

(III) 331/3 percent of the funds on the basis described in clauses (ii)(III) and (iii) of section 127(b)(1)(C).

(ii) MINIMUM PERCENTAGE.—The local area shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years. Amounts necessary for increasing such allocations to local areas to comply with the preceding sentence shall be obtained by ratably reducing the allocations to be made to other local areas under this subparagraph.

(iii) DEFINITION.—In this subparagraph, the term ‘‘allocation percentage’’, used with respect to fiscal year 2015 or a subsequent fiscal year, means a percentage

of the funds referred to in clause (i), received through
an allocation made under this subparagraph, for the
fiscal year. The term, used with respect to fiscal year
2013 or 2014, means a percentage of the funds referred
to in section 128(b)(1) of the Workforce Investment
Act of 1998 (as in effect on the day before the date
of enactment of this Act), received through an allocation
made under paragraph (2) or (3) of section 128(b)
of the Workforce Investment Act of 1998 (as so in
effect), for the fiscal year 2013 or 2014, respectively.
(B) APPLICATION.—For purposes of carrying out
subparagraph (A)—
(i) references in section 127(b) to a State shall
be deemed to be references to a local area;
(ii) references in section 127(b) to all States shall
be deemed to be references to all local areas in the
State involved; and
(iii) except as described in clause (i), references
in section 127(b)(1) to the term ‘‘excess number’’ shall
be considered to be references to the term as defined
in section 127(b)(2).
(3) YOUTH DISCRETIONARY ALLOCATION.—In lieu of making
the allocation described in paragraph (2), in allocating the
funds described in paragraph (1) to local areas, a State may
distribute—
(A) a portion equal to not less than 70 percent of
the funds in accordance with paragraph (2)(A); and
(B) the remaining portion of the funds on the basis
of a formula that—
(i) incorporates additional factors (other than the
factors described in paragraph (2)(A)) relating to—
(I) excess youth poverty in urban, rural, and

suburban local areas; and

(II) excess unemployment above the State average in urban, rural, and suburban local areas; and

(ii) was developed by the State board and approved by the Secretary as part of the State plan.

(4) LOCAL ADMINISTRATIVE COST LIMIT.—

(A) IN GENERAL.—Of the amount allocated to a local area under this subsection and section 133(b) for a fiscal year, not more than 10 percent of the amount may be used by the local board involved for the administrative costs of carrying out local workforce investment activities under this chapter or chapter 3.

(B) USE OF FUNDS.—Funds made available for administrative costs under subparagraph (A) may be used for the administrative costs of any of the local workforce investment activities described in this chapter or chapter 3, regardless of whether the funds were allocated under this subsection or section 133(b).

(c) REALLOCATION AMONG LOCAL AREAS.—

Consultation.

(1) IN GENERAL.—The Governor may, in accordance with this subsection and after consultation with the State board, reallocate to eligible local areas within the State amounts that are made available to local areas from allocations made under this section or a corresponding provision of the Workforce Investment Act of 1998 for youth workforce investment activities (referred to individually in this subsection as a ''local allocation'') and that are available for reallocation.

(2) AMOUNT.—The amount available for reallocation for

a program year is equal to the amount by which the unobligated balance of the local allocation, at the end of the program year prior to the program year for which the determination under this paragraph is made, exceeds 20 percent of such allocation for the prior program year.

(3) REALLOCATION.—In making reallocations to eligible local areas of amounts available pursuant to paragraph (2) for a program year, the Governor shall allocate to each eligible local area within the State an amount based on the relative amount of the local allocation for the program year for which the determination is made, as compared to the total amount of the local allocations for all eligible local areas in the State for such program year.

(4) ELIGIBILITY.—For purposes of this subsection, an eligible local area means a local area that does not have an amount available for reallocation under paragraph (2) for the program year for which the determination under paragraph (2) is made.

ATTACHMENT B

WORKFORCE INNOVATION and OPPORTUNITY ACT

Public Law 113-128--July 22, 2014 128 Stat.1425

SEC. 133. WITHIN STATE ALLOCATIONS.

(a) RESERVATIONS FOR STATE ACTIVITIES.—

(1) STATEWIDE WORKFORCE INVESTMENT ACTIVITIES.—The Governor shall make the reservation required under section 128(a).

(2) STATEWIDE RAPID RESPONSE ACTIVITIES.—The Governor shall reserve not more than 25 percent of the total amount

allotted to the State under section 132(b)(2)(B) for a fiscal year for statewide rapid response activities described in section 134(a)(2)(A).

(b) WITHIN STATE ALLOCATION.—

(1) METHODS.—The Governor, acting in accordance with the State plan, and after consulting with chief elected officials and local boards in the local areas, shall allocate—

(A) the funds that are allotted to the State for adult employment and training activities and statewide workforce investment activities under section 132(b)(1)(B) and are not reserved under subsection (a)(1), in accordance with paragraph (2) or (3); and

(B) the funds that are allotted to the State for dislocated worker employment and training activities and statewide workforce investment activities under section 132(b)(2)(B) and are not reserved under paragraph (1) or (2) of subsection (a), in accordance with paragraph (2).

(2) FORMULA ALLOCATIONS.—

(A) ADULT EMPLOYMENT AND TRAINING ACTIVITIES.—

(i) ALLOCATION.—In allocating the funds described in paragraph (1)(A) to local areas, a State may allocate—

(I) 331/3 percent of the funds on the basis described in section 132(b)(1)(B)(ii)(I);

(II) 331/3 percent of the funds on the basis described in section 132(b)(1)(B)(ii)(II); and

(III) 331/3 percent of the funds on the basis described in clauses (ii)(III) and (iii) of section 132(b)(1)(B).

(ii) MINIMUM PERCENTAGE.—The local area shall not receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal

years. Amounts necessary for increasing such allocations to local areas to comply with the preceding sentence shall be obtained by ratably reducing the allocations to be made to other local areas under this subparagraph.

(iii) DEFINITION.—In this subparagraph, the term ''allocation percentage'', used with respect to fiscal year 2015 or a subsequent fiscal year, means a percentage of the funds referred to in clause (i), received through an allocation made under this subparagraph, for the fiscal year. The term, used with respect to fiscal year 2013 or 2014, means a percentage of the amount allocated to local areas under paragraphs (2)(A) and (3) of section 133(b) of the Workforce Investment Act of 1998 (as in effect on the day before the date of enactment of this Act), received through an allocation made under paragraph (2)(A) or (3) of that section for fiscal year 2013 or 2014, respectively.

(B) DISLOCATED WORKER EMPLOYMENT AND TRAINING ACTIVITIES.—

(i) ALLOCATION.—In allocating the funds described in paragraph (1)(B) to local areas, a State shall allocate the funds based on an allocation formula prescribed by the Governor of the State. Such formula may be amended by the Governor not more than once for each program year. Such formula shall utilize the most appropriate information available to the Governor to distribute amounts to address the State's worker readjustment assistance needs.

(ii) INFORMATION.—The information described in clause (i) shall include insured unemployment data, unemployment concentrations, plant closing and mass

layoff data, declining industries data, farmer-rancher economic hardship data, and long-term unemployment data.

(iii) MINIMUM PERCENTAGE.—The local area shall not receive an allocation percentage for fiscal year 2016 or a subsequent fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years. Amounts necessary for increasing such allocations to local areas to comply with the preceding sentence shall be obtained by ratably reducing the allocations to be made to other local areas under this subparagraph.

(iv) DEFINITION.—In this subparagraph, the term ''allocation percentage'', used with respect to fiscal year 2015 or a subsequent fiscal year, means a percentage of the funds referred to in clause (i), received through an allocation made under this subparagraph for the fiscal year. The term, used with respect to fiscal year 2014, means a percentage of the amount allocated to local areas under section 133(b)(2)(B) of the Workforce Investment Act of 1998 (as in effect on the day before the date of enactment of this Act), received through an allocation made under that section for fiscal year 2014.

(C) APPLICATION.—For purposes of carrying out subparagraph (A)—

(i) references in section 132(b) to a State shall be deemed to be references to a local area;

(ii) references in section 132(b) to all States shall be deemed to be references to all local areas in the State involved; and

(iii) except as described in clause (i), references
in section 132(b)(1) to the term ''excess number'' shall
be considered to be references to the term as defined
in section 132(b)(1).
(3) ADULT EMPLOYMENT AND TRAINING DISCRETIONARY
ALLOCATIONS.—In lieu of making the allocation described in
paragraph (2)(A), in allocating the funds described in paragraph
(1)(A) to local areas, a State may distribute—
(A) a portion equal to not less than 70 percent of
the funds in accordance with paragraph (2)(A); and
(B) the remaining portion of the funds on the basis
of a formula that—
(i) incorporates additional factors (other than the
factors described in paragraph (2)(A)) relating to—
(I) excess poverty in urban, rural, and suburban
local areas; and
(II) excess unemployment above the State
average in urban, rural, and suburban local areas;
and
(ii) was developed by the State board and approved
by the Secretary as part of the State plan.
(4) TRANSFER AUTHORITY.—A local board may transfer, if
such a transfer is approved by the Governor, up to and
including 100 percent of the funds allocated to the local area
under paragraph (2)(A) or (3), and up to and including 100
percent of the funds allocated to the local area under paragraph
(2)(B), for a fiscal year between—
(A) adult employment and training activities; and
(B) dislocated worker employment and training activities.
(5) ALLOCATION.—
(A) IN GENERAL.—The Governor shall allocate the funds
described in paragraph (1) to local areas under paragraphs

(2) and (3) for the purpose of providing a single system
of employment and training activities for adults and dislocated
workers in accordance with subsections (c) and
(d) of section 134.
(B) ADDITIONAL REQUIREMENTS.—
(i) ADULTS.—Funds allocated under paragraph
(2)(A) or (3) shall be used by a local area to contribute
to the costs of the one-stop delivery system described
in section 121(e) as determined under section 121(h)
and to pay for employment and training activities provided
to adults in the local area, consistent with section 134.
(ii) DISLOCATED WORKERS.—Funds allocated under
paragraph (2)(B) shall be used by a local area to contribute
to the costs of the one-stop delivery system
described in section 121(e) as determined under section
121(h) and to pay for employment and training activities
provided to dislocated workers in the local area,
consistent with section 134.
(c) REALLOCATION AMONG LOCAL AREAS.—
(1) IN GENERAL.—The Governor may, in accordance with Consultation.
this subsection and after consultation with the State board,
reallocate to eligible local areas within the State amounts that
are made available to local areas from allocations made under
paragraph (2)(A) or (3) of subsection (b) or a corresponding
provision of the Workforce Investment Act of 1998 for adult
employment and training activities, or under subsection
(b)(2)(B) or a corresponding provision of the Workforce Investment
Act of 1998 for dislocated worker employment and
training activities (referred to individually in this subsection
as a ''local allocation'') and that are available for reallocation.
(2) AMOUNT.—The amount available for reallocation for
a program year—

(A) for adult employment and training activities is equal to the amount by which the unobligated balance of the local allocation under paragraph (2)(A) or (3) of subsection (b) for such activities, at the end of the program year prior to the program year for which the determination under this subparagraph is made, exceeds 20 percent of such allocation for the prior program year; and

(B) for dislocated worker employment and training activities is equal to the amount by which the unobligated balance of the local allocation under subsection (b)(2)(B) for such activities, at the end of the program year prior to the program year for which the determination under this subparagraph is made, exceeds 20 percent of such allocation for the prior program year.

(3) REALLOCATION.—In making reallocations to eligible local areas of amounts available pursuant to paragraph (2) for a program year, the Governor shall allocate to each eligible local area within the State—

(A) with respect to such available amounts that were allocated under paragraph (2)(A) or (3) of subsection (b), an amount based on the relative amount of the local allocation under paragraph (2)(A) or (3) of subsection (b), as appropriate, for the program year for which the determination is made, as compared to the total amount of the local allocations under paragraph (2)(A) or (3) of subsection (b), as appropriate, for all eligible local areas in the State for such program year; and

(B) with respect to such available amounts that were allocated under subsection (b)(2)(B), an amount based on the relative amount of the local allocation under subsection (b)(2)(B) for the program year for which the determination is made, as compared to the total amount of the local

allocations under subsection (b)(2)(B) for all eligible local areas in the State for such program year.

(4) ELIGIBILITY.—For purposes of this subsection, an eligible local area means—

(A) with respect to funds allocated through a local allocation for adult employment and training activities, a local area that does not have an amount of such funds available for reallocation under paragraph (2) for the program year for which the determination under paragraph (2) is made; and

(B) with respect to funds allocated through a local allocation for dislocated worker employment and training activities, a local area that does not have an amount of such funds available for reallocation under paragraph (2) for the program year for which the determination under paragraph (2) is made.

ATTACHMENT C: DATA SOURCES FOR THE WIOA ALLOCATIONS

| Data Required to Calculate Allocations | Contact Name | Source |
|---|---|---|
| • Relative share of the Excess Unemployment by WDA<br><br>• Relative share of the unemployed in ASUs by WDA | Heather Thompson<br><br>(608) 267-5053 | An electronic file is provided by LAUS Research Analyst for the most recent program year after validation by BLS (ARRA used calendar year and was not validated until after allocations were required to be out.)<br><br>The file is submitted to the DOL in accord with instructions in Training and Employment Guidance Letter and BLS LAUS Technical Memorandum . This file is used by the DOL to determine allotments to states. |

| Data Required to Calculate Allocations | Contact Name | Source |
|---|---|---|
| • WDA concentrations of unemployed | | |
| • Relative share of the Economically Disadvantaged Adults by WDA<br><br>• Relative share of the Economically Disadvantaged Youth by WDA | Dennis Winters<br><br>(608) 267-3262 | Poverty and Lower Living Standard Income Level (LLSIL) Data is provided by the Department of Labor ETA. Source file is included in the allocation folder |
| Prorated share of the total loss in the number of farms per the most current data available. | NASS Website | Data on the number of farms on the most current Census of Agriculture is available on the http://www.nass.usda.gov/Data_and_Statistics/index.asp. The US Dept of Agriculture, National Agricultural Statistical Service, maintains this data. Data is captured from Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: |
| • WDA share of unemployment recipients<br><br>• WDA share of long term | Janet Sausen<br><br>(608) 267-9807 | This data is received via a PDF file from UID and is available in late January. The data is for the prior calendar year and generated as report DWDUIBNP-UI9618.TSOLIB.WIAUIDUR. Data is provided on Table of SDA by WKPD. Data could be provided as a TXT file. |

| Data Required to Calculate Allocations | Contact Name | Source |
|---|---|---|
| unemployed in state | | |
| WDA share of laid off individuals as reported through WARN | Gesina Mentink<br><br>(608) 264-9821 | The Dislocated Worker Unit provides this data annually. The report is known as Table 2c |
| WDA share of employment in declining industries | Sarah Hoffman<br><br>(608) 267-2424 | QCEW Unit provides this data file in mid-January. Data compares most recent year to a criterion year. Whoever is doing the allocations specifies the criterion year. The comparison years are included in the request for a report file to BITS. |

ATTACHMENT D: ANNUAL ALLOCATIONS DEVELOPMENT CHECKLIST

| Number | Task Required | Responsible Person | Target Date | |
|---|---|---|---|---|
| 1 | BWT and BWITS leadership meet to prepare for the project. | BWT Director | Jan 4th | |
| 2 | Request data from data sources identified in "Attachment C" of the Allocation Guide. | BWITS Director | Jan 5th | |
| 3 | Data is received by the Allocations Developer. | BWITS Director | Jan. 25th | |
| 4 | Data is validated against specifications. | BWITS Director | Feb 1st | |
| 5 | *Internal Review Team (IRT) informed by email of the date that the Allocation Share review process starts. | BWITS Director | Feb 5th | |
| 6 | Allocation Template reviewed to ensure that historic data is moved to storage and reference data is up to date. | BWITS Director | Feb 5th | |
| 7 | BWITS staff meet with leadership to assess progress and resolve data issues. | BWITS Director | Feb 5th | |
| 8 | Summary of Allocation project progress sent to AO. | BWT Director | Feb 8th | |
| 9 | Data is entered into tabs in Allocation Template and Template renamed Allocations PYXX and is sent to the IRT for review. | BWITS Director | Feb 10th | |

| Number | Task Required | Responsible Person | Target Date | |
|---|---|---|---|---|
| 10 | Internal Review Team completes review and provides feedback to the Allocations Developer. | IRT Members | Feb 17th | |
| 11 | Complete adjustments to the spreadsheet and allocation shares based on the IRT review. | BWITS Director | Feb 18th | |
| 12 | Send PYXX Allocation Shares Spreadsheet & Allocations Guide to the **Allocations Team for review. | BWT Director | Feb 22nd | |
| 13 | Meet with the Allocations Team to review/discuss the PYXX Allocation Shares development/process. | BWITS Director | Feb 26th | |
| 14 | Complete revisions to allocations shares that come from the Allocations Team review. | BWITS Director | Mar 8th | |
| 15 | Prepare the Admin Memo to transmit Allocation Shares to the workforce system for review and comment. | BWT Director | Mar 8th | |
| 16 | Send Admin Memo with Allocation Shares to Workforce System. | Administrator's Office | Mar 10th | |
| 17 | Comments received from Workforce System. | BWT Director | Mar 19th | |
| 18 | Reconvene the Allocations Team to review comments received by the 19th. | BWT Director | Mar 23rd | |
| 19 | Finalize the Allocation Shares. | BWITS Director | Mar 26th | |
| 20 | Receive TEGL announcing state allotments. | BWT Director | | |
| 21 | IRT reviews TEGL to determine if there are policy issues that affects the allocation process and spreadsheets are adjusted as required. | BWITS Director | Within 10 days of receipt | |
| 22 | Calculate the Allocations & prepare the Admin Memo to transmit final allocation shares and allocation amounts. | BWITS and BWT Directors | 15 days after TEGL | |
| 23 | Issue Admin Memo to the Workforce Development Board Directors and other interested parties. | Administrator's Office | 20 days post TEGL | |
| 24 | Funds released to WDBs upon receipt of the Notice of Obligation (NOO) from the U.S. Department of Labor | BWT Director | Within 30 days of receipt | |

*Note: The IRT is defined on Page 5 of this document.

**Note: The Allocations Team is defined on Page 6 of this document.