

Wisconsin PY2024 – 2027 WIOA COMBINED STATE PLAN

DRAFT

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I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. UNIFIED OR COMBINED STATE PLAN

This is a combined state plan.

Combined State Plan Partner Programs

Indicate which Combined State Plan partner program(s) the State is electing to include:

- 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

Wisconsin's economy has been on a winning streak. During 2023, the state experienced a record high number of jobs, record low unemployment, and seasonal, historic lows for initial weekly and continuing unemployment insurance claims. For November, U.S. Bureau of Labor Statistics (BLS) data showed an increase in the state's labor force participation rate to 65.9%, a full three percentage points above the national rate. Successful collaboration among employers, government, educational institutions, and workers throughout the state also contributed to record high disability employment, with 178,337 working age individuals with disabilities employed. Meanwhile, participation in Registered Apprenticeship reached a record high of 16,384 apprentices with more than 2,600 participating employers during 2023. Youth Apprenticeship also reached a record high of 8,357 participants and 5,719 employers.

While these numbers reflect the state's economic success, many employers are finding it difficult to fill jobs. The reality is Wisconsin, like the rest of the country and even the world, is facing a labor market quantity challenge driven by demographic trends that have been building for decades. Baby boomers are aging and retiring, birth rates have declined, and there has been net zero to negative in-migration to Wisconsin over most of the last decade. These trends are unlikely to change in the foreseeable future. Additionally, there are Wisconsinites who continue to face barriers to employment, including but not limited to child care, housing, and transportation.

What sets Wisconsin apart in addressing these challenges is Gov. Tony Evers' historic investment of more than \$158 million in American Rescue Plan Act (ARPA) funds for innovative workforce solutions. Implementation of Evers' initiatives along with ongoing programs is yielding success by removing employment barriers; connecting employers with underutilized talent pools; expanding access to in-demand training; and promoting workforce participation.

The use of federal ARPA funds offered new flexibility and allowed the state to accelerate progress in addressing workforce challenges. Applying the lessons learned from these investments to Workforce Innovation and Opportunity Act funding has prompted a bold new effort by the U.S. Department of Labor known as "Yes, WIOA Can!" The following PY2024 – 2027 WIOA Combined State Plan makes the most of this opportunity to maximize the potential of Wisconsin's workforce development system and advance the competitiveness of workers, employers, and job seekers.

In addition to the requirements of WIOA addressed in this plan, the state of Wisconsin and the Governor's Council on Workforce Investment are committed to developing innovative strategies and promoting data-driven, evidence-based policies to connect Wisconsin's workforce to high-quality jobs and develop skills to meet the state's ever-changing workforce and economic development landscape. Initiatives that are already underway to position Wisconsin for the workforce of the next generation include:

- Exploring opportunities to further strengthen education and workforce development services by taking full advantage of the historic investments made possible through the Bipartisan Infrastructure Law (BIL), the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA).
- The Governor's Task Force on Workforce and Artificial Intelligence. The task force is charged with creation of an advisory action plan that recommends policy directions and investments related to workforce development and educational systems to capitalize on the AI transformation.
- Participating in the U.S. DOL's Job Quality Academy to create systems that will increase access to career building opportunities through diversity, equity, inclusion, and accessibility efforts for the child care and healthcare industries.

II. STRATEGIC ELEMENTS

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

1. ECONOMIC AND WORKFORCE ANALYSIS

Economic Analysis

Wisconsin's economy continues to grow following the recovery from the COVID-19 pandemic. The total number of nonfarm jobs in the state hit an all-time high of 3,020,300 in November 2023, with previous new state record highs four months in a row from June through September 2023. Construction employment reached a record high of 136,000 jobs in September 2023. A record low seasonally adjusted unemployment rate of 2.4% and record lows in initial and continued weekly unemployment insurance claims were also achieved in 2023.

While Wisconsin's latest (November 2023) labor force participation rate of 65.9% remains more than three percentage points above the national average, demographic trends, including the aging and retirement of the Baby Boomers generation are driving a labor quantity challenge.

As demand for workers remains robust, employers face challenges in attracting and retaining talent across all industries and skill sets. In addition to baby boomers leaving the labor force, underlying factors

contributing to this challenge include lower birth rates for generations, net zero to negative migration into the state over the past decade, and the continued presence of employment barriers.

Existing Demand Industry Sectors and Occupations

Though not a complete census of openings in the state, figures from the Job Center of Wisconsin (JCW) show opportunities in all major occupational groups (October 2023).

To address these challenges and long-term trends, Wisconsin's workforce development strategy is focused on removing workforce barriers; connecting employers with underutilized labor pools; delivering in-demand training; and promoting workforce participation. In-demand occupations include heavy and tractor-trailer truck drivers, registered nurses, educators, retail salespersons, food preparation and serving workers, nursing assistants, software developers, and assemblers and fabricators, among many others. The knowledge, skills, and abilities and credentials required for these occupations vary widely.

Wisconsin long-term employment projections (Figure 1) show that Leisure and Hospitality; Education and Health Services; and Trade, Transportation, and Utilities are expected to add the most jobs from 2020 through 2030. Because the base year of the projection is 2020, much of the increase for industries most affected by COVID-19 reflects recovery.

Wisconsin research analysts and economists at the Department of Workforce Development publish a list of "hot jobs" on the State of Wisconsin's labor market information portal, WisConomy.com. Hot jobs are positions in occupations that pay above the state median wage, are projected to add jobs faster than average and have the most projected openings. Many hot job occupations cross several industries. The construction, manufacturing, healthcare, and IT industries contain some of the top hot job clusters in the state.

Figure 1: Wisconsin Long-Term Industry Employment Projections, 2020-2030

Industry	2020 Employment (¹)	2030 Projected Employment	Employment Change (2020 - 2030)	Percent Change (2020 - 2030)
Total All Industries	3,040,197	3,231,419	191,222	6.29
Goods Producing	631,818	666,875	35,057	5.55
Natural Resources and Mining	49,737	51,573	1,836	3.69
Construction	123,837	133,129	9,292	7.50
Manufacturing	458,244	482,173	23,929	5.22
Services Providing	2,240,135	2,398,052	157,917	7.05
Trade, Transportation, and Utilities	533,222	560,145	26,923	5.05
Information	44,830	46,710	1,880	4.19
Financial Activities	152,900	156,232	3,332	2.18
Professional and Business Services	309,439	328,463	19,024	6.15
Education and Health Services	654,744	697,547	42,803	6.54
Leisure and Hospitality	231,224	283,992	52,768	22.82

Other Services (except Government)	147,558	154,250	6,692	4.54
Government	166,218	170,713	4,495	2.70
Self Employed and Unpaid Family Workers, All Jobs	168,244	166,492	-1,752	-1.04
(1) Employment is a count of jobs rather than people and includes all part- and full-time jobs. Employment also includes jobs among self-employed. Source: Office of Economic Advisors, Wisconsin Department of Workforce Development, Wisconsin Employment Projections 2020 – 2030				

Emerging Demand Industry Sectors

Emerging demand industry sectors and occupations generally are more difficult to address because of the lack of established classification; however, the state anticipates demand in certain categories based on demographic changes, recent technological trends, and large-scale, targeted investments by the federal government.

For example, individuals with the IT skills to improve existing technologies that support remote work and virtual events and services are likely to remain in high demand. The worker quantity challenge along with the pandemic's impact on in-person establishments, such as grocery stores and restaurants, has increased demand for greater automation and further implementation of self-checkout stations, automated floor cleaners, and voice and facial recognition technologies that can take orders and assign tables. It is uncertain whether this automation acceleration is simply a matter of short-term necessity or if it will continue unabated, in response to the current and future labor market conditions and consumer demands.

Beyond automation, ChatGPT and other tools have showcased the power of generative artificial intelligence (AI). AI developers are and will continue to be in high demand. Because of its potential to transform the state's future workforce, Governor Evers created the Governor's Task Force on Workforce and Artificial Intelligence in August 2023. This task force is gathering and analyzing information and will produce an advisory action plan to identify the current state of generative AI's impact on Wisconsin's labor market and develop informed predictions regarding its implications for the near term and future. The action plan will also identify how these workforce impacts may affect Wisconsin's key industries, occupations, and foundational skillsets and opportunities for the development and expansion of industry sectors and occupations yet to be realized.

Likewise, the Infrastructure Investment and Jobs Act, signed into law in November 2021, is "...the largest investment in clean energy infrastructure in American history."¹ The Brookings report, *Advancing Inclusion Through Clean Energy Jobs*, defines three clean energy economy sectors: clean energy production, energy efficiency, and environmental management. Occupations identified within the three sectors not only include those generally identified with clean energy (e.g., solar photovoltaic installers and wind turbine service technicians) but also occupations such as carpenters, plumbers, and HVAC professionals who will be instrumental in the transition to a cleaner energy economy. As noted above, while construction, trade, transportation, and utilities are already in demand, the incredible range of opportunities becoming available through the federal investments will likely spur even greater demand for these cross-industry occupations to support clean energy infrastructure in new and innovative ways.

¹ <https://www.whitehouse.gov/build/guidebook/>

Similarly, the opportunities available through Wisconsin's growing biotechnology sector are 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, and carbon footprint assessment, among others.

Employers' Employment Needs

The key labor market trend in Wisconsin is about workforce quantity and, as such, employers' fundamental need is finding enough workers to fill jobs across all regions and all current and emerging industry sectors and occupations. As baby boomers continue to leave the workforce, the state must engage every available potential worker in the labor force and train them to their fullest potential to meet employers' needs. See *'Workforce constraints limit growth'* discussion below.

Employers typically report that they look to hire workers with 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. Employability skills include those personal work habits and attitudes, such as showing up on time, daily attendance, safety, and discretion in managing resources and time. WIOA investments play a critical role in all three areas by removing workforce barriers, building in-demand skills, and supporting employability by aligning the expectations of employers and job seekers.

Beyond these skills that are considered requirements across all industry sectors and occupations, more specifically Long-Term Occupational Employment Projections (Figure 2) show specific employment needs in healthcare and IT systems. The need for additional workers is also expected in occupational groups requiring less formal education or training, including Personal Care and Service and Food Preparation and Serving (Figure 3).

Figure 2: Wisconsin Long Term Occupational Employment Projections, 2020-2030

SOC Code	Occupation Title	Employment 2020(1)	Projected Employment 2030	Numeric Change	Percent Change	Annual Exits (2)	Annual Transfers (3)	Annual Growth	Wages (5)			
									Annual Total Openings (4)	Annual 25 th Percentile	Annual Median	Annual 75 th Percentile
00-0000	Total, All Occupations	3,040,197	3,231,419	191,222	6.29	134,154	207,559	19,122	360,835	\$28,990.00	\$41,150.00	\$62,330.00
11-0000	Management Occupations	155,943	165,297	9,354	6.00	4,747	8,196	935	13,878	\$78,300.00	\$107,060.00	\$143,950.00
13-0000	Business and Financial Operations Occupations	183,672	192,924	9,252	5.04	5,008	11,146	925	17,079	\$49,440.00	\$64,020.00	\$83,370.00
15-0000	Computer and Mathematical Occupations	91,571	99,753	8,182	8.94	1,987	4,705	818	7,510	\$58,460.00	\$78,040.00	\$101,520.00

17-0000	Architecture and Engineering Occupations	53,554	58,653	5,099	9.52	1,299	2,630	510	4,439	\$57,970.00	\$73,280.00	\$92,110.00
19-0000	Life, Physical, and Social Science Occupations	25,366	27,772	2,406	9.49	556	1,879	241	2,676	\$46,460.00	\$62,750.00	\$83,380.00
21-0000	Community and Social Service Occupations	40,511	44,300	3,789	9.35	1,391	2,749	379	4,519	\$36,670.00	\$47,170.00	\$59,120.00
23-0000	Legal Occupations	16,590	17,516	926	5.58	471	670	93	1,234	\$50,590.00	\$70,370.00	\$ 117,620.00
25-0000	Education, Training, and Library Occupations	182,702	192,256	9,554	5.23	7,869	8,701	955	17,525	\$33,780.00	\$48,450.00	\$65,730.00
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	42,760	45,786	3,026	7.08	1,618	2,847	303	4,768	\$30,450.00	\$44,850.00	\$61,530.00
29-0000	Healthcare Practitioners and Technical Occupations	183,660	196,072	12,412	6.76	4,764	5,676	1,241	11,681	\$52,220.00	\$69,610.00	\$91,670.00
31-0000	Healthcare Support Occupations	144,320	162,566	18,246	12.64	9,161	9,302	1,825	20,288	\$24,650.00	\$29,340.00	\$35,380.00
33-0000	Protective Service Occupations	52,111	55,189	3,078	5.91	2,828	3,534	308	6,670	\$ 30,920.00	\$43,880.00	\$62,480.00
35-0000	Food Preparation and Serving Related Occupations	205,999	243,822	37,823	18.36	16,765	23,169	3,782	43,716	\$ 18,780.00	\$22,410.00	\$28,260.00
37-0000	Building and Grounds Cleaning and Maintenance Occupations	89,236	96,830	7,594	8.51	5,286	6,778	759	12,823	\$23,740.00	\$29,250.00	\$37,160.00
39-0000	Personal Care and Service Occupations	78,034	89,942	11,908	15.26	5,071	6,692	1,191	12,954	\$20,600.00	\$26,620.00	\$36,440.00
41-0000	Sales and Related Occupations	270,025	276,561	6,536	2.42	14,107	21,554	654	36,315	\$23,310.00	\$31,590.00	\$54,160.00
43-0000	Office and Administrative Support Occupations	371,446	356,224	-15,222	-4.10	17,480	22,898	-1,522	38,856	\$31,350.00	\$38,520.00	\$48,710.00
45-0000	Farming, Fishing, and Forestry Occupations	31,128	31,291	163	0.52	1,321	3,527	16	4,864	\$27,710.00	\$34,380.00	\$43,090.00
47-0000	Construction and Extraction Occupations	126,068	136,095	10,027	7.95	3,889	8,813	1,003	13,705	\$40,240.00	\$53,760.00	\$70,950.00
49-0000	Installation, Maintenance, and Repair Occupations	117,423	126,282	8,859	7.54	3,883	7,613	886	12,382	\$37,580.00	\$48,880.00	\$62,430.00
51-0000	Production Occupations	319,263	328,547	9,284	2.91	11,995	23,085	928	36,008	\$31,500.00	\$39,030.00	\$49,540.00
53-0000	Transportation and Material Moving Occupations	258,815	287,741	28,926	11.18	12,659	21,394	2,893	36,946	\$27,110.00	\$35,940.00	\$47,110.00

- (1) **Employment** count of jobs rather than people and includes all part- and full-time 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) **Wage** estimates from the Occupational Employment Statistics (OES) survey – May 2020

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

The top 50 projected fastest growing occupations by percent change are listed in Figure 3 below, which includes typical education for entry and related occupation work. Because the base year of the projection is 2020, much of the increase for occupations most affected by COVID-19 reflects recovery.

Figure 3: Wisconsin Long Term Occupational Employment Projections with Typical Education for Entry, 2020-2030

Rank	SOC Code	Occupation Title	Employment 2020(2)	Projected Employment 2030	Numeric Change	Percent Change	Annual Exits (3)	Annual Transfers (4)	Annual Growth	Annual Total Openings (5)	Typical education needed for entry (6)	Related-occupation work experience (7)	Post-hire training needed for competency (8)
1	39-3031	Ushers, Lobby Attendants, and Ticket Takers	1,736	2,792	1,056	60.83	287	230	106	623	No formal educational credential	None	Short-term on-the-job training
2	35-2014	Cooks, Restaurant	17,022	25,364	8,342	49.01	1,247	1,814	834	3,895	No formal educational credential	Less than 5 years	Moderate-term on-the-job training
3	29-1171	Nurse Practitioners	5,093	6,987	1,894	37.19	126	189	189	504	Master's degree	None	None
4	27-2042	Musicians and Singers	765	1,043	278	36.34	53	51	28	132	No formal educational credential	None	Long-term on-the-job training
5	13-1081	Logisticians	4,426	5,866	1,440	32.54	108	334	144	586	Bachelor's degree	None	None
6	51-9162	Computer Numerically Controlled Tool Programmers	1,164	1,536	372	31.96	46	100	37	183	Postsecondary non-degree award	None	Moderate-term on-the-job training
7	15-2041	Statisticians	642	845	203	31.62	15	37	20	72	Master's degree	None	None
8	27-2011	Actors	494	646	152	30.77	24	38	15	77	Some college, no degree	None	Long-term on-the-job training
9	27-4011	Audio and Video Equipment Technicians	568	742	174	30.63	17	48	17	82	Postsecondary non-degree award	None	Short-term on-the-job training
10	27-2021	Athletes and Sports Competitors	276	357	81	29.35	18	26	8	52	No formal educational credential	None	Long-term on-the-job training
11	39-9031	Fitness Trainers and Aerobics Instructors	10,345	13,315	2,970	28.71	693	1,123	297	2,113	High school diploma or equivalent	None	Short-term on-the-job training
12	39-6011	Baggage Porters and Bellhops	200	257	57	28.50	12	18	6	36	High school diploma or equivalent	None	Short-term on-the-job training

13	39-3093	Locker Room, Coatroom, and Dressing Room Attendants	225	288	63	28.00	25	29	6	60	High school diploma or equivalent	None	Short-term on-the-job training
14	27-1012	Craft Artists	111	142	31	27.93	6	7	3	16	No formal educational credential	None	Long-term on-the-job training
15	39-3091	Amusement and Recreation Attendants	3,199	4,051	852	26.63	354	406	85	845	No formal educational credential	None	Short-term on-the-job training
16	35-9011	Dining Room and Cafeteria Attendants and Bartender Helpers	4,490	5,684	1,194	26.59	439	440	119	998	No formal educational credential	None	Short-term on-the-job training
17	51-9195	Molders, Shapers, and Casters, Except Metal and Plastic	1,204	1,520	316	26.25	49	89	32	170	High school diploma or equivalent	None	Long-term on-the-job training
18	15-2098	Data Scientists and Mathematical Science Occupations, All Other	790	996	206	26.08	18	45	21	84	Bachelor's degree	None	None
19	19-1042	Medical Scientists, Except Epidemiologists	1,602	2,013	411	25.66	24	104	41	169	Doctoral or professional degree	None	None
20	49-9041	Industrial Machinery Mechanics	12,417	15,582	3,165	25.49	430	756	316	1,502	High school diploma or equivalent	None	Long-term on-the-job training
21	35-9031	Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	6,485	8,089	1,604	24.73	864	820	160	1,844	No formal educational credential	None	Short-term on-the-job training
22	49-3092	Recreational Vehicle Service Technicians	267	333	66	24.72	9	25	7	41	High school diploma or equivalent	None	Long-term on-the-job training
23	11-9111	Medical and Health Services Managers	5,627	6,999	1,372	24.38	158	321	137	616	Bachelor's degree	Less than 5 years	None
24	39-3011	Gaming Dealers	756	937	181	23.94	46	76	18	140	High school diploma or equivalent	None	Short-term on-the-job training
25	47-5051	Rock Splitters, Quarry	135	167	32	23.70	5	13	3	21	No formal educational credential	None	Short-term on-the-job training
26	35-3011	Bartenders	22,391	27,671	5,280	23.58	1,134	3,033	528	4,695	No formal educational credential	None	Short-term on-the-job training
27	31-2011	Occupational Therapy Assistants	1,046	1,292	246	23.52	58	86	25	169	Associate's degree	None	None
28	39-2011	Animal Trainers	927	1,145	218	23.52	48	75	22	145	High school diploma or equivalent	None	Moderate-term on-the-job training
29	35-1011	Chefs and Head Cooks	1,905	2,352	447	23.46	64	209	45	318	High school diploma or equivalent	5 years or more	None
30	27-2041	Music Directors and Composers	155	191	36	23.23	10	10	4	24	Bachelor's degree	Less than 5 years	None

31	39-1013	First-Line Supervisors of Gambling Services Workers	152	187	35	23.03	6	12	4	22	High school diploma or equivalent	Less than 5 years	None
32	27-2023	Umpires, Referees, and Other Sports Officials	924	1,133	209	22.62	58	83	21	162	High school diploma or equivalent	None	Moderate-term on-the-job training
33	53-3058	Passenger Vehicle Drivers, Except Bus Drivers, Transit and Intercity	15,570	19,091	3,521	22.61	1,141	862	352	2,355	No formal educational credential	None	Short-term on-the-job training
34	33-9031	Gaming Surveillance Officers and Gaming Investigators	121	148	27	22.31	7	10	3	20	High school diploma or equivalent	Less than 5 years	Moderate-term on-the-job training
35	15-2011	Actuaries	645	787	142	22.02	11	28	14	53	Bachelor's degree	None	Long-term on-the-job training
36	15-2031	Operations Research Analysts	2,086	2,539	453	21.72	50	101	45	196	Bachelor's degree	None	None
37	31-9011	Massage Therapists	2,649	3,223	574	21.67	172	153	57	382	Postsecondary non-degree award	None	None
38	27-2022	Coaches and Scouts	5,787	7,034	1,247	21.55	364	516	125	1,005	Bachelor's degree	None	None
39	27-3091	Interpreters and Translators	1,414	1,716	302	21.36	61	85	30	176	Bachelor's degree	None	None
40	27-2090	Miscellaneous Entertainers and Performers, Sports and Related Workers	443	535	92	20.77	19	27	9	55	No formal educational credential	None	Short-term on-the-job training
41	39-2021	Nonfarm Animal Caretakers	8,663	10,448	1,785	20.60	613	793	178	1,584	High school diploma or equivalent	None	Short-term on-the-job training
42	49-9011	Mechanical Door Repairers	433	521	88	20.32	11	27	9	47	High school diploma or equivalent	None	Moderate-term on-the-job training
43	29-1071	Physician Assistants	2,723	3,269	546	20.05	47	118	55	220	Master's degree	None	None
44	35-1012	First-Line Supervisors of Food Preparation and Serving Workers	15,577	18,676	3,099	19.89	764	1,745	310	2,819	High school diploma or equivalent	Less than 5 years	None
45	31-2021	Physical Therapist Assistants	1,606	1,924	318	19.80	76	133	32	241	Associate's degree	None	None
46	39-5092	Manicurists and Pedicurists	2,352	2,814	462	19.64	131	137	46	314	Postsecondary non-degree award	None	None
47	33-9092	Lifeguards, Ski Patrol, and Other Recreational Protective Service Workers	6,542	7,804	1,262	19.29	988	796	126	1,910	No formal educational credential	None	Short-term on-the-job training
48	35-3031	Waiters and Waitresses	29,625	35,324	5,699	19.24	2,384	3,878	570	6,832	No formal educational credential	None	Short-term on-the-job training

49	29-1126	Respiratory Therapists	2,292	2,727	435	18.98	54	63	44	161	Associate's degree	None	None
50	41-2012	Gaming Change Persons and Booth Cashiers	313	372	59	18.85	29	33	6	68	No formal educational credential	None	Short-term on-the-job training

(1) **Employment** count of jobs rather than people and includes all part- and full-time 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.

*To be considered, an occupation needed a minimum of 100 employment in the base year (2020).
Source: Office of Economic Advisors, Wisconsin Department of Workforce Development*

Workforce Analysis

As demonstrated below, Wisconsin's workforce participation reflects the state's strong economy. The latest numbers show a record-high number of jobs, record low unemployment, and seasonal, historic lows for initial weekly and continuing unemployment insurance claims. Meanwhile, the state's labor force participation rate has increased to 65.9%, a full three percentage points above the national rate.

While employment levels have grown and include those with disabilities and other employment barriers, employers continue to face challenges in attracting and retaining workers. Like the rest of the country and even the world, Wisconsin is facing a labor market quantity challenge driven by demographic trends that have been building for decades. Baby boomers are aging and retiring, birth rates have declined, and there has been net zero to negative in-migration to Wisconsin over most of the last decade. Too many Wisconsinites continue to face barriers to employment, including but not limited to child care, housing, and transportation, which also affects their labor force participation.

Strengthening the workforce requires continued targeted initiatives to remove employment barriers, connect employers with underutilized talent pools, expand access to in-demand training, and promote workforce participation.

Individuals with Barriers

WIOA identifies specific populations that may experience barriers to employment. Wisconsin recognizes that many of its residents struggle to obtain and maintain employment.

Figure 4: WIOA Identified Barriers to Employment – WI Individuals

WIOA Identified Barriers to Employment			
Population/Barrier	WIOA Ref.	Individuals in WI	Source
Low-Income Individuals (Defined by having income below the federal poverty level)	WIOA Sec. 3(24)(B)	617,037	2022 American Community Survey, Table S1701
American Indians or Alaska Natives (WIOA uses the definition of "Indian" from Section 4 of the Indian Self-	WIOA Sec. 3(24)(C)	44,394	2022 American Community Survey, Table DP05

Determination and Education Assistance Act (25 U.S.C. 450b)			
Native Hawaiians or Other Pacific Islanders (WIOA uses the definition of "Indian" from Section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450b))	WIOA Sec. 3(24)(C)	2,732	2022 American Community Survey, Table DP05
Individuals with Disabilities – Youth (Civilian non-institutionalized population under the age of 18)	WIOA Sec. 3(24)(D) WIOA Sec. 3(25)	52,464	2022 American Community Survey, Table S1810
Individuals with Disabilities – Adult (Civilian non-institutionalized population age 18 - 64)	WIOA Sec. 3(24)(D) WIOA Sec. 3(25)	364,947	2022 American Community Survey, Table C18120
Older Individuals (Individuals who are age 55 or older)	WIOA Sec. 3(24)(E) WIOA Sec. 3(39)	1,160,300	2022 Current Population Survey
Homeless Individuals	WIOA Sec. 3(24)(G)	On the average night, there are 4,775 homeless individuals, with 39.6% a part of families	State of Homelessness: 2023 Edition
Youth who are in or have aged out of foster care (As of Dec. 31, 2021)	WIOA Sec. 3(24)(H)	1,473 youth 14 years of age and older were in out-of-home care	Wisconsin Department of Children and Families
English Language Learners (Individuals in the state who speak English less than "very well")	WIOA Sec. 3(24)(I) WIOA Sec. 3(21) WIOA Sec. 203(7)	176,328	2022 American Community Survey, Table S1601
Migrant and Seasonal Farmworkers (includes dependents)	WIOA Sec. 3(24)(J) WIOA Sec. 167(i)(2) WIOA Sec. 167(i)(3)	6,935	Wisconsin Department of Workforce Development
Individuals within two years of exhausting lifetime eligibility for Temporary Assistance for Needy Families (aka TANF)	WIOA Sec. 3(24)(K)	Wisconsin averaged 24,224 Temporary Assistance for Needy Families (TANF) participants (during calendar year 2022)	Wisconsin Department of Children and Families
Long-Term Unemployed Individuals (those who have been unemployed for 27 consecutive weeks or more)	WIOA Sec. 3(24)(L)	15,300 (annual average 2022 data)	2022 Current Population Survey
Refugees (Individuals the Refugee Services Program	WIOA Sec. 3(24)(N)	1,381	Wisconsin Department of

served in Employment and Training Activities, FFY 2021 and 2022)			Children and Families
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Characteristics of Those Not in the Labor Force

According to the Current Population Survey, in 2022 (annual average), 1.68 million or 35.5% of the Wisconsin civilian, non-institutionalized population aged 16 and over did not participate in the labor market. The large majority of this population (95.6%) indicated that they did not want a job, though barriers may exist that, if addressed, could decrease the "not want a job" share.

Those not participating in the labor force includes 194,200 residents between the ages of 16 and 24 (many of whom are full-time students), 329,400 residents between the ages of 25 and 54, and 1,160,300 residents aged 55 and over. Thus, nearly 70% of the non-participating total are aged 55 and over.

Status of Labor Force Subgroups

There are several 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, individuals that are justice involved, and individuals that are low-income.

Individuals with Disabilities: There are 726,125 individuals in the civilian, non-institutionalized population in Wisconsin that self-identify as having a significant disability, according to the 2022 American Community Survey. Slightly over half of these individuals (364,947) are of working age, generally defined as between the ages of 18 and 64. This constitutes 10.4% of the state's total working age population. Of this number, 178,337 individuals are employed and an additional 11,785 reported being unemployed (and actively seeking work). This results in a 6.2% unemployment rate within this group – a rate that is over double the overall age 18-64 unemployment rate over the same period. That leaves 174,825 individuals with a disability unattached to the labor force. The most common disabilities for those not in the labor force are cognitive (94,235); ambulatory (92,583); and those that lead to independent living difficulties (88,513). Note that respondents can identify more than one disability. These figures result in a 52.1% labor force participation rate for the disabled population, significantly lower than Wisconsin's rate of 81.7% for the 18 to 64 age group overall.

Veterans: Wisconsin's veteran population is a recognized priority in the provision of workforce development services to support their participation in the labor force. According to 2022 American Community Survey data, there are a total of 283,767 military veterans in Wisconsin. Over 90% of veterans in the Wisconsin are White, three percent are Black, two percent are Hispanic, and other races make up the remaining percent. Males account for 92%, while females account for 8%. Thirty-seven percent of veterans are between the ages of 35 and 64.

There are 124,626 veterans of working age (between 18 and 64) in Wisconsin, representing another vital potential workforce resource. The unemployment rate of the state's age 18 to 64 veteran population is lower than that of the overall population (2.2% compared to 2.8% - 2022 American Community Survey), though the labor force participation rate is 0.5 percentage points lower. Among veterans aged 18-64, 16.1% experience some type of disability, which is considerably higher than the rate for the age 18-64 population overall (10.4%).

Incarcerated Population: A third notable group that may need additional assistance to participate in the labor force in Wisconsin is its incarcerated population. As of July 31, 2023, the Wisconsin Department of Corrections (DOC) has nearly 21,500 Persons in Care. Ninety-four percent of this population is male. Sixty-four percent of this population currently has less than five years of prison time remaining. Seventy-six percent of the male population and 66% of the female population have their highest level of education at the high school level or below.

Low-Income Individuals: Another group that is underrepresented in the labor force but provides a strong opportunity for participation are those individuals in Wisconsin who are between the ages of 18 and 64 living in poverty. In 2022, 358,199 people (10.3%) in Wisconsin in this age group lived in poverty, compared to 428,177 (12.3%) in 2010. Despite the improvement, this means there are still many 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 plan are needed to give the individuals in these groups the training and support required to allow them to productively enter and remain in the state's labor force pipeline. The state added the Departments of Children and Families (DCF), Health Services (DHS), and Corrections (DOC) as Combined State Plan partners in PY20-23 to increase the opportunity for economic mobility and work participation among these populations by promoting further collaboration among workforce, re-entry, and human service programs. These partner agencies remain in the PY24-27 WIOA State Plan.

Figure 5: Civilians not in the labor force by sex and age, January 2022-December 2022 (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	1683.9	194.2	329.4	1160.3	710.2	973.7
Do not want a job now	1610.0	173.2	294.6	1142.2	677.9	932.1
Want a job	73.9	21.0	34.7	18.2	32.3	41.6
Did not search for work in previous year	44.8	13.2	17.5	14.1	18.3	26.5
Searched for work in previous year	29.1	7.8	17.2	4.1	14.0	15.1
Not available to work now	10.1	2.7	6.3	1.1	3.9	6.2
Available to work now	19.0	5.1	10.9	3.0	10.1	9.0
Reason not currently looking:						
Discouragement over job prospects	6.2	2.5	2.6	1.2	3.7	2.5
Reasons other than discouragement	12.8	2.7	8.3	1.8	6.3	6.5

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

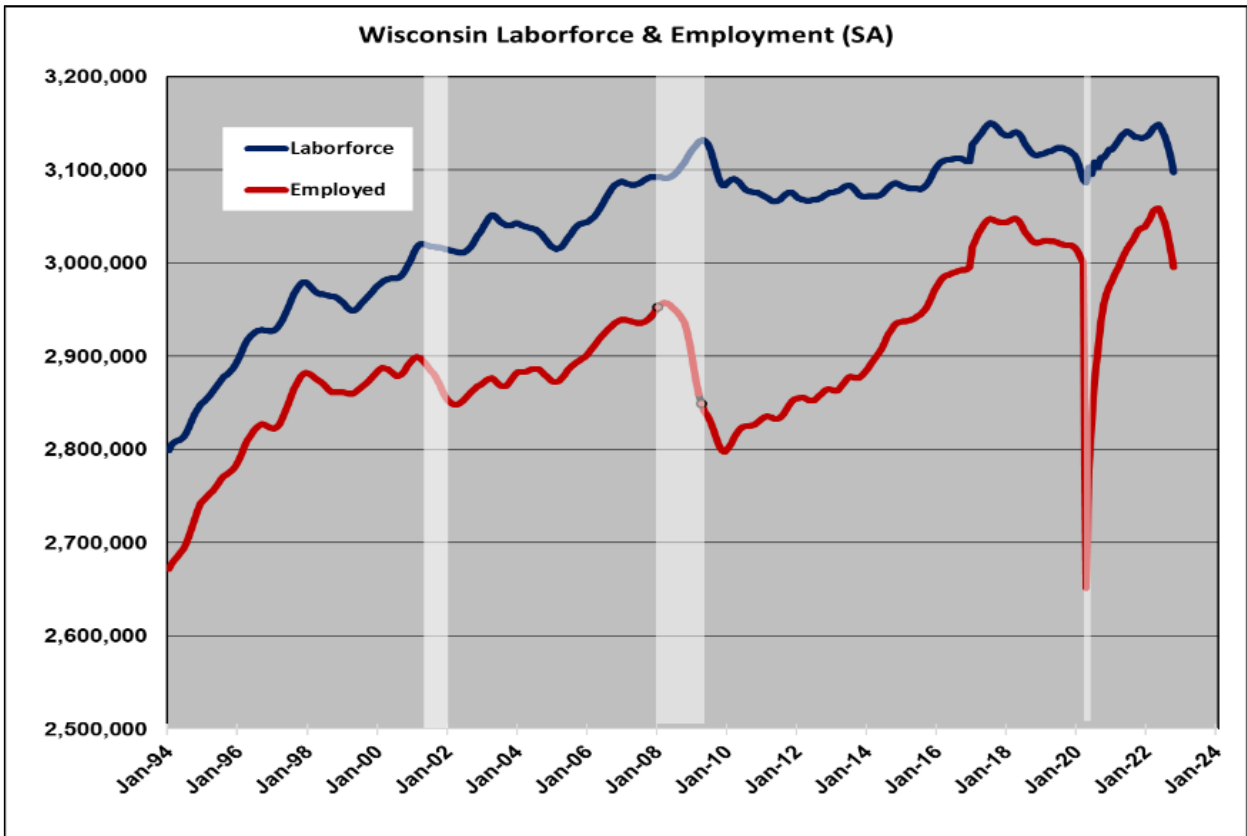
The key labor market trend in Wisconsin is about workforce quantity. The fundamental challenge is finding enough workers to fill jobs across all industries and regions. As baby boomers continue their exodus out of the workforce, the need to "find every body available and get everybody trained up to the person's fullest potential" is crucial. See '*Workforce constraints limit growth*' discussion below.

Employment and Unemployment

Wisconsin's labor force held relatively steady through the pandemic, while employment dropped severely and then recovered quickly. See Figure 6.

The employment fluctuations pushed the unemployment rate to 14.1% in April 2020. As employment recovered, the unemployment rate fell to new lows of 2.8% in March and April of 2022. Wisconsin's seasonally adjusted unemployment rate reached a record low of 2.4% in April 2023 and has remained at near historic lows and below the national unemployment rate in 2023. As of November 2023, Wisconsin's seasonally adjusted unemployment is 3.3%, 0.4 percentage points below the U.S. unemployment rate.

Figure 6: Wisconsin's Labor Force and Employment



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

Short-Run Employment Outlook

The short-run employment outlook for the state appears positive. Job levels continue to be high, with the state registering a record-high number of jobs in 2023.

Job gains coupled with higher wages translate into healthy consumption, which makes up two-thirds of the economy. Wage gains have been robust. However, the surge in inflation brought about by supply chain disruptions and the war in Europe have undercut the gains in real terms. State labor economists expect high inflation to be transitory while wage gains will be permanent. With continued job and wage gains, consumption will be the underpinning of economic growth.

The most prominent economic risk is the Federal Reserve Bank (Fed) aggressively combatting inflation through higher interest rates. The Fed raised interest rates seven times in 2022 – going from essentially zero to 5.0%. The Fed set a range of 25 basis points. As of November 1, 2023, the range is 5.25 – 5.50%.

Experts expect that inflation pressures will ease as supply chains readjust. As inflation pressures ease, the Fed will be able to conduct a more accommodative monetary policy. Tighter fiscal policy will have an influence over the coming years as well.

Businesses continue to voice lack of workforce talent as a primary constraint on production growth. Pursuit of workers has brought about wage and benefit increases, signing bonuses, and other incentives to attract workers. However, other workforce barriers remain, including transportation, dependent care, and housing affordability.

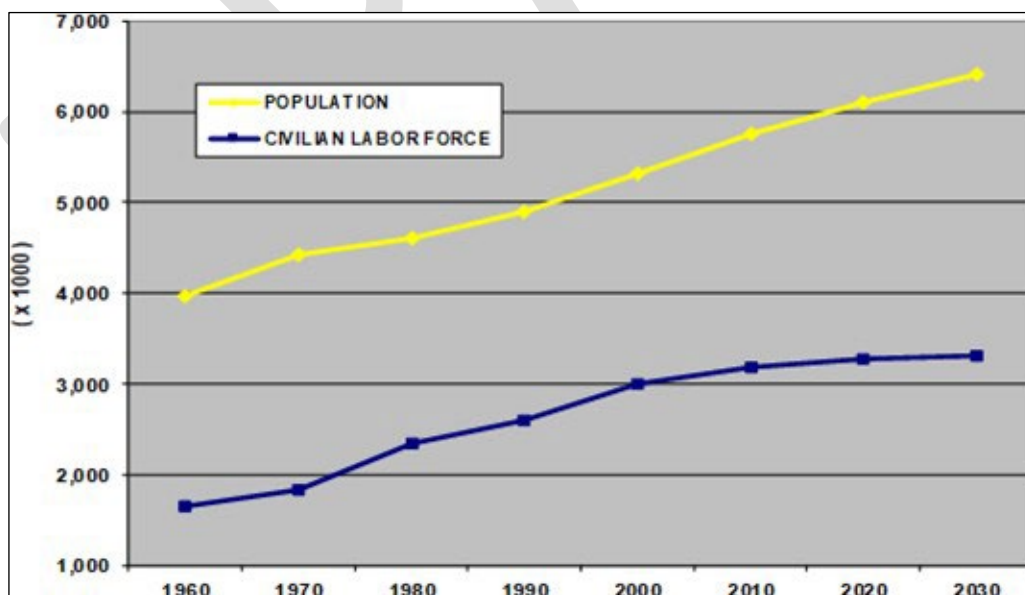
Long-Run Employment Outlook

Workforce quantity is the primary factor impacting Wisconsin's economic future. The demographic dynamics facing the state, other upper-Midwest states, the U.S., and most of the developed economies will advance unaltered in the coming decades and continue to create employment challenges.

While Wisconsin's population will continue to grow over the next 20 years, the workforce faces serious constraints. The labor force trend began to seriously flatten in 2008 after slowing in the late 1990s as the first baby boomers (those born in 1946) reached age 62 and began to leave the workforce. Baby boomers continue to exit the workforce in great numbers and will continue to do so over the next 20 years.

The number of retiring baby boomers nearly matches the influx of new workers, resulting in a slow-growing workforce. This constrains employers' ability to secure talent across industries. Many businesses report that the lack of available workers has hindered expansion, and in some cases, even curtailed the ability to meet current business needs.

Figure 7: Wisconsin Population and Labor Force



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

Worker skills must align with skills demanded by the position. For Wisconsin to successfully compete in the global economy, the state needs to develop homegrown talent, facilitate efficient connections among

employers and workers, improve the match between labor force skills and employer needs through training and education, attract fresh talent, and improve job quality and investment in family-sustaining careers.

Unemployment

In annual average 2022 data, there were 99,100 unemployed people in Wisconsin. Out of that total, 34,100 people were unemployed less than five weeks, 36,200 people were unemployed between five and 14 weeks, 13,600 people were unemployed between 15 and 26 weeks, and 15,300 people were unemployed 27 weeks or more.

Per the chart below, both the average duration of unemployment and the share of long-term unemployed peaked during the Great Recession and trended downward until 2021. Because the pandemic's impact largely began in March 2020, the first month an individual potentially would be considered long-term unemployed (27+ weeks) due to COVID-19 is September 2020. This explains the unexpectedly low figures in the 2020 data, which averages figures from January through December 2020. Instead of showing in 2020 figures, the COVID-19 impact appears in 2021, with a subsequent drop in 2022.

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 workers to fill open positions. Employers in most industries and occupations voiced concerns about the lack of workforce available.

Opportunities in healthcare, 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 such as welding, CNC operators, IT engineers and technicians, and healthcare practitioners and technicians are lacking, 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

From 2020 to 2022, U.S. Census Population Estimate Program figures show net migration had a negligible impact on Wisconsin's population. The Wisconsin general fertility rate per 1,000 women aged 15 to 44 declined from 61.8 in 2014 to 55.7 in 2021, and Wisconsin's population growth from natural increase is predicted to slow over the next two decades. The percentage of Wisconsin's population 65 years and older was 18.0% in 2020, and that percentage is expected to increase to 23.7% in 2040. Meanwhile, the percentage of the working age population goes from 60.4% in 2020 to a projected 55.1% in 2040.

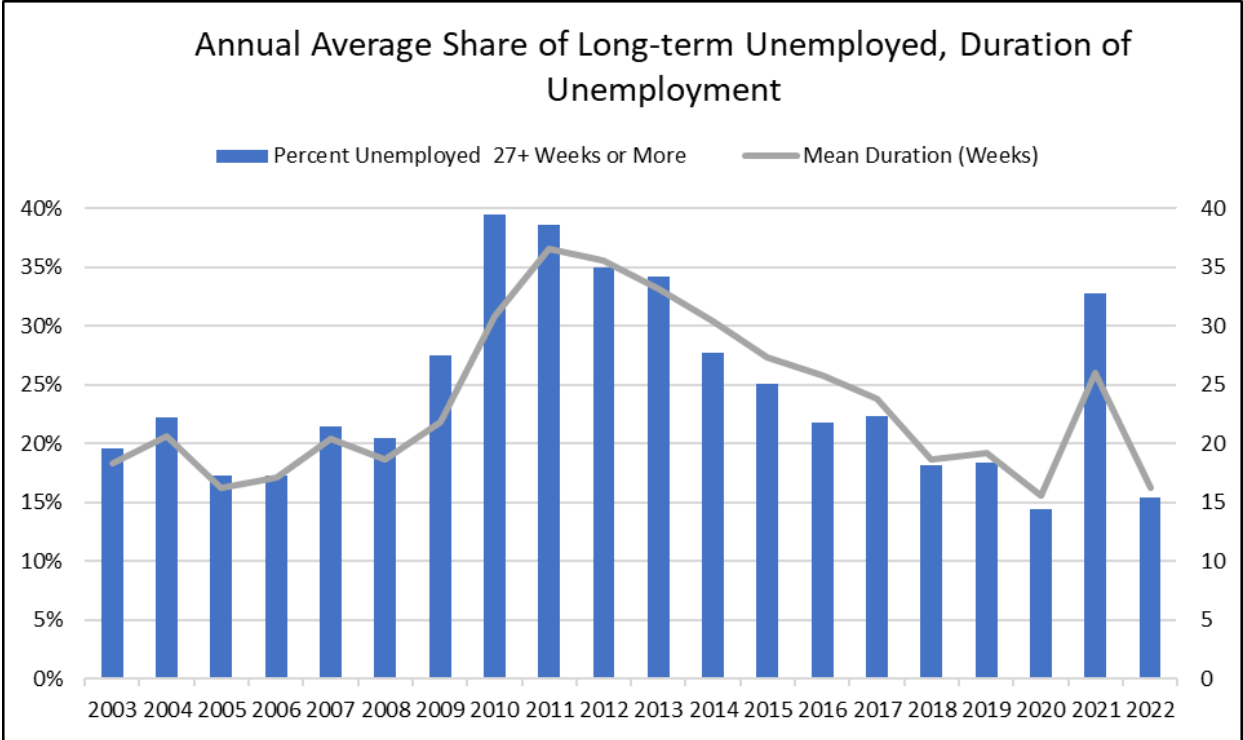
Using February 2020 as a base point, the national labor force participation rate (LFPR) for age 55+ workers has decreased at a higher percentage than the overall LFPR as of September 2023 data. If the trend continues, it does not bode well for Wisconsin's labor force as an older state. Changes in LFPR, 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.

Figure 8: Annual Average Share of Long-Term Unemployed

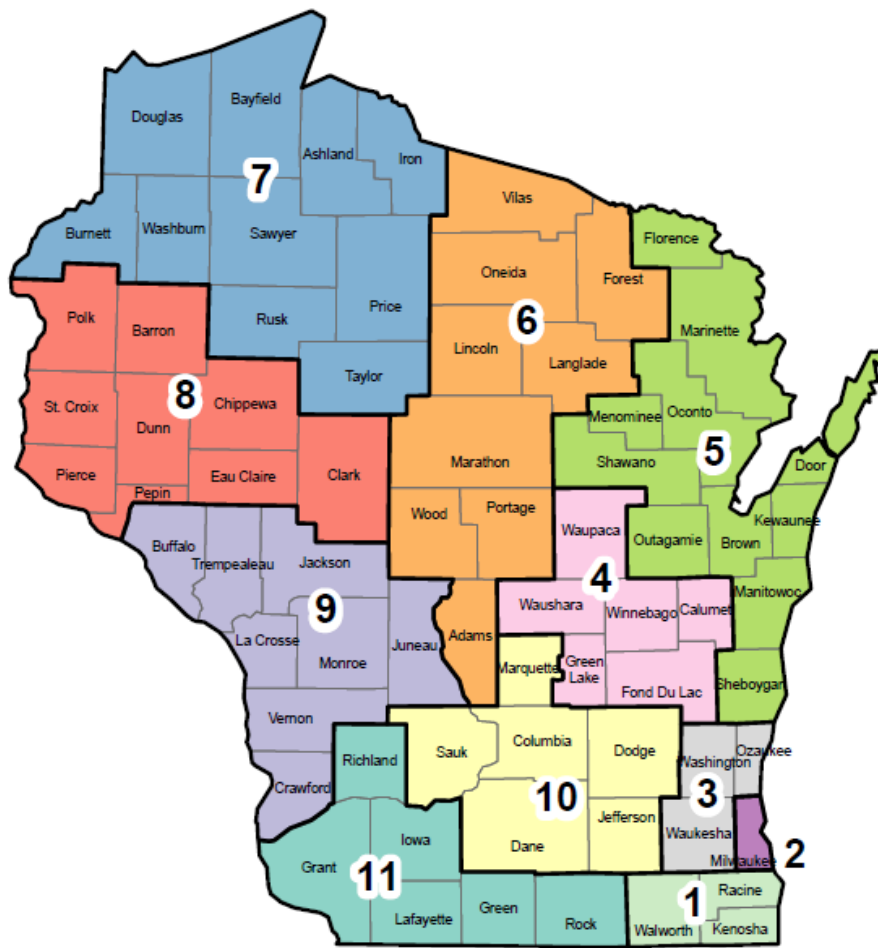


Source: Office of Economic Advisors, Wisconsin Department of Workforce Development

Regional Analysis

Wisconsin has 11 regional Workforce Development Areas (WDAs) that serve as a jurisdiction for the administration of workforce development activities and execution of adult, dislocated worker, and youth funds allocated by the state.

Wisconsin's Workforce Development Areas



WDA 1 - Southeast	WDA 5 - Bay Area	WDA 9 - Western
WDA 2 - Milwaukee	WDA 6 - North Central	WDA 10 - South Central
WDA 3 - WOW	WDA 7 - Northwest	WDA 11 - Southwest
WDA 4 - Fox Valley	WDA 8 - West Central	

Bay Area WDA

The Bay Area Workforce Development Area (WDA) is composed of 11 counties in northeastern Wisconsin: Brown, Door, Florence, Kewaunee, Manitowoc, Marinette, Menominee, Oconto, Outagamie, Shawano, and Sheboygan. It is not the most populous Workforce Development Area, nor does it contain the largest labor force or job base. Further, because the area is geographically large, changes in the labor force, jobs, wages, and income will vary, sometimes significantly, from one county to the next.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	436,320	438,479	-0.49%
Employed	424,538	423,247	0.31%
Unemployed	11,782	15,232	-22.65%
Unemployment Rate	2.7%	3.5%	-22.86%

In calendar year 2022, Bay Area's labor force totaled 436,320 participants consisting of 424,538 employed and 11,782 unemployed. From 2021 to 2022, the labor force decreased by 2,159 participants, or 0.49 percent. While the number of employed rose by 0.31 percent over the year, the number of unemployed fell by 22.65 percent.

The Bay Area's unemployment rate was 2.7 percent in 2022; a 0.8 percentage point decrease from 2021. This rate was lower than the statewide rate of 2.9 percent. In recent years, the Bay Area region experienced a lower unemployment rate than that seen statewide.

The Bay Area's Labor Force Participation Rate (LFPR) in 2022 was 64.0 percent. The regional LFPR decreased by 1.4 percentage points relative to 2021.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	416,263	409,393	1.68%	3.36%
Natural Resources & Mining	6,476	6,435	0.64%	0.40%
Construction	22,500	21,927	2.61%	1.78%
Manufacturing	93,008	90,753	2.48%	2.27%
Trade, Transportation, Utilities	79,390	78,170	1.56%	7.43%
Information	3,145	3,102	1.39%	2.40%
Financial Activities	21,822	22,609	-3.48%	0.96%
Professional & Business Services	38,843	39,121	-0.71%	2.05%
Education & Health Services	82,757	82,062	0.85%	2.70%
Leisure and Hospitality	41,438	39,073	6.05%	0.96%
Other Services	10,513	10,327	1.80%	2.90%

Public Administration	15,676	15,388	1.87%	1.85%
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In calendar year 2022, the total job base in the Bay Area region numbered 416,263 jobs; 6,870 more jobs than in 2021, up about 1.68 percent.

The **Manufacturing** supersector saw an increase of 2,255 jobs over the year: up 2.48 percent. In addition, the **Leisure and Hospitality** (+2,365 jobs, 6.05 percent) and **Construction** (+573 jobs, 2.61 percent) sectors were among the fastest growing industries in the Bay Area over the course of 2022. Employment in the Bay Area's largest supersector, **Education and Health Services**, grew by a more modest 0.85 percent. The only two industries that experienced employment declines in 2022 were **Financial Activities** (-787 jobs) and **Professional and Business Services** (-278 jobs).

Total area wages increased from \$21.8 billion in 2021 to \$23.3 billion in 2022. Area wages grew by \$1.5 billion (6.81 percent) from 2021 to 2022; this rate was lower than the statewide rate of 8.02 percent. **Trade, Transportation, Utilities** is a previously unmentioned industry that experienced relatively high total wage growth in 2022 (+7.29 percent). **Financial Activities** was the only industry with an annual decline in total wages (-0.72 percent).

Fox Valley WDA

The Fox Valley Workforce Development Area (WDA) is composed of six counties in northeastern Wisconsin: Calumet, Fond du Lac, Green Lake, Waupaca, Waushara, and Winnebago. This WDA is the seventh largest (out of 11) in the state in terms of labor force, while also having the third lowest unemployment rate and sixth highest labor force participation rate. Many of the region's urban cores are situated along the I-41 corridor, wholly containing two Metropolitan Statistical Areas (Oshkosh-Neenah and Fond du Lac) while Calumet County is included as part of the Appleton MSA.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	221,351	222,436	-0.49%
Employed	215,490	214,977	0.24%
Unemployed	5,861	7,459	-21.42%
Unemployment Rate	2.6%	3.4%	-23.53%

In calendar year 2022, Fox Valley's labor force totaled 221,351 participants consisting of 215,490 employed and 5,861 unemployed. From 2021 to 2022, the labor force declined by 1,085 participants: a 0.49 percent decrease. While the number of employed rose by 0.24 percent over the year, the number of unemployed fell by 21.42 percent.

The Fox Valley's unemployment rate was 2.6 percent in 2022; a 0.8 percentage point decrease from 2021. This rate was lower than the statewide rate of 2.9 percent. Generally, the Fox Valley region experiences a lower unemployment rate than that seen statewide.

The Fox Valley's Labor Force Participation Rate (LFPR) in 2022 was 64.3 percent. The regional LFPR decreased by 0.8 percentage points relative to 2021.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	183,747	181,411	1.29%	3.36%
Natural Resources & Mining	3,413	3,405	0.23%	0.40%
Construction	10,933	10,621	2.94%	1.78%
Manufacturing	45,327	44,848	1.07%	2.27%
Trade, Transportation, Utilities	32,658	32,557	0.31%	7.43%
Information	221	3,276	-93.25%	2.40%
Financial Activities	7,293	7,309	-0.22%	0.96%
Professional & Business Services	16,887	16,025	5.38%	2.05%
Education & Health Services	34,775	34,868	-0.27%	2.70%
Leisure and Hospitality	15,442	14,969	3.16%	0.96%
Other Services	703	5,006	-85.96%	2.90%
Public Administration	8,676	8,526	1.76%	1.85%

In calendar year 2022, the total job base in the Fox Valley region numbered 183,747 jobs; 2,336 more jobs than in 2021, up about 1.29 percent.

The **Professional & Business Services** supersector saw the largest numerical job increase in the Fox Valley, up 862 jobs over the year (5.38 percent). In addition, the **Leisure and Hospitality** (+473 jobs, 3.16 percent) and **Construction** (+312 jobs, 2.94 percent) sectors were also among the fastest growing industries in the Fox Valley over the course of 2022. Employment in the Fox Valley's largest supersector, **Manufacturing**, grew by a more modest 1.07 percent, but experienced the second largest numerical job gain. Besides **Other Services** (-4,303), three industries experienced a net loss of jobs in 2022: **Information** (-3,055), **Education and Health Services** (-93), and **Financial Activities** (-16).

Total area wages increased from \$9.6 billion in 2021 to \$10.2 billion in 2022. Area wages grew by \$596 million (6.21 percent) from 2021 to 2022; this rate was lower than the statewide rate of 8.02 percent. **Trade, Transportation, Utilities** (+6.35 percent) and **Natural Resources & Mining** (+6.34 percent) are two previously unmentioned industries that experienced relatively high total wage growth in 2022. **Information** (-94.78 percent) and **Other Services** (-84.11 percent) were the two industries with an annual decline in total wages.

Milwaukee WDA

The Milwaukee Workforce Development Area consists of Milwaukee County, which is in the southeastern part of the state. The Milwaukee WDA holds the distinction of being Wisconsin's only single county WDA. However, it is undoubtedly linked to its surrounding regions, and it would be naïve to ignore the regional interdependence. The relatively small geographic size of Milwaukee provides the opportunity for employers to draw from a potential workforce that includes surrounding areas, and Milwaukee WDA residents can look outside the region for desirable career prospects.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	459,063	464,620	-1.20%
Employed	442,178	439,453	0.62%
Unemployed	16,885	25,167	-32.91%
Unemployment Rate	3.7%	5.4%	-31.48%

In calendar year 2022, Milwaukee's labor force totaled 459,063 participants consisting of 442,178 employed and 16,885 unemployed. From 2021 to 2022, the labor force lost 2,725 participants: a 1.20 percent decrease. While the number of employed rose by 0.62 percent over the year, the number of unemployed fell by 31.48 percent.

The Milwaukee's unemployment rate was 3.70 percent in 2022; a 1.70 percentage point decrease from 2021. This rate was higher than the statewide rate of 2.9 percent. Generally, the single county WDA experiences a higher unemployment rate than that seen statewide.

Milwaukee's Labor Force Participation Rate (LFPR) in 2022 was 62.2 percent. The regional LFPR decreased by 0.5 percentage points relative to 2021.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	463,793	455,415	1.84%	3.36%
Natural Resources & Mining	74	65	13.85%	0.40%
Construction	11,898	11,298	5.31%	1.78%
Manufacturing	47,796	46,678	2.40%	2.27%
Trade, Transportation, Utilities	77,910	77,772	0.18%	7.43%
Information	8,301	8,348	-0.56%	2.40%
Financial Activities	29,621	29,235	1.32%	0.96%
Professional & Business Services	72,367	71,226	1.60%	2.05%
Education & Health Services	136,212	137,097	-0.65%	2.70%
Leisure and Hospitality	47,028	40,994	14.72%	0.96%
Other Services	13,590	13,507	0.61%	2.90%
Public Administration	18,995	19,194	-1.04%	1.85%

In calendar year 2022, the total job base in the Milwaukee region numbered 463,793 jobs; 8,378 more jobs than in 2021, up about 3.36 percent.

The *Leisure and Hospitality* supersector saw an increase of 6,034 jobs over the year: up 14.72% percent. This sector in particular was adversely affected by the changes in economic activity resulting from the

COVID-19 pandemic, and subsequently experienced more rapid recoveries the following years. **Public Administration** and **Information** were the only two supersector to lose jobs between 2021 and 2022. They declined by 1.04% and 0.56% respectively.

Total area wages increased from \$28.2 billion in 2021 to \$30.0 billion in 2022. Area wages grew by \$1.7 billion (6.14 percent) from 2021 to 2022; this rate was lower than the statewide rate of 8.0 percent.

Previously unmentioned industries that experienced relatively high total wage gains include **Construction** (+9.82%) and **Financial Activities** (+9.91%). **Natural Resources** was the only industry measure a decline in total wages (-.28.5%). It is also the smallest industry in terms of total employment, which makes it more susceptible to volatility.

North Central WDA

The North Central Workforce Development Area (WDA) consists of nine counties located in the Northern center of Wisconsin: Adams, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Vilas, and Wood counties. Notable for this region is the relatively higher median age seen in many of the counties.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	207,363	209,972	-1.24%
Employed	201,003	201,835	-0.41%
Unemployed	6,360	8,137	-21.84%
Unemployment Rate	3.1%	3.9%	-20.51%

In calendar year 2022, North Central's labor force totaled 207,363 participants consisting of 201,003 employed and 6,360 unemployed. From 2021 to 2022, the labor force decreased by 2,609 participants; a 1.24% decrease. The number of employed decreased by 0.41% over the year and the number of unemployed decreased by 21.84% over the year.

The North Central region's unemployment rate was 3.1% in 2022, down from 3.9% in 2021. This rate was still higher than the statewide unemployment rate of 2.9%. Generally, the North Central region experiences a higher unemployment rate than that seen statewide.

The labor force participation rate (LFPR) is defined as the share of the 16 and older non-institutional population (not incarcerated or in nursing facilities) that is in the labor force (working or seeking work). North Central Wisconsin's labor force participation rate (LFPR) in 2022 was 59.7%, sitting well below the state's LFPR of 64.3%. The region's LFPR decreased by 0.9 percentage points relative to 2021. It's likely that both the state and the national LFPR will continue to decline as the "baby boomer" population continues to age.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
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Total, All Industries	188,790	186,272	1.35%	3.36%
Natural Resources & Mining	3,555	3,612	-1.58%	0.40%
Construction	7,927	7,738	2.44%	1.78%
Manufacturing	34,483	33,698	2.33%	2.27%
Trade, Transportation, Utilities	40,917	40,655	0.64%	7.43%
Information	2,363	2,399	-1.50%	2.40%
Financial Activities	13,486	13,361	0.94%	0.96%
Professional & Business Services	12,786	12,411	3.02%	2.05%
Education & Health Services	39,628	39,717	-0.22%	2.70%
Leisure and Hospitality	19,632	18,725	4.84%	0.96%
Other Services	4,784	4,947	-3.29%	2.90%
Public Administration	9,189	9,010	1.99%	1.85%

In calendar year 2022, the total job base in the North Central region numbered 183,790 jobs; 2,518 more jobs than in 2021, up 3.36%.

Leisure & Hospitality experienced the greatest proportional gain in jobs, gaining 907 jobs over the year; an increase of 4.84%. Statewide, this industry grew at a slower rate of 0.94%. Across geographies and industries, Leisure & Hospitality was the most negatively impacted industry from COVID-19 – priming its recovery for high employment growth rates. Other Services experienced the greatest proportional loss of jobs, losing 163 jobs over the year; a decrease of 3.29%.

Total area wages increased from 9.24 billion in 2021 to 9.82 billion in 2022. Area wages grew by 582.52 million (6.3%) over the year, growing slower than statewide wages (8.0%). Leisure & Hospitality wages grew at the fastest rate in North Central, growing by 12.2%. Education & Health Services wages grew at the slowest rate in North Central, growing by 3.3%.

Northwest WDA

The Northwest WDA region consists of Ashland, Bayfield, Burnett, Douglas, Iron, Price, Rusk, Sawyer, Taylor, and Washburn counties.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	85,904	87,589	-1.92%
Employed	82,479	83,469	-1.19%
Unemployed	3,425	4,120	-16.87%
Unemployment Rate	4.0%	4.7%	-14.89%

The labor force participation rate (LFPR) is defined as the share of the 16 and older non-institutional population (not incarcerated or in nursing facilities) that is in the labor force (working or seeking work). The 2022 LFPR in the Northwest WDA was 56.8%, down -2.1 percentage points from 2021. This was lower

than the state's overall -1.3 percentage point decrease in LFPR. The Northwest WDA had by far the lowest LFPR of any WDA in Wisconsin, 1.8 percentage points lower than the second lowest WDA and 7.5 percentage points lower than Wisconsin as a whole.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	64,679	63,643	1.63%	3.36%
Natural Resources & Mining	1,044	1,020	2.35%	0.40%
Construction	3,382	2,910	16.22%	1.78%
Manufacturing	12,075	11,742	2.84%	2.27%
Trade, Transportation, Utilities	12,917	12,822	0.74%	7.43%
Information	514	505	1.78%	2.40%
Financial Activities	2,044	1,982	3.13%	0.96%
Professional & Business Services	3,226	3,208	0.56%	2.05%
Education & Health Services	13,597	13,847	-1.81%	2.70%
Leisure and Hospitality	7,914	7,734	2.33%	0.96%
Other Services	1,526	1,518	0.53%	2.90%
Public Administration	6,428	6,158	4.38%	1.85%

The covered employment in the Northwest WDA region was 64,679 in 2022, representing 2.2% of the overall jobs in the state. This is a small decrease over the region's 2021 percentage of overall jobs. The three largest supersectors in terms of employment are Education & Health Services Manufacturing, Trade, Transportation, Utilities and Manufacturing. These three industries represent 59.66% of all jobs in Northwest Wisconsin. Two of the three saw an increase in employment from 2021 to 2022. Manufacturing had an employment increase of 2.84%. Trade, Transportation, Utilities increased 0.74%. Education & Healthcare decreased 1.81%. The industry supersector that saw the largest employment growth was Construction with a 16.22% increase.

Overall wages (without accounting for inflation) in Northwest Wisconsin grew 4.84% which was slower than the employment growth rate of 4.94%. All but two supersectors in the Northwest Wisconsin experienced positive wage growth. Financial Activities saw the largest percentage increase at 10.58%. Other Services wages grew 8.80%. Information wages declined 3.35% and Natural Resources & Mining wages decreased -1.38%.

South Central WDA

The South Central WDA is composed of six counties (Columbia, Dane, Dodge, Jefferson, Marquette and Sauk). This includes a portion of the Madison MSA (Columbia, Dane, Iowa and Green counties).

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	496,428	496,433	0.00%
Employed	484,785	481,035	0.78%
Unemployed	11,643	15,398	-24.39%
Unemployment Rate	2.3%	3.1%	-25.81%

The labor force participation rate (LFPR) is defined as the share of the 16 and older non-institutional population (not incarcerated or in nursing facilities) that is in the labor force (working or seeking work). The 2021 LFPR in the WDA was 67.6%, a decline of 3.1 percentage points from 2021. Despite this decline, this WDA outpaced the state's overall LFPR. The South Central WDA had a noticeably higher LFPR than the state as a whole: 67.6% compared to the state's 64.3%. Much of this is driven by Dane County's LFPR, which is the fourth highest in the state at 68.7%, a decline from 72.7% the previous year.

Dane County, home to the capitol and the University of Wisconsin-Madison, has a younger population and more diverse population than other counties in the region. The unemployment rate in South Central WDA of 2.3% in 2022 was the lowest in the state. This represents a decline of 0.8 percentage points in the unemployment rate since 2021. The overall size of the labor force stayed roughly the same, only a decline in the number of unemployed concomitant with an increase in the number of employed.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	474,624	464,028	2.28%	3.36%
Natural Resources & Mining	5,205	4,964	4.85%	0.40%
Construction	24,152	23,420	3.13%	1.78%
Manufacturing	59,617	59,143	0.80%	2.27%
Trade, Transportation, Utilities	77,153	76,640	0.67%	7.43%
Information	18,560	17,668	5.05%	2.40%
Financial Activities	26,053	25,917	0.52%	0.96%
Professional & Business Services	56,202	57,274	-1.87%	2.05%
Education & Health Services	115,787	114,024	1.55%	2.70%
Leisure and Hospitality	48,417	43,715	10.76%	0.96%
Other Services	13,969	13,429	4.02%	2.90%
Public Administration	28,077	27,832	0.88%	1.85%

The dominant sector in South Central are Educational Services which accounts for 24.4% of the total employment and 24.7% of the total wages in the region. This industry experienced a growth rate of 1.55% between 2021 and 2022. The fastest growing industry in the South Central WDA was Leisure and Hospitality, which experienced 10.8% employment growth over the year. This vastly outpaced that

industry's employment growth in the state, which only grew by 0.96%. In contrast, the state experienced a 7.43% increase in employment in the Trade, Transportation, and Utilities industry while the South Central region's industry only grew by 0.67%. The Professional and Business Services industry was the only industry in the South Central WDA which experienced a decline in employment, at a rate of -1.87%.

Total payroll reported for South Central was \$30.7 billion, an increase of 7.8% from 2021 to 2022, without accounting for inflation. This puts the region roughly on par with the state overall, which grew at a rate of 8.0%. In terms of total wages, the fastest-growing industry in the South Central WDA was Information, which experienced a 26.3% growth in wages, far outpacing the 13.7% growth statewide. This highlights the importance increasing importance of the Information industry to the region's economy.

Southeastern WDA

The Southeastern Workforce Development Area consists of three counties in the southeastern most part of the state. The region includes Kenosha County, Racine County, and Walworth County. The City of Kenosha and the City of Racine provide ample opportunities for job development within the region, while Milwaukee and Chicago provide employment opportunities outside of the region.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	245,488	246,082	-0.24%
Employed	237,428	235,367	0.88%
Unemployed	8,060	10,715	-24.78%
Unemployment Rate	3.3%	4.4%	-25.00%

In calendar year 2022, Southeastern labor force totaled 245,488 participants consisting of 237,428 employed and 8,060 unemployed. From 2021 to 2022, the labor force lost 594 participants: a 0.24% decrease. While the number of employed rose by 0.88% over the year, the number of unemployed fell by 24.78%.

The Southeastern WDA unemployment rate was 3.3% in 2022; a 1.1 percentage point decrease from 2021. This rate was higher than the statewide rate of 2.9%. Generally, the WDA experiences a slightly higher unemployment rate than that seen statewide but follows similar trends.

The Labor Force Participation Rate (LFPR) for the WDA in 2021 was 64.5%. The regional LFPR decreased by 0.7 percentage points relative to 2021.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	187,251	182,997	2.32%	3.36%
Natural Resources & Mining	1,107	1,070	3.46%	0.40%
Construction	6,866	6,808	0.85%	1.78%
Manufacturing	35,788	34,265	4.44%	2.27%

Trade, Transportation, Utilities	46,030	44,906	2.50%	7.43%
Information	768	850	-9.65%	2.40%
Financial Activities	4,752	4,766	-0.29%	0.96%
Professional & Business Services	18,807	18,044	4.23%	2.05%
Education & Health Services	38,096	38,110	-0.04%	2.70%
Leisure and Hospitality	21,845	21,000	4.02%	0.96%
Other Services	4,392	4,430	-0.86%	2.90%
Public Administration	8,797	8,748	0.56%	1.85%

In calendar year 2022, the total job base in the Southeastern region numbered 187,251 jobs: 4,254 more jobs than in 2021, up about 3.36%.

The **Manufacturing** supersector saw an increase of 1,523 jobs over the year: up 4.44%, which was the largest numeric and percent gain in the WDA. The **Professional & Business Services** supersector saw the second highest percent gain (+4.23%). Notably, **Leisure and Hospitality** growth (+4.02%) exceeded statewide growth in the industry (+0.96%) These sectors in particular were adversely affected by the changes in economic activity resulting from the COVID-19 pandemic.

Total area wages increased from \$9.4 billion in 2021 to \$10.0 billion in 2022. Area wages grew by \$640.6 million (6.83%) from 2021 to 2022; this rate was lower than the statewide rate of 8.0%. Previously unmentioned industries that experienced relatively high total wage gains include **Natural Resources and Mining** (+13.38%) and (+10.94%), and **Trade, Transportation, Utilities** (+8.10%). **Information** was the only industry with declining total wages (-39.05%). It is also the smallest industry in terms of total employment, which makes it more susceptible to volatility.

Southwest WDA

The Southwest WDA region is composed of six counties (Grant, Green, Iowa, Lafayette, Richland and Rock).

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	165,764	166,616	-0.51%
Employed	160,725	160,202	0.33%
Unemployed	5,039	6,414	-21.44%
Unemployment Rate	3.0%	3.8%	-21.05%

The Southwest WDA remained relatively stable, only experiencing a small decline in the overall labor force between 2021 and 2022. Despite this decline, the number of employed slightly increased while the number of unemployed people experienced a massive decline. Between 2021 and 2022, the number of unemployed declined 21.4%. This meant that the Southwest experienced an unemployment rate of 3.0% in 2022, only slightly above the state's overall unemployment rate of 2.9%.

The labor force participation rate (LFPR), which is defined as the number of people working or seeking work as a percentage of the eligible working-age population, was 66.3% in the Southwest WDA. This is higher than Wisconsin's LFPR of 64.3%. This puts the Southwest WDA as the region with the third-highest LFPR in the state behind the South Central and WOW WDAs. Even still, the Southwest WDA experienced a decline in the LFPR compared to 2021's LFPR of 67.2%.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	119,393	117,664	1.47%	3.36%
Natural Resources & Mining	2,660	2,688	-1.04%	0.40%
Construction	5,754	5,591	2.92%	1.78%
Manufacturing	21,905	21,283	2.92%	2.27%
Trade, Transportation, Utilities	29,148	28,823	1.13%	7.43%
Information	1,734	1,909	-9.17%	2.40%
Financial Activities	3,466	3,550	-2.37%	0.96%
Professional & Business Services	8,686	8,456	2.72%	2.05%
Education & Health Services	26,493	26,458	0.13%	2.70%
Leisure and Hospitality	10,711	10,267	4.32%	0.96%
Other Services	2,678	2,535	5.64%	2.90%
Public Administration	6,161	6,104	0.93%	1.85%

The average monthly number of people employed in the Southwest WDA grew 1.47% from 2021 to 2022, a slightly lower rate of growth relative to the state, which grew at a rate of 3.36%. The three largest industries in the region were Trade, Transportation, and Utilities; Education and Health Services; and Manufacturing. All three of these industries experienced positive employment growth over this period. The largest of these, Education and Health Services, experienced essentially held steady in terms of employment, only increasing by 0.13%. This is slower compared to the state overall, Education and Health Services grew at a rate of 2.70% in Wisconsin. The Other Services industry was the fastest-growing industry, growing at a rate of 5.64%. However, this industry only represented 2.24% of the overall employment of the region. Due to the small size of this industry, a small change in absolute employment numbers can result in a relatively large percentage change. Similarly, the small Information industry declined by 9.17%, the fastest declining industry in the region. This contrasts with the state's Information industry, which grew by 2.40%.

In total, aggregates wages in the region increased by 6.17% from 2021 to 2022, without accounting for inflation. This is slightly slower than the state overall, in which total wages increased at a rate of 8.19%. The three fastest-growing industries in terms of total wages were Other Services; Leisure and Hospitality; and Professional and Business Services. Total wages in the Leisure and Hospitality industry grew quickly in the South Central WDA, at a rate of 11.69%. However, unlike the other two industries, Leisure and Hospitality in the region more slowly compared to the state overall where the industry's total wages grew by 17.24%.

West Central WDA

The West Central Workforce Development Area (WDA) is composed of nine counties in northwestern Wisconsin (Barron, Clark, Chippewa, Dunn, Eau Claire, Pepin, Pierce, Polk and St. Croix). It is among the state's fastest growing regions in terms of population and economic growth. The region also benefits from its location along the I-94 corridor, just east of the Twin Cities in Minnesota. The effects of this proximity can be seen throughout the region, though it is most obvious in the border counties.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	260,826	261,192	-0.14%
Employed	252,847	251,691	0.46%
Unemployed	7,979	9,501	-16.02%
Unemployment Rate	3.1%	3.6%	-13.89%

The labor force participation rate (LFPR) is defined as the share of the 16 and older non-institutional population (not incarcerated or in nursing facilities) that is in the labor force (working or seeking work). The 2022 LFPR in the West Central WDA was 65.7%, down -1.7 percentage points from 2021. This decrease was a larger than the state's overall decrease in LFPR. The labor force in West Central shrank by -366 overall. From 2021 to 2022, the labor force in five out of nine counties in the region experienced positive labor force growth.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	198,052	192,812	2.72%	3.36%
Natural Resources & Mining	3,169	3,205	-1.12%	0.40%
Construction	8,983	8,852	1.48%	1.78%
Manufacturing	37,337	36,068	3.52%	2.27%
Trade, Transportation, Utilities	43,447	41,645	4.33%	7.43%
Information	1,396	1,323	5.52%	2.40%
Financial Activities	7,044	6,948	1.38%	0.96%
Professional & Business Services	15,102	14,649	3.09%	2.05%
Education & Health Services	47,054	46,976	0.17%	2.70%
Leisure and Hospitality	20,024	19,003	5.37%	0.96%
Other Services	4,603	4,367	5.40%	2.90%
Public Administration	9,840	9,732	1.11%	1.85%

The covered employment in the West Central region was 198,052 in 2022, representing 6.88% of the overall jobs in the state. This is a decrease over the region's 2021 percentage of overall jobs – discontinuing the trend of an increasing proportion of Wisconsin's job base being in the region.

The three largest supersectors in terms of employment are Manufacturing, Health Care, and Retail Trade. Together, they represent 42.0% of all jobs in the region. Each of these supersectors witnessed an increase in employment from 2021 to 2022. The three supersectors which saw the largest percentage increase in employment were Information, Other Services, and Leisure and Hospitality. These three supersectors witnessed a 5.52%, 5.40%, and 5.37% increase in employment respectively.

Overall wage growth (without accounting for inflation) in the region outpaced employment growth at a rate of 5.13% compared to 2.72% for employment. Every single supersector in the West Central region experienced positive wage growth. With an aggregate wage growth rate of 10.06%, the fastest growing was Other Services. Despite this wage growth, the supersector still had one of the largest percentage point discrepancies between its percentage of the job base (2.32%) and percentage of overall wages (1.62%). Another notable wage growth was in the Professional & Business Services supersector, which saw a 6.40% increase in overall wages.

Western WDA

The Western Workforce Development Area (WDA) consists of eight counties: Buffalo, Crawford, Jackson, Juneau, La Crosse, Monroe, Trempealeau, and Vernon counties. Over half of the region's populace and labor force belongs to La Crosse and Monroe County.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	155,268	157,490	-1.41%
Employed	150,856	151,887	-0.68%
Unemployed	4,412	5,603	-21.26%
Unemployment Rate	2.8%	3.6%	-22.22%

In calendar year 2022, Western's labor force totaled 155,268 participants consisting of 150,856 employed and 4,412 unemployed. From 2021 to 2022, the labor force decreased by 2,222 participants; a 1.41% decrease. The number of employed decreased by 0.68% over the year and the number of unemployed decreased by 21.26% over the year.

The Western region's unemployment rate was 2.8% in 2022, down from 3.6% in 2021. This rate was also below the statewide unemployment rate of 2.9%. Generally, the Western region experiences a lower unemployment rate than that seen statewide.

The labor force participation rate (LFPR) is defined as the share of the 16 and older non-institutional population (not incarcerated or in nursing facilities) that is in the labor force (working or seeking work). Western Wisconsin's labor force participation rate (LFPR) in 2022 was 63.5%, sitting slightly below the state's LFPR of 64.3%. The region's LFPR decreased by 1.3 percentage points relative to 2021. It's likely that both the state and the national LFPR will continue to decline as the "baby boomer" population continues to age.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	138,270	136,813	1.06%	3.36%
Natural Resources & Mining	2,831	2,764	2.42%	0.40%
Construction	5,423	5,218	3.93%	1.78%
Manufacturing	22,238	22,262	-0.11%	2.27%
Trade, Transportation, Utilities	29,938	29,185	2.58%	7.43%
Information	1,057	1,052	0.48%	2.40%
Financial Activities	6,330	6,270	0.96%	0.96%
Professional & Business Services	9,500	9,465	0.37%	2.05%
Education & Health Services	36,050	36,107	-0.16%	2.70%
Leisure and Hospitality	13,003	12,584	3.33%	0.96%
Other Services	3,567	3,486	2.32%	2.90%
Public Administration	8,338	8,412	-0.88%	1.85%

In calendar year 2022, the total job base in the Western region numbered 138,270 jobs; 1,457 more jobs than in 2021, up 1.06%.

Construction experienced the greatest proportional gain in jobs, gaining 205 jobs over the year; an increase of 3.93%. Leisure & Hospitality grew at the second fastest rate, increasing by 3.33%. Statewide, this industry grew at a slower rate of 0.94%. Across geographies and industries, Leisure & Hospitality was the most negatively impacted industry from COVID-19 – priming its recovery for high employment growth rates. Public Administration experienced the greatest proportional loss of jobs, losing 74 jobs over the year; a decrease of 0.88%.

Total area wages increased from 13.26 billion in 2021 to 14.00 billion in 2022. Area wages grew by 368.58 million (5.6%) over the year, growing slower than statewide wages (8.0%). Natural Resources & Mining wages grew at the fastest rate in Western, growing by 11.8%. Manufacturing wages grew at the slowest rate in Western, growing by 2.5%.

WOW WDA

The WOW Workforce Development Area consists of three counties in the southeastern part of the state. The region includes Waukesha County, Ozaukee County, and Washington County. The WOW WDA is undoubtedly linked to the Milwaukee WDA. Much of the past growth and development in the region is a direct result of urban sprawl from the City of Milwaukee. The region relies on Milwaukee as a cultural and employment center, and Milwaukee relies on WOW residents to work and engage in recreation in the city.

Labor Force (LAUS)

	2022	2021	Percentage Change
Labor Force	348,355	348,858	-0.14%
Employed	339,721	337,905	0.54%

Unemployed	8,634	10,953	-21.17%
Unemployment Rate	2.5%	3.1%	-19.35%

In calendar year 2022, WOW's labor force totaled 348,355 participants consisting of 339,721 employed and 8,634 unemployed. From 2021 to 2022, the labor force lost 503 participants: a 0.14% decrease. While the number of employed rose by 0.54% over the year, the number of unemployed fell by 21.17%.

The WOW WDA unemployment rate was 2.5% in 2022; a 0.6 percentage point decrease from 2021. This rate was lower than the statewide rate of 2.9%. Generally, the WDA experiences a lower unemployment rate than that seen statewide.

The Labor Force Participation Rate (LFPR) for the WDA in 2022 was 66.5%. The regional LFPR decreased by 0.3 percentage points relative to 2021.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2022	WDA Monthly Employment 2021	WDA Percent Change	Percent Change Statewide
Total, All Industries	340,370	333,979	1.91%	3.36%
Natural Resources & Mining	1,409	1,371	2.77%	0.40%
Construction	22,177	21,716	2.12%	1.78%
Manufacturing	65,737	64,509	1.90%	2.27%
Trade, Transportation, Utilities	69,546	67,802	2.57%	7.43%
Information	4,175	4,175	0.00%	2.40%
Financial Activities	19,614	20,084	-2.34%	0.96%
Professional & Business Services	45,141	43,144	4.63%	2.05%
Education & Health Services	60,697	61,022	-0.53%	2.70%
Leisure and Hospitality	31,259	29,774	4.99%	0.96%
Other Services	11,003	10,779	2.08%	2.90%
Public Administration	9,612	9,605	0.07%	1.85%

In calendar year 2022, the total job base in the WOW region numbered 340,370 jobs; 6,391 more jobs than in 2021, up about 3.36%.

The **Leisure and Hospitalities** supersector saw an increase of 1,4085 jobs over the year: up 4.99%. This sector in particular was adversely affected by the changes in economic activity resulting from the COVID-19 pandemic, and subsequently experienced more rapid recoveries the following years. **Trade, Transportation, Utilities** had the largest numeric growth, gaining 1,744 jobs (+2.57%). **Financial Activities** was the only supersector to lose jobs (-2.34%).

Total area wages increased from \$20.3 billion in 2021 to \$21.5 billion in 2022. Area wages grew by \$1.2 billion (5.98%) from 2021 to 2022. This rate was lower than the statewide rate of 8.0%. **Leisure and Hospitalities** (+13.25%), **Professional and Business Services** (+8.89%), and **Natural Resources and**

Mining (+11.68%). It should be noted that Natural Resources and Mining makes up a relatively low share of total employment and wages in the region.

Education and Skill Levels of the Workforce:

Figure 9: Wisconsin Population Educational Attainment

AGE BY EDUCATIONAL ATTAINMENT		
Population 18 to 24 years	562,259	
Less than high school graduate	59,412	10.6%
High school graduate (includes equivalency)	208,947	37.2%
Some college or associate's degree	211,854	37.7%
Bachelor's degree or higher	82,046	14.6%
Population 25 years and over	4,088,500	
Less than 9th grade	99,448	2.4%
9th to 12th grade, no diploma	167,049	4.1%
High school graduate (includes equivalency)	1,209,135	29.6%
Some college, no degree	798,565	19.5%
Associate's degree	455,882	11.2%
Bachelor's degree	885,548	21.7%
Graduate or professional degree	472,873	11.6%
High school graduate or higher	3,822,003	93.5%
Bachelor's degree or higher	1,358,421	33.2%
Population 25 to 34 years	733,729	
High school graduate or higher	695,156	94.7%
Bachelor's degree or higher	283,445	38.6%
Population 35 to 44 years	742,993	
High school graduate or higher	697,716	93.9%
Bachelor's degree or higher	291,421	39.2%
Population 45 to 64 years	1,509,392	
High school graduate or higher	1,406,799	93.2%
Bachelor's degree or higher	481,242	31.9%
Population 65 years and over	1,102,386	
High school graduate or higher	1,022,332	92.7%
Bachelor's degree or higher	302,313	27.4%

Source: U.S. Census Bureau, 2022 American Community Survey 1-Year Estimates (Table S1501)

Comparing the Wisconsin population's education and training levels with the education levels expected to be necessary for future jobs suggests skills sets should be enhanced.

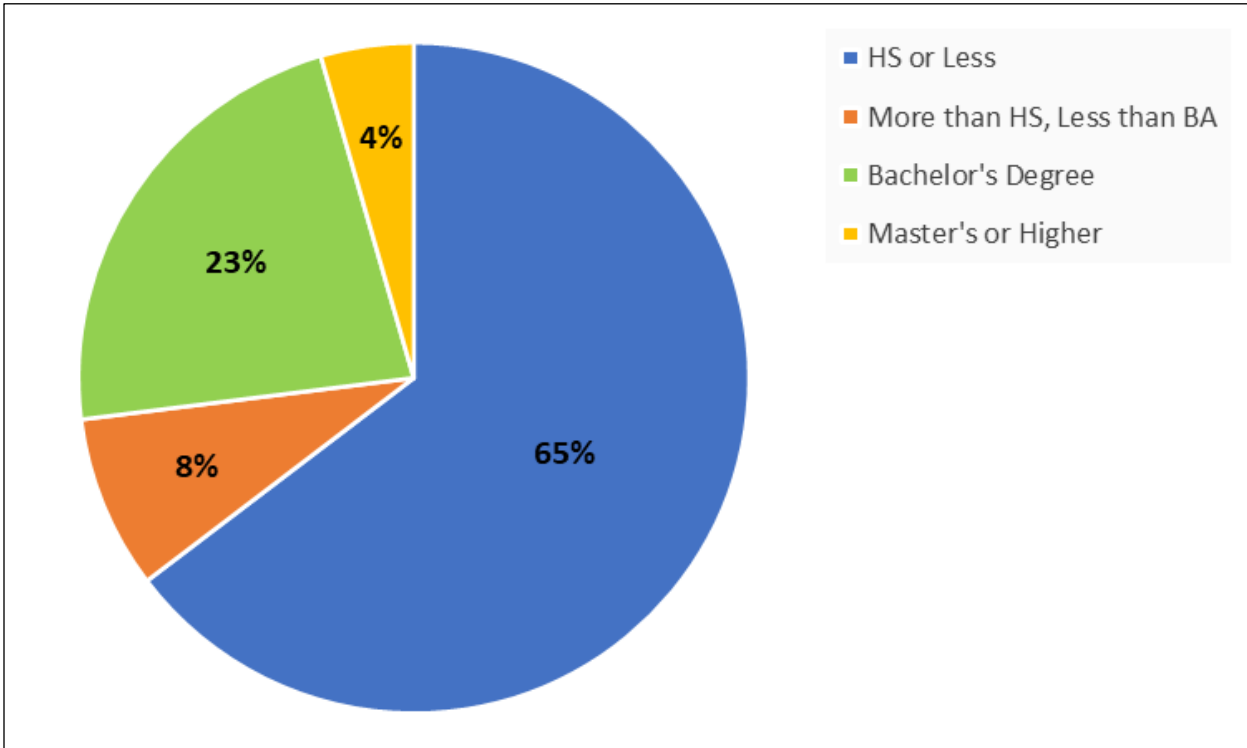
Figure 10: Typical Education for Entry Totals and Percent by Education Type 2020-2030

Typical Education for Entry	# Jobs - 2020	Percent of Total Job Base - 2020	# Jobs - 2030	Percent of Total Job Base - 2030	Numeric Change (2020-2030)	Percent Change (2020-2030)
No formal educational credential	644,369	21.37%	711,009	22.19%	66,640	10.34%
High school diploma or equivalent	1,263,028	41.89%	1,318,544	41.15%	55,516	4.40%
Some college, no degree	82,276	2.73%	81,637	2.55%	-639	-0.78%
Postsecondary non-degree award	202,328	6.71%	212,966	6.65%	10,638	5.26%
Associate degree	62,527	2.07%	68,310	2.13%	5,783	9.25%
Bachelor's degree	648,978	21.52%	691,473	21.58%	42,495	6.55%
Master's degree	46,964	1.56%	52,077	1.63%	5,113	10.89%
Doctoral or professional degree	64,557	2.14%	67,947	2.12%	3,390	5.25%
Total Job Base*	3,015,027	100%	3,203,963	100%	188,936	6.27%

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

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

Figure 11: Education Needed for Entry: Annual Growth Openings 2020-2030 – Percent of Total



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

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

2. WORKFORCE DEVELOPMENT, EDUCATION, AND TRAINING ACTIVITIES ANALYSIS

A. The State's Workforce Development Activities²³

Wisconsin's core programs, Combined State Plan partner programs, and one-stop system partner programs are coordinated through the following state agencies: Department of Workforce Development (DWD), Wisconsin Technical College System (WTCS), Wisconsin Department of Children and Families (DCF), and the Wisconsin Department of Health Services (DHS). The Governor's Council on Workforce

² Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

³ Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

Investment ensures that Wisconsin's workforce development efforts are aligned with the state's economic development and education efforts.

Wisconsin has 11 local workforce development areas (WDAs). Each area's certified local workforce development board (WDB) serves as a strategic convener to promote and broker effective relationships between the elected officials and economic, education and workforce partners in the local area. The state also has two planning regions: Planning Region A, comprised of WDAs 1, 2, and 3; and Planning Region B, comprised of WDAs 4 and 5.

DWD oversees the state's one-stop delivery system in partnership with local workforce development boards (WDBs). Wisconsin has 34 American Job Centers across the state, including 15 comprehensive and 19 affiliate job centers. 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 coordination of service delivery as required by federal law and guidance. The local WDBs carry out workforce activities by partnering locally as memorialized in Memorandums of Understanding (MOUs) to implement and operate core and partner programs through the one-stop delivery system. At this time, TANF is not a required one-stop partner program in Wisconsin.

Under WIOA, workforce activities are categorized within the following areas:

Supportive Services: In order to assist job seekers in obtaining or retaining employment through career or training services, Wisconsin's workforce development system offers various supportive services. Each local Workforce Development Board (WDB) in consultation with job center partners and other community service providers, must develop a policy on supportive services that ensures resource and service coordination in the local area and the WDB decides which supportive services will be offered in the local area and how they will deliver the services.

Supportive services are categorized as either information/referral to supportive services (considered no-cost services) or program-funded supportive services. Examples of supportive services may include, but are not limited to, referrals to community programs/services, referrals to state and federal public assistance programs, assistance in accessing childcare, transportation, housing, and educational testing, needs-related payments, reasonable accommodations for individuals with disabilities, tools and equipment, and uniforms and other work attire.

Career Services: WIOA has 13 required elements for career services, all of which support customers making informed decisions about their career choices and understanding the resources needed and available to assist them with pursuing their goals. All core programs provide career services as much as possible through co-location at job centers. Required partners provide career services through co-location, technological linkage, and utilization of trained staff to provide referrals at job centers.

Wisconsin continues to develop and implement tools to modernize and enhance the way participants engage with the public workforce development system. One example of modernization is the implementation of a case management application, the Comprehensive Employment Planning Tool (CEPT), that interfaces with several online tools that participants can access through the My JCW portal on jobcenterofwisconsin.com. The CEPT enhances the service delivery process by allowing participants and career planners to exchange information virtually, and includes a Budget Planner, Self-Sufficiency Calculator, Community Resources locator, Career Exploration tool, and Individual Employment Plan/Individual Service Strategy development tool. Collectively, these tools help participants build financial literacy, connect with resources to address potential barriers to program participation, identify

training and occupational goals, and outline action items that will lead to goal attainment. The CEPT application is available to Title I, Title III, OVES, and TAA staff and allows for future expansion to other core and partner programs. CEPT was recently integrated into ASSET, the reporting system of record, so it is no longer a stand-alone application and additional IT enhancements to CEPT are planned or underway to enhance the usability for staff.

Additional examples of modernization in the delivery of career services include new chat features on jobcenterofwisconsin.com, Wisconsin's public labor exchange. Mattie Moo is a chatbot that allows job seekers to click and receive answers to many commonly asked questions asked by customers. Mattie Moo is able to direct customers to the right location or resource without needing to contact staff for assistance. The site also offers a live chat solution to virtually connect customers on jobseeker-focused pages of jobcenterofwisconsin.com to a Title III staff person who can assist them. Customers are prompted to provide basic information before connecting with Title III staff, who can provide a follow along experience on the website to provide in-time assistance to customers. Live chat is available during regular business hours, while Mattie Moo is available 24/7. These two solutions complement each other and enhance the user experience of the public labor exchange.

DWD has also created a new tool to help job seekers navigate career advancement in a variety of career pathways. Job seekers can search for career advancement opportunities by searching for trainings, apprenticeships, and jobs by occupation, wage, and education level in 16 career clusters on the [Wisconsin Career Pathways webpage](#). A link to this information can be found on the [Job Center of Wisconsin Directory of Workforce Services webpage](#) under the heading "Career Planning."

Training Services: Under WIOA, there is an emphasis on work-based learning, stackable credentials, and career pathways. All core programs participate in training services to the extent allowed by federal law and regulations. Title I supports education and training for adults, dislocated workers, and youth. Title II supports a diverse population of adult learners with basic skill 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 with the public workforce system and serves 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.

For the Title I Adult and Dislocated Worker programs, Individual Training Accounts (ITAs) are the primary method for funding participant training services. The Title I Youth program also uses ITAs to fund training services for out-of-school youth. The Employment and Training Administration (ETA) approved the state's request to waive the requirement limiting ITAs to only out-of-school-youth, ages 16-24 through the end of PY2023. In addition to out-of-school-youth, the state may use ITAs for in-school-youth (ISY) ages 16-21. 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.

Through the Title I programs, the local WDBs provide work-based learning, 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 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 (BSTs) coordinate activities and resources with WIOA core and combined state plan programs to provide comprehensive, high-quality, customer-centered services to employers. The core and combined state plan partners meet regularly 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, tailored labor market information, access to the labor pool, and access to resources and training. Membership on each BST include a representative of the local WDBs, Title III, Title IV, Registered Apprenticeship, Office of Veterans' Employment Services (OVES), and other WIOA partner programs. Some local area BSTs also include TANF and FoodShare Employment and Training (FSET) representatives.

Title IV has 12 Business Service Consultants (BSCs) and one business services program manager 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.

B. The Strengths and Weaknesses of Workforce Development Activities

Strengths

Relationships: One result of required collaboration set forth in WIOA is the strengthening of relationships between partner program leaders at the state level. The implementation of the WIOA Executive Committee, comprised of cabinet secretaries from the Department of Workforce Development, Wisconsin Technical College System, Department of Health Services, Department of Children and Families, and Department of Corrections, as well as the WIOA Management Committee, comprised of division administrators from the partner programs, has formalized a relational structure to work together. There is far more strategic and tactical collaboration between partner programs now than there was several years ago. There are also strong relationships between partner programs at the local level, although the strength of the individual relationships varies depending on the area.

Education System: The state technical colleges have existed for more than 100 years. These 16 institutions offer a variety of programming such as industry recognized credentials, GED and HSED programming, adult education, K-12 and English language learning courses, continuing education programming, contract training with business and industry, correctional education, and high school dual enrollment. The 16 technical colleges operate through a responsive framework that centers district employer and community needs, and the needs of their current and prospective students. Each of the state technical colleges are equipped with state-of-the-art technology, equipment, large physical spaces, and employ specialty trained faculty.

This infrastructure, coupled with hundreds of technical college credentials and thousands of technical college courses offered across the state, provides a breadth and depth of programming for the over 250,000 people who enroll at a technical college each year, of which roughly 100,000 are credential-seeking students. The Wisconsin Technical College System (WTCS) has seen tremendous success in expanded career pathways, increased education and training opportunities, and increased performance in Adult Education and Family Literacy (AEFLA). Wisconsin AEFLA performance exceeded the nation across federal WIOA primary indicators of performance with a rate of 53.48% measurable skill gain.

Title II Federal WIOA Indicators of Performance, Wisconsin VS Nation (FY 2022)

Outcome	WI	Nation	Difference
Measurable Skill Gain Rate	53%	41%	+12%
2 nd Quarter Employment after Exit	53%	35%	+18%
4 th Quarter Employment after Exit	44%	31%	+13%
Median Earnings 2 nd Quarter after Exit	\$6,111	\$5,564	+10%
Credential Attainment Rate	62%	21%	+41%

The annual WTCS Graduate Outcome Report for 2022 indicated strong outcomes for WTCS graduates. Of the 14,112 students who responded to the survey, 8,404 were in the workforce. Additionally, 80% of those in the labor force 80% were in a job related to their training. Further, 91% of those who responded reported they stayed within Wisconsin. Of those graduates who were not in the labor force, 91% reported continuing education as the primary reason.

Alignment with Economic Development: The WTCS mission is to deliver skills and training that recognize and respond 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: Approximately 20% 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 a Memorandum of Understanding (MOU) with the Department of Public Instruction regarding transition braiding of funding and services.

Additionally, each of the 16 Wisconsin technical colleges coordinate dual enrollment with area high schools each year. This collaboration resulted in 57,219 high school students earning dual enrollment credit in the 2022 academic year. Dual enrollment offerings are cost neutral to students and accessible through open access eligibility requirements. The system estimates that a collective \$36.8 million in college credit savings was realized from the 256,985 technical college system credits awarded through dual enrollment during the 2022 academic year. In addition, over 2,000 WTCS credentials were awarded to Wisconsin high school students prior to graduation during the 2022 academic year.

Weaknesses

Employer Awareness of Programming: The strategies presented in this WIOA State Plan were developed to face the current economic conditions of the state and address the significant challenges expressed by Wisconsin employers. These challenges were identified not only by the expertise of the business representatives on the Governor's Council on Workforce Investment (CWI) but reinforced through business climate surveys conducted by the CWI in collaboration with the Department of Workforce Development (DWD) and the University of Wisconsin – Oshkosh.

Among the questions in the survey, businesses were asked what they felt were their most significant resource constraints over the past year, what are their most immediate/pressing needs for their business to succeed, and what they anticipate being their largest resource constraint over the next three years. The results indicated that – regardless of past, present, or future – the most significant needs cited by employers were access not only to skilled workers but available workers in general. These responses reaffirm that the demand for workers pre-dates the pandemic and is a continued need to be addressed moving forward.

The survey also measured awareness among the employer community on a wide variety of workforce development services offered by DWD and other partner programs. The raw data reflected a general lack of awareness by employers of the workforce and education programs that the state offers to assist with worker recruitment, retention, and training needs. Follow-up questions related to employers' likelihood to utilize the such programs indicated the respondents were more confident in their ability to hire individuals from populations with which they had previous experience, showing a correlation between lack of awareness of targeted programs and hesitancy to utilize available workers from underutilized populations (e.g., justice-involved individuals, individuals with disabilities, etc.).

The survey results also indicated a lack of access to childcare and affordable healthcare as the two most common policy and services concerns cited by respondents. However, several other issues ranging from transportation to substance misuse and the presence of a criminal record were also frequently noted. While some of these issues may present bigger challenges than others, they need to be approached holistically to address the underlying causes and develop a workforce system that is sustainable and connects the dots to provide opportunities for everyone to move the state forward.

Training Inequity: Students facing multiple barriers such as race, income, and parental status often have a more challenging time completing a degree. The WTCS 2021 System Equity Report utilized data to demonstrate time to completion. Cohort students in 2013-2015 in welding were examined on their six-year completion rates. Data showed that program completion is considerably lower for students who face multiple barriers. Of those cohort students, only 16% of Black students and 33% of Hispanic students living in poverty completed their welding diploma compared to 55% of White students living in poverty. Further, data shows that these equity gaps begin much earlier. According to the Wisconsin Department of Public Instruction, 7,240 students in Wisconsin graduated from high school having participated in a sequence of two or more manufacturing courses (CTE Concentrator) during the 2022-23 school year. Out of these students, 84.5% were White while only 2.6% were Black and 7.9% were Hispanic.

Common Language: The public workforce system is fragmented and lacks a consistent language and brand to communicate its services to both jobseekers and employers. Some partners use different definitions for terms, despite cross-partner work to have commonalities. These cross-partner efforts to create common language will continue, since the work is not finished. Additionally, the statewide system lacks a unified front to explain to the public what is available to them. The WIOA Branding Initiative will re-brand the one-stop job center system statewide and assist with creating a unified public face to a complex system.

Professional Development: Workforce system staff would benefit from increased knowledge of partner programs. There is not a comprehensive onboarding for one-stop system employees. This would increase knowledge of partner programs and create a more inclusive system. DWD will consider creating a new staff position to focus on training and professional development of one-stop system employees. In 2023, DWD also revived the in-person WIOA Roundtable, a staff professional development conference focused on cross-partner education and best practices in service delivery. This event was postponed for a few years during the pandemic but was revived with great success.

Sharing Programmatic and Performance Information: While aggregated performance data is shared between partners, individual level data is not systematically being shared across programs. There are varying levels of programmatic information sharing throughout Wisconsin's workforce development system. Wisconsin's WIOA leadership and potentially the CWI are positioned to spearhead these issues through joint directives with clearly defined objectives and scope.

Innovation: Generally, Wisconsin's WIOA system continues to do things the way they have done in the past, which is inconsistent with the *Yes, WIOA Can!* initiative. There are certainly exceptions to this statement and the state has implemented specific technological innovations and evolved methods of service delivery, particularly in response to the pandemic. However, the pandemic disrupted Wisconsin's capacity to focus on innovation more broadly within WIOA programs. Through other federal grant funding opportunities, WIOA partner agencies have implemented innovative programs and processes. Wisconsin should apply the lessons learned from these pilot projects and integrate them into its WIOA programming. The state should also continue to adapt to new trends, including individuals working remotely, the increase in mental health challenges, and the rise of Artificial Intelligence (AI). The state must also be intentional about understanding the needs and desires of youth who are preparing to enter the workforce or are already disconnected from education and the workforce.

DWD is currently exploring the impact of AI on "hot jobs" in Wisconsin, and more specifically, on the jobs held within key business sectors prevalent throughout the state. This review was presented to a task force of subject matter experts who will ultimately provide recommendations for navigating the predicted changes that lie ahead. To expand on this effort, Gov. Evers signed Executive Order #211 in August 2023 creating the Governor's Task Force on Workforce and Artificial Intelligence. This task force is in the process of gathering and analyzing information as an initial step for producing an advisory action plan to identify the current state of generative AI's impact on Wisconsin's labor market and develop informed predictions regarding its implications for the near term and future. A component of the action plan is identifying how these workforce impacts may affect Wisconsin's key industries, occupations, and foundational skillsets, explore initiatives to advance equity and economic opportunity in the face of these changes, and based on the impacts identified, recommend solutions related to workforce development and educational systems.

C. The State's Workforce Development Capacity

DWD is Wisconsin's state workforce agency that encompasses five of the state's six WIOA core programs including: Title I Adult, Dislocated Worker, and Youth Programs; Title III Wagner-Peyser Employment Services Program; and the Title IV Vocational Rehabilitation Program. Having five of Wisconsin's six core programs housed in a single agency allows 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 are required by state policy to conduct customers service surveys to ensure they are continuously improving the quality of their services.

Adult Basic Education (ABE) and English language services are the responsibility of the Wisconsin Technical College System (WTCS) and its 16 colleges across the state. 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 WTCS 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. Additionally, many community-based organizations, 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.

WIOA Title IV, overseen and operated by the DWD Division of Vocational Rehabilitation (DVR), supports a "dual-customer" approach to service delivery, serving both individuals 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 support, and customized services geared toward meeting business needs. DVR Business Services consultants participate on local Business Services Teams to effectively understand the local business demands and build dynamic relationships. DVR staff receives training and information on in-demand occupation and labor market information which are considered when developing individualized plans with consumers. DVR and Wisconsin Works (W-2), the state's TANF program, have a Memorandum of Understanding (MOU) and Technical Assistance Guide to ensure that individuals with disabilities co-enrolled in these programs have coordinated case management, shared employment goals, and overall service coordination.

The Office of Veteran Employment Services (OVES) in DWD is funded by the Jobs for Veterans State Grant (JVSG). One JVSG Director/State Coordinator and two JVSG-funded supervisors are stationed within two regions of the state and provide ongoing supervision of Local Veterans Employment Representatives (LVERs) and Disabled Veterans Outreach Program (DVOP) staff. All DVOP or LVER staff are integrated within job centers throughout the state. OVES management ensure that all LVER and DVOP staff possess knowledge of requirements specified by U.S.C. Chapter 31 requirements and guidance provided through DOL Veteran Program letters.

LVERs are fully integrated within the local Business Services Teams (BSTs) 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 to employment (SBE). A triage approach is used to identify veteran status and/or status of veterans with an SBE. The approach includes an online questionnaire that occurs during the Job Center of Wisconsin registration process; or, a paper triage form containing all the questions used to determine veteran status and eligibility for DVOP service is available at intake for self-identification for those individuals that do not use the computer registration. Veterans who are determined to have an SBE are referred to DVOP staff or other career planners within the job centers. In addition to providing individualized career services to SBE veterans, DVOPs conduct outreach to find SBE veterans not utilizing job center services. As part of a MOU with the Veterans Administration (VA) and DOL, DVOPs provide individualized career services and follow-up services for disabled veterans enrolled in the Veterans Administration Chapter 31 rehabilitation program. DVOPs visit correctional facilities and provide individualized career services for veterans scheduled for release.

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. Specifically, regional economists regularly work with local WDBs and other stakeholders to provide data and analysis on sector strategies, program planning, and evaluation. BWITS recently updated its 72 county profiles, for which it received the Community, Economic, and Workforce Research 2022 Award for Best Regional Resilience from the Council for Community and Economic Research. BWITS is also responsible for developing 10-year projections of statewide and regional occupational employment and wages, job vacancies, and employment trends.

DWD has strategically utilized non-WIOA funding sources to augment its capacity to deliver a variety of workforce-related solutions. For example, DWD has received Workforce Data Quality Initiative funding which is being used to create and augment a Longitudinal Workforce Database. This database will house data across a longer period of time with a greater number of programs, which will increase the state's capacity to evaluate demographic issues and workforce partner programs. DWD is also utilizing American Rescue Plan Act (ARPA) dollars to upgrade jobcenterofwisconsin.com, the state's online labor exchange, and ASSET, the case management system of record for Title I, Title III, TAA, and JVSG programs.

DWD also used ARPA money to implement a variety of workforce solutions that amplify the existing public workforce system. ARPA funds are being used to hire additional Title III staff for job centers and outreach locations, create new job labs in community corrections (probation and parole) facilities and correctional institutions to increase access to WIOA services upon release, and procure new mini-mobile job labs. ARPA funds are also being used to increase the capacity of the BWITS staff to create labor supply and demand projections, assist Youth Apprenticeship with launching new program areas, and work on population modeling efforts.

DWD also launched several new workforce programs through Gov. Tony Evers' Workforce Solutions Initiative, which was a strategic investment of over \$158 million in ARPA funds. The local WDBs received Worker Advancement Initiative subawards to serve individuals whose jobs have not come back since the pandemic, as well as those who were not attached to or were not successful in the labor market prior to the pandemic, by offering subsidized employment and skills training opportunities with local employers. Additionally, DWD's Division of Employment and Training is currently operating the Worker Connection Program, which provides free career navigation services to expand career opportunities in WDAs 2 and 5 by connecting individuals to resources, trainings, and in-demand career paths in those areas. Finally, the Workforce Innovation Grants program awarded funds to a variety of organizations to design and implement innovative plans to tackle their region's most pressing workforce challenges that arose during or were exacerbated by the pandemic. All of these ARPA-funded initiatives are currently underway and will enhance the public workforce system's capacity to provide solutions to individuals and businesses that can be used to inform and enhance existing WIOA programs.

B. STATE STRATEGIC VISION AND GOALS

1. VISION

Wisconsin's workforce development system will advance the competitiveness of workers, job seekers, and employers in the global economy by improving equity, economic opportunity, and sustainability.

2. GOALS

In 2021, Wisconsin's state workforce board, referred to as the Governor's Council on Workforce Investment (CWI), initiated the process for developing a four-year strategic plan. The CWI directed a business climate survey, engaged with the National Governor's Association to share best practices of innovative state workforce boards, and held a two-day strategic planning retreat. The outcome of these efforts is the CWI's 2022-2026 Strategic Plan, which includes the following goals that are being adopted as Wisconsin's WIOA State Plan. These goals reflect the opportunities available through the state's workforce development activities and its current and projected economic and workforce conditions. These goals will allow state government, job seekers, workers, and employers respond to demographic challenges, technological advancements, and targeted federal infrastructure investments and successfully develop the workforce and meet employer needs to support economic growth and economic self-sufficiency.

Goal #1 Education Focus: *Reinvigorate Wisconsin's culture and value of education and innovation to fuel ideas, businesses, people, and the next generation for future economic well-being and ensure that individuals from all backgrounds have access to the education, training, and support they need to achieve their full potential.*

Recognizing the importance of early childhood education and its impact on the state's economy and workforce, Wisconsin aims to ensure that all Wisconsin families will have access to high-quality, affordable, local early care and educational opportunities by supporting the development of Wisconsin's Early Childhood Education (ECE) system by focusing on areas of ECE workforce, access, affordability, and education in the state. In February 2022, the Wisconsin Department of Children and Families (DCF) directed \$194 million in ARPA funds towards early care and education. In total, the Evers Administration has directed \$824 million in federal funding to ECE in Wisconsin. These investments helped stabilize the industry, reducing the number of closures licensed childcare providers have faced in the last two years. Gov. Evers and Wisconsin are looking to continue supporting investments in the state's ECE system by providing additional funding for the Child Care Counts Program that to date has helped more than 4,300 child care providers keep their doors open, ensuring the employment of 22,000 child care professionals and allowing providers to continue to provide high-quality care to more than 113,000 kids; and the Partner Up! Program, which has helped support employers in purchasing child care spots for their employees at existing regulated child care providers across the state. In October 2023, Gov. Evers directed an additional \$170 million in funding from the Federal Emergency Management Agency to DCF to continue the Child Care Counts Program at current levels through June 2025. Funding for the program was set to expire in January 2024 under federal allocations.

Wisconsin also plans to strengthen career pathways and career exploration opportunities while students are in K-12 and provide all students the opportunity to participate in dual enrollment, earn a certificate/credential, or participate in work-based learning prior to high school graduation with emphasis on credentials where dual secondary and post-secondary academic credit is awarded.

In addition to enhancing career pathways opportunities for youth, the state intends to expand opportunities for adults from all populations to earn a certificate / credential, participate in work-based learning, including pre-apprenticeship, Youth Apprenticeship and Registered Apprenticeship, and access other career pathway possibilities that allow fair and equitable access to meaningful, family-sustaining employment. To encourage startups and the development of small businesses in local communities, Wisconsin is looking to enhance entrepreneurship and entrepreneurship education by providing additional resources, tools and trainings to encourage and support those interested in becoming entrepreneurs. For example, the Wisconsin Department of Administration recently awarded the Ashland Area Development Corporation a Diverse Business Assistance Grant totaling over \$1.8 million to provide training and funding to entrepreneurs from Ashland County's diverse communities which have historically faced barriers to accessing financing to launch businesses.

Goal #2 Employers Focus: *Engage all employers to drive, build, and utilize Wisconsin's Workforce Development Systems.*

Wisconsin's state workforce board, the Governor's Council on Workforce Investment (CWI), conducted a business climate survey centered on gathering information about the needs and constraints facing Wisconsin businesses, as well as to gather employers' input on potential recommendations for solutions to those challenges. The results and recommendations from the survey were used to establish methods to help meet the skilled workforce needs of employer in the state, such as:

- Increasing the number of employers that offer work-based learning experiences and lifelong training for all youth and adults.
- Supporting employers' efforts to attract, hire and retain employees from all populations.
- Expanding opportunities for employers to provide input regarding their current and future workforce needs and requirements to the workforce development system.
- Improving employer awareness and utilization of the workforce development system.

Goal #3 Workforce Focus: *Increase Wisconsin's workforce participation by promoting infrastructure to improve access to job opportunities, incentivize workforce participation, and by improving the sustainability of work for individuals and families.*

The Workforce Innovation and Opportunity Act (WIOA) emphasizes preparing a skilled and educated workforce, including individuals with barriers to employment and historically underrepresented/under-resourced individuals. Each of the main goals for this plan will be implemented with these populations in mind, and one goal specifically focuses not only on further developing the state's workforce overall but doing so in a targeted effort to enhance diversity, equity, and inclusion throughout the state; as well as incorporate approaches to engage under-represented or under-utilized populations.

Wisconsin is building on the strategies and programs for employers to attract and retain diverse talent/workforce, the targeted strategies that increase the number of individuals who are work- and career-ready, and the policies that promote the resilience of incumbent workers. These efforts include supporting the resilience of workers through increased availability of childcare by promoting business investment in early care and education statewide. The [Birth-to-5 Statewide Strategic Plan](#) that was developed through coordination by DCF and the Department of Public Instruction promotes innovative early care and education ideas that employers can use to help their employees access high-quality, affordable, local early care and educational opportunities.

Further, Wisconsin will strengthen collaboration and support equity and inclusion through the coordination of programs among public and private entities to help historically under-represented and under-resourced individuals and families overcome barriers to employment. As part of this effort, Wisconsin intends to coordinate programs serving specific populations across the WIOA partners to promote workforce participation, as well as incentivize workforce participation for individuals currently receiving public benefits in order to support their transition to sustainable employment.

Goal #4 Organization and Resource Alignment Focus: *Advocate for resource alignment to maximize return on investment and use data for continuous improvement of the workforce system.*

The fourth main goal in the plan touches on all other aspects of the plan and encourages coordination, collaboration, and accountability of WIOA core and Combined State Plan partners to ensure alignment of efforts and maximize resources to improve the delivery of the workforce system for all. To achieve this goal, Wisconsin's WIOA partners will:

- Identify and address the organizational and structural changes necessary to improve collaboration and accountability.
- Continue developing a longitudinal data system and identify opportunity for collaboration and expand capacity to support evidence-based decision making.
- Define and create an effective state and local partner communication strategy to increase awareness of workforce services.
- Build a stronger, more coordinated relationship between state and local workforce partners.

3. PERFORMANCE GOALS

Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

Consistent with WIOA Sec. 116(b)(3), the expected levels of performance for PY2024 and PY2025 were determined using historical performance results. The state programs considered how the levels compared with the national performance results, differences in economic conditions, characteristics of participants served, the extent which the levels promote continuous improvement, and the extent to which the levels involved will assist the state in meeting the goals established by the Secretaries of Labor and Education in accordance with the Government Performance Results Act of 1993. The expected levels of performance are made available for public comment prior to submission to the U.S. Department of Labor or Education. Submission to the federal agencies will be made in accordance with forthcoming federal joint negotiation guidance. States must establish negotiated levels of performance before the beginning of PY2024.

See Appendix 1.

4. ASSESSMENT

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment, which may include evaluation findings, and other feedback to make continuous or quality improvements.

Wisconsin's core WIOA programs will use the WIOA Primary Indicators of Performance to assess its overall effectiveness in connecting job seekers with measurable skills gains, credentials, employment, and higher wages. Core and partner programs will assess annual 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 quarterly analysis to determine root causes for strong and weak performance. WIOA performance analysis and results are reviewed at CWI meetings and during WIOA performance trainings.

In addition, Wisconsin is developing state plan metrics for both the WIOA State Plan and the CWI strategic plan. The goal of the state plan metrics is to assess performance and trends. The state plan metrics will include participant counts by demographics in WIOA programs and partner programs, as well as co-enrollment across programs. In addition, these metrics include demographics of labor force participation rates, and participation and outcomes in work-based learning opportunities, including entrepreneurship, apprenticeships, internships, veteran employment programs, on the job trainings, employer training in Wisconsin Fast Forward, transitional jobs, and participation in the Work Opportunity Tax Credits (WOTC). Further, the state metrics track workforce strategies in TANF, SNAP, reentry, as well as strategies focused on veterans and individuals with disabilities. State metrics also track workforce strategies in diversity, equity, inclusion (DEI), customer service, cultural competency, access to childcare, transportation, and housing. Training is also tracked through state metrics with a focus on manufacturing training, industry-validated technical skills attainment, percent population with a postsecondary credential, career pathways, and WorkAdvance (or similar) training. Finally, state metrics track quality of employment outcomes through metrics of good jobs, work advancement, and economic self-sufficiency.

While metrics are helpful in tracking progress, metrics provide limited information on the factors that influence employment outcomes. For this reason, in addition to performance metrics, WIOA programs utilize foundational fact finding, policy analysis and evaluation for evidence-based decision-making. The Wisconsin Department of Workforce Development (DWD) learning agenda and evidence plan (both available at: <https://dwd.wisconsin.gov/wdis/products.htm>) help drive WIOA program evidence activities. Evidence activities are implemented within core programs, through interagency research and evaluation collaboration as part of the DWD's Workforce Data Integration System (WDIS), and through partnership with external researchers through the University of Wisconsin (UW) and other external research entities. These evidence activities focus on continuous improvement, consumer feedback, and an improved understanding on the influence of participant characteristics, employer characteristics, local economic conditions, and career and training services have on training and employment outcomes. DWD's current learning agenda focuses on understanding how best to improve employment service and training outcomes, using labor market information to promote sector-based learning, improving customer service and services alignment, and diversity, equity, and inclusion.

Evaluation activities focus on how to improve evidence-based service delivery, including improving targeted outreach, especially for out-of-school youth, improving service engagement through identifying positive profiles, conditions of work, and improving career, training, and supportive service navigation, better connecting job seekers and employers to effective services, with a focus on training that leads to good jobs and work advancement opportunities. Other evaluation activities focus on how to better support job seekers affected by substance misuse, better use of career pathways to promote career

advancement, and use of approved waivers to better serve in school and out of school youth. An important part of the evaluation process is to share findings with programs and partners, including the local Workforce Development Boards (WDBs). Findings of results will be shared online at the WDIS webpage: <https://dwd.wisconsin.gov/wdis/>. Further, DWD's evidence plan provides a dissemination plan for each evidence activity. Evidence is then used to make policy decisions, inform staff training, and improve service delivery and partnerships.

C. STATE STRATEGY

As noted in section II(b)(2), the Council on Workforce Investment's 2022-26 Strategic Plan sets forth Wisconsin's goals related to education, employers, workforce, and organization and resource alignment. That strategic plan also outlines strategies to achieve those goals, and those are included in this section as appropriate.

1. *Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D).*

Building on the success of Wisconsin's existing career pathways programming, Wisconsin will continue to focus on ensuring all students in all school districts have equal access to high quality career readiness programs and services beginning in elementary grades so that they graduate ready for success in their careers, postsecondary education, and community. 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.

Career pathways are developed and supported by Wisconsin's K-12 public school districts. Wisconsin's K-12 system has identified common barriers across school districts that are limiting participation in career pathways programs and is developing recommendations to address the identified barriers – including strategies and incentives that will encourage more employers to provide career-based and/or work-based learning experiences related to Regional Career Pathways (RCP) for high-demand industries and occupations. Wisconsin intends to use the identified strategies to:

- Coordinate with employers to increase the number of individuals participating in employer-offered work-based learning experiences and lifelong training for all youth and adults.
- Expand career pathways – with a focus on equity – to increase the number of students in a career pathway and ensure that every student has access to those pathways based on the RCP model.
- Promote the benefits of dual enrollment to Wisconsin families and employers, working towards equitable access and increased opportunities for currently underrepresented populations.
- Advocate for policy changes that focus on expanding the number of economically disadvantaged students who could access dual enrollment courses and adjust dual enrollment application dates.
- Increase awareness of career pathways and work-based learning among students, adults, parents, educators, guidance counselors, career counselors, American Job Center staff, supportive services program staff, and employers through Regional Career Pathway Coordinators and collaborative partners.
- Implement a statewide expansion of career readiness efforts that are aligned with post-secondary industry needs and rooted in the Academic Career Planning (ACP) process based on the results of a career readiness practices survey and series of focus groups with current high school students

and recent high school graduates conducted in 2022 and on a statewide K-12 career readiness practices asset map created in early 2024.

2. *Describe the strategies the State will use to 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 to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2).*

Wisconsin recognizes the need to continue to increase collaboration and program alignment between the core and Combined State Plan program partners. For that reason, the state workforce board (i.e., the Council on Workforce Investment) has established multiple objectives related to collaboration as well as organization and resource alignment.

Targeted Efforts to Prioritize Diversity, Equity, and Inclusion to Meet the Needs of Customers from All Populations.

Governor Evers' Executive Order #59 "Relating to Diversity, Equity, and Inclusion in State Government" states "we must intentionally address and dismantle individual and systemic racism, discrimination, and bias through thoughtful and ongoing implementation of culturally responsive and equitable policies and practices." To execute this order and address the training inequity weaknesses identified in section II(a)2, Wisconsin state agencies and WIOA partners intend to strengthen collaboration and support equity and inclusion by coordinating programs among public and private entities that can help historically under-represented/under-resourced individuals and families overcome barriers to employment.

To accomplish this undertaking, Core and Combined State Plan partners will work to coordinate programs serving specific populations across state agencies to promote workforce participation. The agencies in charge of the core and non-core programs in the Combined State Plan will review their existing policies from a DEI perspective to identify any shortcomings or potential enhancements necessary to make the policies more equitable. Those partners will also collaborate with the Governor's Council on Equity and Inclusion on additional strategies to work with employers and businesses to increase the amount of minority contracts with the state. Part of this effort will be to develop a common understanding of the unique experiences of each priority population (e.g., individuals with disabilities, justice-involved individuals, foster care, substance misuse issues, etc.) in relation to their distinct backgrounds and then proceeding to educate employers, state agencies, etc. on that common understanding to give a better understanding of the unique experience of each population. The state will use what is learned through the policy review process and the strategies identified with the Council on Equity and Inclusion to develop a catalogue of resources and tools that will be available for businesses to help increase DEI competencies statewide. Ultimately, Wisconsin will successfully align efforts common across state agencies equity and inclusion action plans (created under the direction of Governor Evers' Executive Order #59) to make practices more efficient and consistent across state government.

Increased Collaboration and Program Alignment

Wisconsin intends to identify and address the organizational and structural changes necessary for the state's WIOA system to improve collaboration and accountability. Core and Combined State Plan partners

will evaluate existing partnerships and collaborations in the workforce system to discover where there are gaps as well as opportunities for additional collaborations (i.e., determine where there needs to be collaboration where there currently is none and decide what additional collaboration is needed and how it needs to be done). This evaluation will include developing key performance indicators and collecting baseline data on customer satisfaction/outcomes for related accountability measures. It will also involve continued development of a common intake and referral system between WIOA partner programs (where possible and appropriate) and developing a standard operating procedure for how referrals are processed and tracked across programs.

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.

As indicated in the weaknesses described in section II(a)(2), workforce system staff would benefit from increased knowledge of partner programs. The results of the business climate survey conducted by the Council on Workforce Investment (CWI) reveal the employer community would also benefit from increased knowledge of WIOA partner programs. An objective of the core and Combined State Plan program partners to address this weakness is to create an effective state and local partner communication strategy to increase awareness of workforce services among staff and employers. A preliminary step in developing the communication strategy will focus on identifying target audiences for different services and establishing appropriate communications methods based on the audience type (e.g., employers, educators, job seekers, etc.). Further, the standing committees of the CWI will be engaged in coordinating the communication strategy to ensure the messaging is aligned but appropriately tailored to match each committee's focus area with respect to employers, education, or workforce.

Sharing programmatic and performance information is a challenge in Wisconsin's workforce development system, which is why the state is taking action to enhance communication and build stronger, more coordinated relationships between state and local workforce partners. The CWI intends to address the issues related to the sharing of information across programs by developing additional strategies on how to consistently collaborate and share information among stakeholders. Members of the CWI are taking actions to develop communications that explain how to collaborate and inform stakeholders about the WIOA programs. To accomplish this, the CWI members will determine how to purposefully share information with a program point of contact that can effectively and efficiently distribute it throughout their network. They will also use their influence to access statewide organizations and local chambers across the state to distribute the messages.

The CWI is also examining methods to maintain strong collaborations and shared accountability for performance between traditional WIOA partners as well as improve collaboration with additional partners. Examples of short-term methods the CWI will take to enhance these collaborations are:

- Inviting new or potential partners from relevant stakeholder groups to participate in the CWI meetings to encourage the regular sharing of information,
- Identifying best practices for integrated service delivery across the state and local workforce development areas,
- Capturing examples of innovative collaborations worth highlighting and then sharing the best practices, and
- Incorporating those examples and best practices into the long-term communication strategy.

The CWI standing committee dedicated to WIOA compliance and resource alignment will serve as a resource to help showcase the benefits and successful outcomes from stronger, coordinated relationships. Following the development of the communication and collaboration strategies, the CWI will formalize the best practices for collaboration – such as tools for developing policies, MOUs, and effective procedures that can be easily replicated – and promote those best practices statewide. Once the best practices have been distributed statewide, the CWI will measure how successfully the practices were implemented and the outcomes to determine if those methods can be continuously utilized statewide and whether different practices are more effective for different regions of the state.

III. OPERATIONAL PLANNING ELEMENTS

A. STATE STRATEGY IMPLEMENTATION

1. STATE BOARD FUNCTIONS

State Board Functions. Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision-making processes to ensure such functions are carried out).

The Governor's Council on Workforce Investment (CWI) is the federally mandated state entity under WIOA that assists the Governor in developing innovative and dynamic approaches to further develop Wisconsin's workforce. The CWI is tasked with aligning Wisconsin's workforce and talent development initiatives and investments with its economic development strategies. In assisting the Governor and Legislature in carrying out their federally mandated responsibilities, the Council aids Wisconsin employers in finding the workers they need and provides resources to enable workers to access training for in-demand careers with the goal of moving Wisconsin's economy forward. The CWI was most recently reconstituted in its current form through 2023 Wisconsin Executive Order #182.

In 2021, the CWI initiated the process for developing its next four-year strategic plan that would include evidence-based, workforce development strategies with measurable goals and objectives to help meet the needs of employers and workers. The Council took several proactive steps to ensure its newly developed strategic plan would be as strong as possible and bring about a positive impact throughout Wisconsin. The CWI enlisted the expertise of staff from the National Governors' Association to share best practices of innovative state workforce boards, offer federal-level insight, and help facilitate the discussion among CWI members to support the making of a high-performing strategic plan. The Council and DWD also collaborated with the University of Wisconsin – Oshkosh to conduct a business climate survey that was distributed to over 60,000 Wisconsin employers to gather information about the needs and constraints facing Wisconsin businesses, as well as employers' input on potential recommendations for solutions to those issues. These efforts culminated in a two-day strategic planning retreat where members of the CWI were joined by various program experts and key stakeholders to establish specific objectives and action items to advance the priorities of the strategic plan.

The 2022 – 2026 CWI Strategic Plan outlines the key priorities and recommendations of the Council for outcome-based, workforce development strategies that are data-driven and reflective of employer

demands. The CWI intended for this plan to lay the foundation for continuing enhancements that will benefit Wisconsin businesses and workers.

With the support of Governor Evers, the CWI maintains its 2022 – 2026 Strategic Plan as a living document for use in continuing to shape and advance Wisconsin's workforce policies, strategies, and desired outcomes. Review and updates to the plan are a standing agenda item at Council meetings throughout the course of the plan; and the recommendations may evolve over the years to ensure they reflect input from key stakeholders and incorporate new strategies to meet the state's ever-changing workforce and economic development landscape.

Council, Committee Structure and Responsibilities

The Governor appoints members of the Council in accordance with the requirements enumerated in 20 CFR § 679.110(b)(3) of WIOA, which includes representatives of business, local and state government, education, labor, and community-based organizations across the state. Members serve three-year terms at the pleasure of the Governor and assist the Department of Workforce Development 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 of all backgrounds to pursue and retain good paying careers.

The Council is currently comprised of an Executive Committee and three standing committees which provide a formalized structure for workforce members and stakeholders to actively participate in the maintenance, support, and refinement of the system's activities. Each of the focus areas of the 2022 – 2026 CWI Strategic Plan have been assigned to one of the CWI standing committees that are positioned to advance the objectives and achieve the strategic goals. The committees meet regularly between the quarterly CWI meetings and the chairs of the standing committees report to the full Council at each quarterly meeting their activities and progress in achieving their goals.

Education Committee: The CWI Education Committee is responsible for Focus Area #1 – Education in the 2022 -2026 CWI Strategic Plan with the goal to reinvigorate Wisconsin's culture and value of education and innovation to fuel ideas, businesses, people, and the next generation for future economic well-being and ensure that individuals from all backgrounds have access to the education, training, and support they need to achieve their full potential. As part of their goal, this committee focuses on initiatives related to career pathways, early childhood education, and entrepreneurship.

Employer Committee: The CWI Employer Committee is responsible for Focus Area #2 – Employers in the 2022 – 2026 CWI Strategic Plan with the goal to engage all employers to drive, build, and utilize Wisconsin's workforce development system. To advance this goal, the committee's efforts are centered around work-based learning and employer engagement with the workforce system.

Workforce Committee: This committee is responsible for Focus Area #3 – Workforce in the 2022 – 2026 CWI Strategic Plan with the goal to increase Wisconsin's workforce participation by promoting infrastructure to improve access to job opportunities, incentivize workforce participation, and by improving sustainability of work for individuals and families.

To increase efficiencies, transparency, and alignment between the CWI and WIOA program partners, the CWI is in the process of incorporating the WIOA Executive Committee into the CWI committee structure as described below.

WIOA Compliance and Resource Alignment Committee: The CWI WIOA Compliance and Resource Alignment Committee is specifically tasked with assisting the Governor in carrying out his federally mandated WIOA responsibilities while ensuring ongoing alignment of resources across sectors. In addition to ensuring compliance with federal requirements, this committee will also oversee Focus Area #4 – Organization and Resource Alignment in the 2022 – 2026 CWI Strategic Plan with the goal to advocate for resource alignment to maximize return on investment and use data for continuous improvement of the workforce system.

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 the CWI bylaws 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.

Federal Infrastructure Implementation and Coordination Workgroup: The CWI is evaluating the possibility of establishing a new workgroup to explore opportunities to positively impact education and workforce development services by taking full advantage of the historic investments made possible through the Bipartisan Infrastructure Law (BIL), the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA) in alignment with state funding and resources to assist workers in accessing good jobs and help businesses find the workers they need. The workgroup would convene staff and program experts from the various state agencies tasked with overseeing and implementing the initiatives funded by the federal infrastructure investments and additional key stakeholders from K-12, career and technical education, economic development, transportation, apprenticeship, etc. to establish new partnerships and align resources, programs, and labor market needs, to coordinate the state workforce development system's role in implementing these initiatives in a holistic and demand-driven approach.

2. IMPLEMENTATION OF STATE STRATEGY

A. Core Program Activities to Implement the State's Strategy

Core Program Activities to Implement the State's Strategy. Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

The CWI has made it a priority to ensure their efforts across agencies and in partnership with all workforce stakeholders – including private employers – result in the breaking down of employment barriers, building of career pathways, and training of foundational skills necessary for continued success in the workforce. The Council provides a great mechanism to accomplish this priority because of the diverse set of experiences, perspectives, and expertise in the Council's membership and the opportunities for key stakeholder to work together in collaboration to find workforce solutions.

The Wisconsin Department of Workforce Development (DWD) is the state's workforce agency that encompasses five of the state's six WIOA core programs including: Title I Adult, Dislocated Worker, and Youth Programs; Title III Wagner-Peyser Employment Services Program; and the Title IV Vocational Rehabilitation Program. The DWD secretary serves as the executive director for the CWI and program-level leadership are also represented on the CWI. The Wisconsin Technical College System (WTCS) is responsible for implementing Title II, Adult Basic Education, and the WTCS president serves on the CWI as well. A detailed membership roster of the CWI, including information on members' organizational affiliation and position title is available in section III(b)(3)(B). Bringing together program leadership, experts, and stakeholders provides opportunities for strong collaboration and alignment of initiatives to support the WIOA Core and Partner program activities in alignment with the strategies identified in section II(c).

In addition to coordination at the leadership level among the core program entities and the CWI, there are cross-agency WIOA Integrated Service Delivery (ISD) Teams that also work to ensure the coordinated implementation and alignment of the WIOA programs. The ISD Teams are responsible for carrying out the project work that has been agreed to at the WIOA leadership level and established by the WIOA Combined State Plan.

The existing ISD teams and their purposes are:

- **Policy and Guiding Principles:** To identify, investigate and approve policies, best practices, recommended actions, and tools for the WIOA Titles and partner programs as it relates to the Integrated Service Delivery model development and implementation in Wisconsin.
- **Communications:** To establish the overall communication strategy for the WIOA Titles and partner programs as it relates to the Integrated Service Delivery Model development and implementation in Wisconsin, including the work on the projects under the Common Intake and Data Integration Projects.
- **Data Steward:** To support the overall WIOA Leadership Data Strategy for the WIOA Titles and partner programs to meet their WIOA State Plan Commitments, and to carry out data activities needed to support the Integrated Service Delivery Model development and implementation in Wisconsin, including the work on Common Intake and Data Integration Projects.
- **IT:** To receive and communicate project ideas from the business teams, recommend IT solutions and coordinate the delivery of the projects for the WIOA Titles and partner programs as it relates to the Integrated Service Delivery Model development and implementation in Wisconsin, including the work on the projects under the Common Intake and Data Integration Projects.

Wisconsin's alignment of core programs includes establishing effective career pathway opportunities that combine guidance, education, training, and support services to help individuals be successful in their career goals. To help these individuals be successful, American Job Center staff need to be equipped with the training and resources they need to help guide individuals to appropriate programs and services

based on the individual career choices. American Job Center staff and counselors delivering career services will have access to a repository of training and professional development resources so that individuals seeking career services can work with staff who have the most current tools available to assist them in making well-informed decisions on career pathway opportunities.

Integrated Education and Training (IET) is the core educational strategy for career pathways jointly developed between WIOA partners. Expanding IET offerings will better serve WIOA partners and participants. 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.

Title II

Wisconsin Title II is focused on identifying and closing equity gaps across participant groups. With this focus, Title II outcomes, such as program participation, Measurable Skill Gains, and pre/post-test rates, are disaggregated across participant groups by age, gender, race, ethnicity, low-income status, single-parent status, and educational functioning level in Adult Education and English Language Learning programs. The WTCS Office developed a dashboard to present this data as an annual report shared with Wisconsin Title II providers. This dashboard is currently in Tableau and is being transitioned to PowerBI. This dashboard data is used to support program reflection and planning.

[WTCS Action Research](#) was conducted to dissect Adult Education participation trends and change agents as well as present strategies to maximize impact to grow program participation. This research utilized data to demonstrate the continued need for adult education and English language learning in the state of Wisconsin. Within Wisconsin over 354,000 adults are without a high school degree and those without a degree tend to experience higher levels of poverty. Despite the need, participation trends have declined within the state providers. Theories around this decline include low unemployment and higher wages that no longer require any high school credentials as well as the removal of placement tests for entrance into some technical college programs. Strategies mentioned to increase participation include delivering messages that matter to potential students as well as employers, distance education, and just-in-time supports.

Additionally, the Title II program prioritizes Integrated Education and Training (IET) as a means to help students achieve educational goals and create pathways to the workforce with skilled training. WTCS has provided ongoing professional development for IET and is coordinated by an IET Community of Practice for all providers, monthly Title II calls, monitoring visits, and provider technical assistance. Additionally, Wisconsin Title II maintains a curated repository of state and national resources to support the development of Integrated Education and Training, which includes achieving [equity in Integrated Education and Training](#). Wisconsin's AEFLA leadership has communicated the expectation to Title II providers that Integrated Education and Training is to be prioritized for Wisconsin's most underserved

communities and should develop strategies to engage populations that tend to have lower labor participation rates, including but not limited to individuals facing cultural and language barriers. Additionally, IET will be aligned with recognized credentials and/or industry certifications that provide participants with a pathway to economic mobility. The Wisconsin Title II leadership monitors these activities and expectations through the review of provider Integrated Education and Training offerings documented in the Wisconsin Integrated Education and Training Planning Tool and Title II monitoring activities such as the [Wisconsin AEFLA Program Review Process](#). Finally, Wisconsin Title II has aligned fiscal levers to support the scaling of Integrated Education and Training. All Title II providers are expected to offer an IET or partner with an organization that offers an IET.

Wisconsin Title II programs' efforts to increase access and inclusion include:

- The creation of the [WTCS System-wide Equity Report](#) which highlights goals for equity across the WTCS and includes tools and resources for achieving these goals
- The coordination of WTCS professional development across various topics, including [Open Educational Resources](#), [Inclusive Teaching](#), [Working As One](#), and [Equity in the Classroom](#), dedicated to equity in instructional pedagogy and access
- The expansion of access to external to the WTCS professional development available through COABE, LINCS, Workforce GPS, Achieving the Dream, Jobs for the Future, and the Community College Research Center
- Provider-led conversations and trainings on serving LEP communities including internationally trained professionals and refugees.

Serving Wisconsin's Justice Involved

Wisconsin Title II has made significant efforts in serving Wisconsin's Justice Involved populations. A memorandum of understanding (MOU) was developed with key leadership and staff at the technical colleges, the Incarcerated Populations Taskforce to include the Wisconsin Department of Corrections (DOC), Accreditation Liaison Officers workgroup, and Faculty Quality Assurance System (FQAS) workgroup. In addition, the DOC-led Education and Employment Cross-Agency Team (EECAT) group also focuses on educational programming, including Title II offerings in DAI facilities. This team includes members from the DOC, Wisconsin Technical College System (WTCS), Division of Workforce Development (DWD), Department of Public Instruction (DPI), and the Office of Program Services (OPS).

This team also focuses on achieving greater equity and inclusion within the educational programs that work closely with underserved justice-involved learners. This is done by sharing data, internally and across agencies, to evaluate program access across participant groups, and system performance outcomes that lead to employment opportunities, income sustainability, and a reduction in recidivism. Wisconsin Technical Colleges provides contextualized instruction to eligible students through several formats that best meet the needs of the learners, and which emphasize life-long learning as well as employability skills.

Veterans (JVSG)

Local Veteran Employment Representatives (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. Disabled Veteran Outreach Program staff (DVOPs) are housed at job centers and provide individualized career services for veterans with significant barriers (SBE) to

employment, and eligible spouses defined at section 2(a) of the Jobs for Veterans Act (38 U.S.C. 4215[a]), or other eligible persons as designated by DOL. Job center staff use a triage approach to identify veteran status and/or status of veterans with a significant barrier to employment (SBE). A triage questionnaire is included in the online Job Center of Wisconsin registration process which determines veteran status, status of an eligible spouse of a veteran, or family care giver of wounded, ill or injured service members. The system identifies those determined to have a SBE and notifies the Disabled Veteran Outreach Program (DVOP) staff or the consolidated staff of the individual's registration and eligibility for DVOP services. This process is useful as some individuals register for services without entering the job center. DVOPs provide the necessary services and use a case managed approach to assist the eligible persons with their employment needs. In addition to providing individualized career services to eligible persons 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 Administration (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.

OVES also has made it a priority to hire staff that represent the populations within the communities they serve, so we have been creating a more diverse staff mix on the management, LVER and DVOP side.

Title IV

Title IV, Vocational Rehabilitation, (DVR) has implemented several strategies to increase collaboration and program alignment. 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.

1. At the federal level,

- DVR has developed an MOU with the U.S. Department of Veterans Affairs and an agreement with DOL-funded Veteran's 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.
- DVR has cooperative agreements with three federally recognized tribes in Wisconsin that receive American Indian Vocational Rehabilitation (AIVR) grants from the Rehabilitation Services Administration. DVR also has cooperative agreements with a tribal college and the Great Lakes Inter-Tribal Council, each of which also receive grants from AIVR.

2. At the state agency level,

- DVR has a MOU with the Wisconsin Department of Children and Families (DCF, the agency that administers TANF) and developed a joint training for staff. The purpose of the MOU is for DVR and DCF's Division of Family and Economic Security to establish communication and a common

understanding regarding the roles, policies, and procedures to improve services to common customers. This MOU has four main goals:

1. Increase successful employment outcomes for individuals with disabilities,
2. Maximize available resources and reduce duplication of effort,
3. Increase program knowledge of both VR Counselors and W-2 Financial and Employment Planners related to disability and low-income employment resources, and
4. Promote effective collaboration and communication through the policies and practices documented in the DVR/W-2 Technical Assistance Guide (TAG).

- DVR has an interagency agreement with the Department of Public Instruction (DPI) to facilitate the transition of students with disabilities from school to employment.
- DVR has an interagency agreement that defines necessary relationships, policies, and procedures between DVR, DPI, and the Department of Health Services (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.
- 2017 Wisconsin Act 178 also requires the DVR, DHS, and DPI to collaborate, with the input of stakeholders, in the development of a joint plan to increase Competitive Integrated Employment (CIE) in Wisconsin.
- DVR and the DHS's Division of Care and Treatment Services coordinate oversight of Individual Placement and Support (IPS). IPS is an evidence-based model of supported employment that supports individuals experiencing mental illness in their efforts to achieve steady employment in competitive integrated jobs.
- DVR participates in the Wisconsin Community of Practice on Transition which 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.
- DVR is included in a departmental agreement with the Wisconsin Department of Corrections to provide job centers/labs in correctional facilities available to offenders.
- DVR also 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, Wisconsin's Independent Living Council, the University of Wisconsin, and the Wisconsin Technical College System.

3. With WIOA Title partners,

- DVR is co-located as a partner in 15 comprehensive "one-stop" job centers in Wisconsin, with co-location operating agreements between WIOA partners. 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 encourages consumers in job ready status to register with the DWD job seeker website called JobCenterofWisconsin.com (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 participates on all statewide WIOA Title partner committees and teams aimed at identifying common customers, providing referral services, data sharing, etc. in order to allow for a seamless one-stop experience for customers.

DVR's Career Pathways Advancement Initiative

Nationally and in Wisconsin, vocational rehabilitation agencies successfully help individuals with disabilities obtain and maintain employment. WIOA emphasizes helping individuals obtain 21st century skills to increase self-sufficiency and independence. To advance this shared objective, the Wisconsin Department of Workforce Development's Division of Vocational Rehabilitation (DVR) applied for a U.S. Department of Education Career Pathways Advancement (CPA) Initiative grant in Spring 2021 and was awarded \$14 million in September 2021 with the goal of enrolling 500 individuals. The CPA Initiative allows DVR to create resources and opportunities to support consumers to advance in a career in one of four fields: Healthcare, Digital/Information Technology, Construction, and Manufacturing.

In September 2023, after meeting the initial enrollment goal, DVR was awarded an additional \$6.4 to support 300 more job seekers with disabilities to participate in the program. Under the initiative, DVR is focused on using apprenticeships, career pathways, and other programs and services to increase wages, hours worked, and job opportunities and to improve self-sufficiency and reduce the use of public benefits.

DVR Diversity, Equity, and Inclusion Efforts

Feedback from staff, consumers, and the review of DVR data showed a need to focus on the experience of underrepresented populations (race, ethnicity, gender identity, LGBTQ+, and many others) within the DVR program for both consumers and staff.

DVR completed a Diversity, Equity, and Inclusion (DEI) needs assessment that involved a thorough review of current data, staff survey results, policies, and interviews with DVR staff, consumers, and other stakeholders. This assessment helped to inform the creation of a DEI Action Plan in 2023. Goals and activities that are a part of this plan will guide DEI efforts over the next five years.

Governor's Council on Workforce Investment (CWI)

As indicated above, the CWI will serve as a convener of all the necessary entities to ensure the state's strategies are successfully implemented and aligned across the core programs and Combined State Plan partner programs. CWI leadership will coordinate with key stakeholders and leaders from various state agencies, task forces, commissions, etc. to regularly participate in CWI meetings so they may hear input from CWI business members, employer champions, members of the public, etc. regarding the top concerns and priorities for the workforce system. The CWI will also continue its ongoing efforts to develop productive working relationships among workforce partners, agency staff, local Workforce Development Boards, educational institutions, and employers to identify common goals and work towards continuous improvements. An initial step the CWI has taken for this effort is coordinating with the Wisconsin Workforce Development Associations' Executive Committee to recommend to the Governor one of the State's local Workforce Development Board Directors to serve as an ex-officio member of the Council.

To further enhance alignment and collaboration among between the CWI and WIOA program partners, the CWI is restructuring its standing committees so the WIOA Executive Committee (comprised of cabinet secretaries from the Department of Workforce Development, Wisconsin Technical College System, Department of Health Services, Department of Children and Families, and Department of Corrections) is incorporated into the CWI committee structure.

B. Alignment with Activities Outside the Plan

Alignment with Activities outside the Plan. Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

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.

Job Quality Academy

Wisconsin was selected to participate in the U.S. Department of Labor's (DOL) Job Quality Academy in order to create systems that will increase access to career building opportunities through diversity, equity, inclusion, and accessibility efforts for the child care and healthcare industries. Through this work, Wisconsin will develop a job quality framework for the state and implement an action plan which focuses on the care economy, specifically early childhood education and healthcare.

Jobs for Veterans' State Grants

Jobs for Veterans' State Grant (JVSG) staff have an increased focus on some key defined veteran populations, including homeless, incarcerated, long term unemployed, recently separated, etc. With the JVSG manager being part of the WIOA Operations Team, the goal is to continually inform the WIOA partners of the services available to veterans and to focus on increased coordination and referral of veterans, not only for the traditional workforce program services through the WIOA core programs but also with Apprenticeship, TAA (as applicable), TANF and SNAP, so veterans can access services that will assist with their overall employment goals. At the local level, DVOP staff do outreach at a myriad of locations throughout the state where they can connect with veterans who need employment assistance. DVOP staff also work very closely with DVA staff to make sure these veterans are aware of and access the full array of veteran benefits that the State of Wisconsin offers.

FoodShare Employment and Training

FoodShare Employment and Training (FSET) is Wisconsin's Supplemental Nutrition Assistance Program Employment and Training program and is an ongoing State Plan partner. 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.

The Wisconsin Department of Health Services (DHS) operates a regionalized, county-administered FSET program. Regional service area boundaries correspond with the state's 11 Workforce Development Areas (WDAs). Each FSET region administers and delivers FSET services within the region by partnering with local service providers and community organizations. 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. Furthermore, FSET vendors have established a wide array of relationships with employers across their regions.

Wisconsin Apprenticeship

Certified pre-apprenticeship funding is administered through local Workforce Development Boards (WDBs) with federal apprenticeship grant dollars, and participants may be co-enrolled with other WIOA services. Supportive services and reimbursements are administered through WIOA partners, the Wisconsin Technical College System (WTCS) and DWD's Bureau of Apprenticeship Standards (BAS), with federal apprenticeship grant dollars. Registered Apprenticeship and Affirmative Action Programs sponsors will utilize community-based organizations, technical colleges, job centers, state agencies and other workforce partners to establish recruitment networks with the primary purpose of diversifying their apprenticeship workforce.

BAS is working closely with internal DWD workforce partners (including the Bureau of Workforce Training, Bureau of Job Service, Office of Veterans Employment Services and the Division of Vocational Rehabilitation), as well as local WDBs, and its network of apprenticeship sponsors to advertise and deliver supportive services, reimbursements and to implement affirmative action plans. BAS is following the appropriate statutes governing registered apprenticeship training and affirmative action. BAS is also coordinating with its workforce partners and the U.S. Department of Labor to deliver supportive services, reimbursements, and pre-apprenticeship training in accordance with federal guidelines and regulations.

The Wisconsin 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, BAS Apprenticeship Training Representatives (ATRs) are partnering with local WDBs on several levels, including the Business Services Team, to provide services to applicants and in the local job centers.

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 on Wisconsin's Eligible Training Programs List (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. These grants will also allow the state to continue the program's historic growth and expand the number of pathways to careers in high-demand sectors.

For example, as demonstrated in the economic and workforce analysis in section II, projections show a critical need for nurses with demand growing in Wisconsin over the next 20 years. As the demand for skilled nurses continues to grow, the DWD has launched a pilot Registered Nurse (RN) apprenticeship pathway to address the nursing demand in Wisconsin. The pilot, an innovative partnership with UW Health and Madison College, is the first to incorporate an associate degree as well as compliance with rigorous nursing industry certification standards.

Additionally, it is estimated that Wisconsin will have 1,491 annual total job openings for child care workers according to the Wisconsin Long Term Occupation Employment Projections 2020-2030. DWD and DCF are collaborating on a two-pronged project to address the dual challenge of too few child care providers and too few child care educators. DWD will address the shortage of qualified early childhood educators by expanding career pathways through the development and promotion of apprenticeship programs in the early care and educational sectors to attract and retain more diverse talent. DCF will address the shortage of child care providers by expanding supports provided to entrepreneurs to pursue state licensure to open a child care business. The project seeks to increase opportunities for vulnerable workers and build a better care economy in Wisconsin. The entire state and the workforce in particular will benefit when working families have access to affordable child care and a quality education.

Further, with assistance from DOL-administered grant and in collaboration with WIOA Combined State Plan partners, BAS is working to conduct outreach to increase awareness of apprenticeship opportunities, create new opportunities for emerging-sector employers to participate in apprenticeship, increase apprenticeship partnerships with the Wisconsin Department of Corrections, improve systems through technology updates, enhance sponsors' ability to track their apprentices' progress using technology, and boost the connection between certified pre-apprenticeship and registered apprenticeship programs.

Wisconsin Technical College System (Title II)

In September 2016, Wisconsin's educational entities signed a memorandum of understanding (MOU) that reinforces the role of career and technical education and career pathways among the state's educational entities to achieve what is known as Wisconsin's 60Forward credential attainment goal. 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."

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.

Wisconsin Title II leadership has been approved to offer *Ability to Benefit* for five years. This program works in coordination with Wisconsin's Title II programs to provide dual enrollment opportunities to individuals that desire to both complete a high school credential or equivalent and to complete a pathway credential. In addition, the reinstatement of Pell grant eligibility for Justice-Involved students creates additional opportunities for collaboration and alignment with WIOA partners.

C. Coordination, Alignment and Provision of Services to Individuals

Coordination, Alignment and Provision of Services to Individuals. Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas The activities described shall conform to the statutory requirements of each program.

Unemployed Individuals: Within the Department of Workforce Development, the Division of Employment and Training (DET) and the Unemployment Insurance (UI) Division work collaboratively to provide the Reemployment Services (RES) program, a formalized program for jobseekers required to look for work as a condition of receiving UI benefits.

With this program, online services and information are combined with local resources and services available through the Wisconsin Job Center system, maximizing partnerships between agencies working together to assist job seekers. These partnerships include representatives from Wisconsin Job Service, Local Workforce Development Boards, Veteran organizations, and other federal, state or local agencies working collaboratively.

In accordance with both state and federal directives, the RES program has four purposes:

- Reduce UI duration through improved employment outcomes;
- Strengthen UI program integrity;
- Promote alignment with the vision of the Workforce Innovation and Opportunity Act (WIOA); and
- Establish RES as an entry point to other workforce system partners.

New requirements and service strategies were implemented in 2018 for Wisconsin's RES program. These changes apply to all UI claimants required to look for work. Claimants go through several compliance steps, including:

- Full registration on the Job Center of Wisconsin website, including development of a current resume.
- Completion of an online Reemployment Services orientation and assessment.
- Additional job search activities as required, which may include self-scheduling and participation in virtual or in-person activities at the job center with job service staff.

Participants are selected for RES after they file a UI claim, are determined as being required to search for work, have successfully registered on JobCenterofWisconsin.com, and have received their first UI payment. Using a triage-based methodology, the program is designed to determine what level of service is appropriate to help a customer become reemployed more quickly. Some customers conduct their job seeking efforts independently and others needing more in-depth assistance will be scheduled to participate with virtual or in-person services to do a more in-depth assessment and overview to help eliminate barriers that may be keeping someone unemployed longer.

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 (TANF) work program and was added as a new combined State Plan partner beginning PY2020-2023. State level representatives from the Wisconsin Department of Children and Families (DCF) have been 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.

DCF contracts with local non-profit and for-profit agencies to administer the W-2 program, of which two are also local Workforce Development Boards, to administer the W-2 program. W-2 contract agencies collaborate with the WIOA program with services targeting low-income parents. W-2 provides employment preparation services, case management and cash assistance to eligible families. Low-income parents, non-custodial parents, and pregnant women may participate in W-2. W-2 case managers provide direct services and resources to eligible families to help them get a job and provide case management services to help them stay employed and advance in their career. In addition to employment, W-2 has supportive work experience opportunities through supervised worksites where participants can work on their soft skills and learn basic workplace norms. W-2 can also assist participants with vocational education and training resources, as well as with other resources and services such as assistance with housing, child care, and applying for Supplemental Security Income (SSI) / Social Security Disability Insurance (SSDI) based on informal and formal assessment outcomes.

DCF also administers two TANF funded subsidized employment programs: Transform Milwaukee Jobs (TMJ) and Transitional Jobs (TJ). DCF contracts with workforce agencies in Wisconsin to provide these services. These programs offer subsidized employment opportunities to low-income parents, including non-custodial parents, and youth between the ages of 18 and 25 who have aged out of out of home care. TJ and TMJ agencies coordinate with a variety of community and business services groups, and regularly participate in job fairs hosted by educational institutions, job centers, or other community groups. TJ and TMJ agencies maintain involvement with affiliated community groups such as the Milwaukee Transitional Jobs collaborative, Tribal Services, workforce development agencies, re-entry programs and fatherhood programs to keep them abreast of employment issues and needs in their regions. Agencies work in partnership with homeless and domestic abuse shelters to provide employment as part of wrap around services, and coordinate with Youth Services and Independent Living programs to connect foster youth with employment options. If a participant does not have the desired skillset for a particular position, agencies will work to co-enroll with other programs such as WIOA, FSET and DVR where they may be able to provide assistance with training, on-the-job training, or other job supports.

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 is included on the WIOA leadership team and its subcommittees.

Individuals with Disabilities: The Division of Vocational Rehabilitation (DVR) within DWD 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, 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 child care subsidy programs for low-income individuals and families. DVR and W-2 have established a memorandum of understanding (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 who have aged out of out-of-home care (OHC), including foster care, court-ordered kinship placements, and congregate care settings. All children and youth need to learn basic life skills in order to become successful adults. For adolescents in OHC, 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 have aged out of OHC, are also provided throughout the state by Transitional Resource Agencies. These services assist youth with obtaining training, education, health insurance, employment services, and housing.

Veterans: The mission of DWD's Office of Veteran Employment Services (OVES) is to "advance veterans into the workforce through targeted business engagement and effective employment services." Local Veteran Employment Representatives (LVERs) engage with Job Service and Local Business Service teams and promote veteran hiring to Wisconsin employers and employing agencies. They assist in the organization of job fairs and hiring events and facilitate employer workshops that highlight the value veterans bring to the workforce.

Wisconsin's Jobs for Veterans State Grant (JVSG) Disabled Veteran Outreach Program (DVOP) staff provide individualized career services to veterans with significant barriers to employment (SBE), eligible spouses, and other eligible individuals. OVES has staff assigned and located in each of the 11 Workforce Development Areas (WDAs) in Wisconsin. DVOPs provide comprehensive assessments, career guidance, individualized employment plans, staff-assisted services, 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.

Wisconsin job center staff use a triage approach to identify veteran status and/or status of veterans with a significant barrier to employment (SBE). A triage questionnaire is included in the online Job Center of Wisconsin registration process which determines veteran status, status of an eligible spouse of a veteran, or family care giver of wounded, ill or injured service members. The system identifies those determined to have a SBE and notifies the Disabled Veteran Outreach Program (DVOP) staff or the consolidated staff of the individual's registration and eligibility for DVOP services. This process is useful as some individuals register for services without entering the job center. The DVOP completes a comprehensive assessment, develops an individualized employment plan, and conducts necessary follow-up using a case-managed approach to assist the veteran in gaining employment. Once the veteran is job-ready, the LVER works to match the veteran with an employer. 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 on conducting job searches and workshops, establish job search groups, and 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.

DVOP staff work with many community partners, such as County Veteran Service Officers, veteran service organizations, Homeless Veteran Rehabilitation Programs, correctional facilities, and other veteran-centric/community entities. The partnership with these agencies creates an all-source environment where a veteran seeking services will have the opportunity to work with DVOP staff and receive other services at the same location. The goal of outreach is to identify veterans seeking other services germane to veterans and providing employment and other services/resources at one location.

JVSG staff work with partner agencies and programs to ensure that priority of service is provided to veterans and eligible spouses. Working closely with partner agencies assures that there is no duplication of services and that veterans receive all services that they are eligible and qualified to receive. JVSG staff partner with numerous state and federal agencies to provide education and workforce training to veterans and certain eligible spouses. Based on comprehensive assessments and the desire and eligibility of the veteran, JVSG staff provide resources and referrals to the Wisconsin Department of Veteran Affairs which offers free education through the Universities of Wisconsin and Wisconsin Technical College System using the Wisconsin GI Bill (state). Referral to the WIOA workforce training program that will provide funding to eligible veterans for specific job-related training to enhance or transfer to new skills required for careers. Referral to Veteran Affairs for enrollment into various training programs using the Montgomery GI Bill, Post 9/11 GI Bill, Chapter 31 – Veteran Employment and Readiness program; or state/federal apprenticeship programs and programs associated with apprenticeships such as – Troops to Teachers, Helmets to Hardhats, Veteran in Piping (VIP), Combat to Construction.

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. Additional information on the Jobs for Veterans State Grant plan is detailed under section VII.

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 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 has provided professional development regarding One Stop Partnerships with DWD and seeks to find ways to partner and increase communication and collaboration. WTCS will remain an active partner for professional development and training on WIOA in the future.

Ex-Offenders: DWD takes pride in its collaboration with the Wisconsin Department of Corrections (DOC) to engage individuals in their care before they are released, and to connect them with DWD job seeker services after release. A crucial component to the success of these efforts is the partnerships with DWD, Wisconsin's 11 local Workforce Development Boards (WDB) and the Wisconsin Technical College System (WTCS), which help make engaging with and training justice-involved individuals possible.

At the foundation of the collaborative work between DWD, DOC, local WDBs, and WTCS are the job labs DWD maintains in DOC facilities. These job labs function similarly to the job centers DWD operates in communities around the state. The state recognized the need to place additional focus on reaching harder-to-serve populations to meet employers' workforce needs. Among the targeted groups, DWD identified the need to engage justice-involved individuals in advance of their release from DOC care to re-establish connections to the workforce, so these individuals are best prepared to return to their communities.

DWD identified and implemented several strategies for preparing justice-involved individuals for employment upon release, including:

- Development of a pre-apprenticeship programming in correctional institutions.
- Incorporation of employment/training programs in juvenile justice institutions.
- Expansion of registered apprenticeship opportunities within correctional institutions.
- Development of strategies to increase employer education and awareness of hiring justice-involved individuals.
- Increasing employer collaboration with apprenticeships, workforce training, and placements of justice-involved individuals.
- Creation of job labs within DOC facilities to provide job readiness, career assessment, and job service programming for soon-to-be-released justice-involved individuals.

DWD opened its first job lab at Oakhill Correctional Institution in 2018. Since then, DWD has opened 10 more job labs in DOC facilities around the state. Ten of the job labs are classroom-style rooms within correctional facilities and one, at New Lisbon Correctional Institution, is a mobile lab. In 2023, DWD and DOC continue to partner on innovative solutions and partnerships. This includes additional collaboration between the two agencies to create job labs at local probation and parole offices throughout Wisconsin, as well as new partnerships with the Wisconsin Department of Health Services for two new job labs at the Wisconsin Resource Center in Oshkosh, WI.

Migrant and Seasonal Farmworkers: The Migrant and Seasonal Farmworker program is administered by the DWD's 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: The contracted partners of the Bureau of Refugee Programs (BRP) provide direct services and supportive resources such as physical health and mental health screenings, health education and healthcare 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 BRP administers income support programs for refugees which provide cash and medical assistance for up to 12 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 healthcare to refugees who do not qualify for Medicaid or BadgerCare Plus.

BRP also administers the Wilson-Fish TANF Coordination Project (WFTCP). BRP contracts with four W-2 agencies in nine Wisconsin counties to supplement refugee families' participation in W-2 and provide them with cultural and language appropriate case management. To help refugee families in the WFTCP address their priority needs (such as employment and language training) and develop a long-term plan to fully adapt to life in the U.S. BRP and Refugee Program Liaisons at the W-2 agencies work in close collaboration with a "CARE Network" that includes resettlement agencies and community-based organizations. In addition to meetings with numerous statewide and regional refugee-focused networks of service providers, BRP engages with employers and attends workforce development meetings including Employ Milwaukee, Inc. (the state-certified Workforce Development Board serving Milwaukee County, also referred to as WDA 2).

BRP also coordinates with the WTCS on how their WIOA Title II (Adult Education and Family Literacy) funded programs can be used to assist refugees and other new arrivals. For example, with input from BRP, in 2022-2023, the WTCS developed an online resource (Resources Available for Immigrants and Refugees) which identifies refugee program contacts at each of the system's 16 campuses across Wisconsin who can assist new arrivals with their adaptation to life in Wisconsin.

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 Wisconsin's job centers improves the approach for working with the people accessing the programs. Recognizing that educational and economic success requires addressing and interrupting trauma enhances the ability to create services and learning environments that support customers holistically. DWD is making staff training on Trauma-Informed Care available to all frontline partners through the state's virtual enterprise learning management system known as Cornerstone.

The Bureau of Job Service within DWD's Division of Employment and Training is committed to the practice of Trauma Informed Care in the clients and customers utilizing its programs and services throughout the state. The Bureau of Job Service has several staff who participate in ongoing regional Trauma Informed Care meetings in their districts and has dual representation on the State Trauma Informed Care Consortium. Members of the staff who are career counselors have been trained in Trauma Informed Care and continue sharing the knowledge and benefits of Trauma Informed Care by training staff in their districts on Trauma Informed Care.

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.

Within DCF, the Bureau of Working Families (BWF) in the Division of Family and Economic Security has encouraged its employment programs, including Wisconsin Works (W-2), Transitional Jobs (TJ), and Transform Milwaukee Jobs (TMJ), to incorporate Trauma Informed Practices into program services. Two W-2 agencies, Workforce Resources Inc. and UMOs, as well as all TJ and TMJ agencies, have been trained on the Trauma Screening, Brief Intervention, Referral to Treatment protocol or T-SBIRT. T-SBIRT is a 10-45-minute protocol that helps those applying for these employment programs generate insight into the extent and effects of their trauma exposure and enhance their motivation to engage in behavioral or mental health services. The goal is to help job seekers face multiple barriers to employment due in part to their history of trauma exposure and address trauma while also promoting job placement and improving program outcomes. T-SBIRT was developed at UW-Milwaukee and the Institute for Child and Family Well-Being.

Protected Groups: One-stop partners coordinate activities and resources through local comprehensive and affiliate job centers and through many outreach locations. WIOA Title I-A and I-B Policy 5.5-Affirmative Outreach requires local Workforce Development Boards (WDBs) and service providers to take appropriate steps to ensure that they are providing equal access to their WIOA Title I programs and activities. These steps should involve reasonable efforts to include members of the various groups protected by these regulations (hereinafter referred to as "protected groups"), including, but not limited to: persons of different sexes, various racial ethnic/national origin groups, various religions, individuals

with Limited English proficiency, individuals with disabilities, and individuals in different age groups. Outreach efforts may include, but are not limited to:

- Promoting programs and activities in media outlets (including the Internet) that target protected groups;
- Sharing information about program offerings with schools and community-based organizations and service agencies that serve protected groups; and
- Consulting with appropriate community organizations about ways outreach to protected groups may be improved.

To meet the minimum requirements of affirmative outreach, DWD-DET requires local WDBs to:

- review Census or other reliable information on an annual basis to determine the protected groups in the area who could potentially use WIOA Title I programs and activities;
- make efforts to use One-Stop partner resources and consult with one-stop partners about ways to improve outreach and service for protected groups;
- ensure staff awareness of outreach efforts through training and orientation; and
- maintain documentation of all outreach efforts, including contacts with one-stop partners, for monitoring purposes and make such documentation available for review by local, state, or federal EO Officials during monitoring and/or upon request.

Each local workforce development area (WDA) is monitored annually to ensure they and their one-stop partners are providing outreach to diverse populations in their area. If they fail to comply, the local WDB must provide a corrective action plan to address the deficiency.

In Wisconsin, the alignment of services to holistically support WIOA participants also occurs through the one-stop and comprehensive job center partners, which includes statewide community-based organizations and literacy councils. This network of providers and services provides support that include ensuring coordination with employers to communities and individuals that are impacted by un- and under-employment.

The WTCS Office conducts program review with Wisconsin Title II providers to ensure compliance with and improved performance under WIOA and AEFLA. All Wisconsin Title II providers are required to participate in program review. The purposes of the program review process are to:

1. Ensure that Wisconsin AEFLA programs meet AEFLA and WIOA requirements;
2. Improve the quality of AEFLA funded activities;
3. Provide technical assistance in identifying and resolving program challenges; and
4. Ensure the accuracy of data collection and reporting.

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. With an emphasis on diversity, equity, and inclusion, 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.

D. Coordination, Alignment and Provision of Services to Employers

Coordination, Alignment and Provision of Services to Employers. Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

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 local Workforce Development Board, DWD Division of Employment and Training's Bureau of Job Service, Bureau of Apprenticeship Standards, Office of Veterans' Employment Services and Division of Vocational Rehabilitation, and other WIOA partners programs as required or deemed appropriate 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.

DWD's Division of Vocational Rehabilitation (DVR or Title IV) has 12 business service consultants and one business services program manager 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.

Regional teams will continuously assess the local workforce landscape and identify additional allies and contributors that can add value to the team, including partners that serve underrepresented individuals. WIOA partner programs are continuously exploring methods to co-enroll customers who can benefit from diverse services.

The Business Service Teams use a shared platform – Job Center of Wisconsin Business (JCWB or 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. Additionally, 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.

In February 2023, DWD launched its new eGain system, which allows customers to chat virtually with JCW customer service representatives while responding to required questions or navigating specific pages.

Title III and Title IV are actively engaged in a project designed to modernize the existing JCWB platform. The goals include using "plain language" to describe services, expanding service options to include specific options each WIOA Title offers business customers, and developing the capacity to create reports that offer a clear picture of the types of services the business is requesting, receiving, and benefitting.

Additionally, WIOA partners are continuously engaging in statewide events, such as WIOA Roundtables and the Winning with Wisconsin's Workforce forums, designed to bring regional business and workforce system partners together to discuss economic and labor market opportunities, resources and innovative solutions to meet a variety of workforce needs.

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). Title II (AEFLA) programs also see the growth of internationally trained professionals (ITPs) statewide as an incredible opportunity and is working to ensure that Title II programming addresses their unique needs so that they can be employed in fields which utilize their skills and expertise thereby benefitting Wisconsin employers.

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 programs that connect learners to the workforce are approved by the WTCS Office and require vetting through a labor market needs assessment to ensure the offering are 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 career pathway 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.

E. Partner Engagement with Educational Institutions and Other Education and Training

Partner Engagement with Educational Institutions and other Education and Training Providers. Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

Governor Evers' appointment of educational leadership in Wisconsin to the Governor's Council on Workforce Investment (CWI) is the cornerstone of the state's engagement with educational institutions through the workforce development system. Current CWI members who represent educational institutions are the president of the Wisconsin Technical College System (WTCS), the state superintendent

of the Wisconsin Department of Public Instruction (DPI), the vice 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 (DWD) and WTCS. 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.

Wisconsin's primary strategy for engaging education and training providers in the workforce development system is to align its Eligible Training Programs List (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 (DPS).
- 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 Department of Workforce Development's (DWD) Bureau of Apprenticeship Standards (BAS).
- a barbering, cosmetology, real estate, or certified nursing assistant training programs approved by the Wisconsin Department of Health Services (DHS) or DPS.
- a Community Based Residential Facilities (CBRFs) program with instructor(s) approved by the Wisconsin DHS through University of Wisconsin-Green Bay.

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 continue to 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.
- 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.

Wisconsin's workforce system is considering additional strategies to further enhance collaboration and continue to expand K-12 Career Pathways. Potential initiatives include:

- Exploring additional areas which DPI and DWD could collaborate to better address the needs of students facing multiple barriers such as race, income, and parental status. Areas to explore could include, but are not limited to:
 - Job Center of Wisconsin services
 - Online resources such as Skills Explorer – an online job search tool that lets job seekers search for openings based on acquired skills instead job titles. Skill Explorer uses cutting-edge technology to search skill sets and produces occupational categories spanning many different industries.
 - Labor Market Information training
 - In-school youth programs and services
 - DVR services
 - Industry-recognized credentials included in the Technical Incentive Grant

- Examine more areas for collaboration between K-12 career pathway and adult career pathway efforts.
- Engaging business services staff from local Workforce Development Boards in the planning for new and revised Regional Career Pathways (RCP) in order to identify local employers that would like to support pathway development for youth and adults; and focusing partnership efforts on RCPs related to in-demand industries and occupations such as: Information Technology and Artificial Intelligence, Biotechnology, healthcare informatics, robotics, business services surrounding large databases and quantitative expertise, and IT systems design and programming.
- Identifying strategies to better align employer outreach efforts of youth apprenticeship with other work-based learning programs.
- Exploring funding opportunities for local school districts to strengthen RCP related to federal infrastructure investments made possible through the Infrastructure Investment and Jobs Act, the CHIPS and Science Act, and the Inflation Reduction Act.

Alignment to Labor Market Needs

Secondary: 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.

F. Improving Access to Postsecondary Credentials

Improving Access to Postsecondary Credentials. Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

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 adult education 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.

The Wisconsin Technical College System (WTCS) has been a leader in the career pathways framework statewide. Across the WTCS, colleges have implemented multiple entry and exit points within postsecondary pathways resulting in the creation of hundreds of credentials. Wisconsin employers play a vital role in the development of WTCS career pathways. Before formal approval from the WTCS Office, each credential within a career pathway is fully vetted through a labor market needs assessment and concept investigation. The career pathway development process includes the collection, analysis, and synthesis of employer feedback via focus groups or surveys and rigorous labor market analysis of occupational projections through secondary labor market data. WTCS colleges also collaborate with district employers to design 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 at a WTCS college, 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 WTCS career pathways are responsive to local workforce needs.

The Title II program scales Integrated Education and Training to improve participant access to postsecondary credentials within the pathway framework. Further, the Title II program prioritizes

Integrated Education and Training to support addressing equity gaps and enhancing economic mobility. As previously described, the Title II program supports equitable access and success in Integrated Education and Training in multiple ways that include: coordinating equity- focused professional development for Title II providers, establishing the expectation among Title II providers that Integrated Education and Training is prioritized for Wisconsin’s most vulnerable communities and aligned with workforce needs, is actively monitored to identify promising models or areas of refinement and is supported through fiscal levers.

Improving Access

WTCS utilizes Title II providers, in collaboration with other WIOA partners (such as 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 (IET), and the submission to the Department of Education of a recognized Ability to Benefit State Plan in 2022 which allows Title IV funding for eligible adult learners, so that eligible Title II participants may simultaneously complete a high school equivalency credential while enrolling in occupational training. In addition to Title II federal funds, the WTCS Board awards funds to support the development and expansion of Integrated Education and Training. These additional funds are available as of fiscal year 2023 and 2024 through the Integrated Education and Training Development and Expansion grant category. Additionally, Title II leadership created an Integrated Education and Training Community of Practice. The goal of this community of practice was to help providers who were not currently offering an IET start to develop one and to improve IETs by providers who were currently offering them by best practice sharing. WTCS will continue to work with Title II providers to scale IET programming throughout the state utilizing professional development and the IET Community of Practice.

DVR Assistance for Training

The state vocational rehabilitation program has developed several strategies and programs that have improved access to recognized postsecondary credentials. The Wisconsin Department of Workforce Development Division of Vocational Rehabilitation (DVR) implemented the Career Pathways Advancement Grant. The Career Pathways Advancement grant allows DVR to create resources and opportunities to support consumers to advance in a career in one of four fields: Healthcare, Digital/Information Technology, Construction, and Manufacturing. DVR has issued helpful guidance and training to support staff 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 \$6,000 per year to assist with costs of postsecondary education tuition. Customers who are enrolled in the Career Pathways Advancement grant may be eligible to receive additional training funds. 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.

Healthcare Postsecondary Credentials

Through participation in the Governor’s Council on Workforce Investment, DHS and FSET have placed increased emphasis on providing opportunities in the healthcare industry and related postsecondary credentials. Specifically, Certified Nursing Assistant (CNA) and personal care worker positions that have high vacancy levels, and an increasing need with an aging population. DHS continues to emphasize the importance of providing these training services and employment opportunities within FSET.

Registered Apprenticeship

The Wisconsin Bureau of Apprenticeship Standards (BAS), with assistance from U.S. Department of Labor (DOL)-administered grants, continues to expand Registered Apprenticeship (RA) 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 occupation pathways such as diesel technician, supply chain specialist, yacht service technician, lab animal care technician, medical lab technician, caregiver, and human resources specialist. This expansion will continue, with plans to add six new pathways in the healthcare, transportation, and service industries among many others.

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 8,400 enrolled apprentices in the 2022-23 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 earning an associate degree.

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.

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. Wisconsin recently received \$5,000,000 in Congressionally directed funding to create innovative career pathways in educational sectors to attract and retain more diverse talent and increase affordable access to child care by expanding and enhancing early childhood education apprenticeship programming. Through a partnership between DWD and DCF, a portion of this funding will be used to deliver curriculum for new individuals enrolled in an early childhood educator Certified Pre-Apprenticeship program and to

incentivize the successful bridging of youth apprentices to registered apprentices in early care education by reimbursing youth apprenticeship consortia for each successful bridge placement.

Aside from Certified Pre-Apprenticeship programs, Wisconsin's Youth Apprenticeship (YA) program may serve as an introduction to Registered Apprenticeship (RA). 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.

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 associate 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 associate degree classes into the registered apprenticeship related instruction curriculum. DWD and the University of Wisconsin-Stout (UW-Stout) are partnering on a first-of-its-kind program in Wisconsin to combine instruction at a four-year college with a Registered Apprenticeship program. The new [Workforce Development Specialist Certificate program](#), also known as the Train the Trainer apprenticeship, started this fall to teach students about employment and training solutions that meet the needs of businesses and workers. UW-Stout is the first four-year university collaborating with Wisconsin Apprenticeship since apprenticeship began in 1911 to offer classes that fulfill instruction requirements for a Registered Apprenticeship and could be credited toward an undergraduate or graduate degree program. The three-class online program teaches students ways to design, develop, implement, and evaluate training and development solutions.

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.

DWD's Office for Veterans Employment Services management and local DVOPs/LVERs are working closely with DWD's Bureau of Apprenticeship Standards and the Wisconsin Department of Veteran Affairs to implement new strategies and efforts to increase the numbers of veterans in apprenticeship. There are veterans who want this option, but do not understand how to navigate this program effectively. Additionally, DVOPS work closely with veterans and with DVA to ensure they access any training opportunities available to them, including GI benefits and WIOA core programs.

In November 2023, an unprecedented 17 employers participated in the Vets Ready Employer Initiative or the year. The initiative encourages employers to build a support system within their workplace, hire and retain more veterans, and connect to veterans in the community and their families. DWD's Office of Veteran Employment Services reviews annual nominations and recognizes businesses that meet certain

criteria with either a gold or silver certification in one of three categories: small, medium, and large. Award program partners include the Wisconsin Department of Veterans Affairs, Wisconsin Department of Disabled American Veterans, and the Wisconsin Veterans Chamber of Commerce.

Wisconsin Fast Forward Technical Education Grants

Wisconsin Fast Forward Technical Education Equipment Grants offers the opportunity for Wisconsin school districts to apply for funding for the acquisitions of equipment that is used in advanced manufacturing fields in the workplace, together with the software necessary for the operation of that equipment, and any instructional material necessary to train pupils in the operation of the equipment. The purpose of the grant is to train high school students in advanced manufacturing fields to help address Wisconsin's skilled worker shortage. The grant is intended to accelerate the transition of students into the workforce by preparing them for careers and to provide students and their families the means to reduce higher education costs by providing dual enrollment credits, industry-endorsed certificates, and technical endorsements on high school diplomas.

G. Coordinating with Economic Development Strategies.

Coordinating with Economic Development Strategies. Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

Governor Evers' appointment of the Wisconsin Economic Development Corps. (WEDC) CEO to the Governor's Council on Workforce Investment (CWI) further aligns the state's economic development strategies and the workforce development system. WEDC participation on the CWI ensures WIOA partners are in touch with the needs of key industries of the state and encourages the development of a state economic development strategy that comprehensively reflects the needs of the workforce. In its Wisconsin Tomorrow 2.0 report, WEDC announces the state's economic strategy for growth is based upon the "authentic Wisconsin ideal – that everyone deserves an opportunity to prosper," and that "Wisconsinites should not be held back because of inequity or lack of access to infrastructure, health care or education." The strategy supports connecting the dots between all investments and policies to overcome barriers such as lack of access to child care, broadband, transportation, and other key areas that have become crucial components of both economic and workforce advancement across the state.

A cornerstone of the partnership between WEDC, the Department of Workforce Development (DWD), and other partners is the Workforce Solutions Initiative, a \$158-million investment by Gov. Tony Evers to address the state's workforce needs and support innovative pandemic recovery efforts. This investment in ARPA-SLFRF funding included:

- **Workforce Innovation Grants (WIG):** The \$128 million Workforce Innovation Grant Program is a collaboration between WEDC and DWD to invest in a wide range of innovative strategies to address local workforce and economic concerns. These grants support 27 unique projects addressing shortages of workers in healthcare, child care, education, advanced manufacturing, skilled trades, and more. Additionally, these grants support projects addressing housing shortages and transportation solutions for low-income workers; access to affordable and high-quality child care for workers; and entrepreneurial skills training.

- **Worker Advancement Initiative (WAI):** Administered by DWD and managed by Wisconsin's 11 workforce development boards, WAI is a \$20 million investment in work-based learning and/or wage-subsidized occupational skills training for individuals who experienced negative economic impacts related to the COVID-19 pandemic. Since its inception, this program has seen significant co-enrollment with WIOA Title I programs. DWD's Division of Employment and Training (DET) is using this pilot project to collect data on increased participant success when receiving wage-replacement supportive services while engaged in training. This innovative pilot ensures participant success by providing wage-replacement subsidies to individuals engaged in work-based or classroom learning opportunities. The project realizes greater flexibility than more traditional workforce funding and offers opportunities for co-enrollment and braided funding.
- **The Worker Connection (WC) Program:** This program is a \$10 million investment in workforce system navigation assistance and outreach to populations that are historically disconnected from workforce services. The program has realized early successes in connecting individuals with myriad workforce services and helping them to navigate the various types of assistance available to them. The program has more than 2,200 participants.

Communication and coordination among economic and workforce development entities, along with private employers and industry groups, have improved significantly in recent years thanks to working collaboratively on these pilot programs. The relationships built through these programs will also allow all partners to share, apply, and incorporate the lessons learned and best practices in their ongoing programs. For example, WEDC utilized its annual statewide economic development summit to highlight and share with employers on innovative and collaborative solutions to address recruitment and retention challenges by working with the workforce system.

Locally, all 11 local WDBs and members of their local Business Service Teams coordinate with economic development entities, strategies, and activities, working with WEDC's Regional Economic Development Directors. 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.

Regional Tech Hub

Coordinating strategies with the WEDC, DWD, CWI and other partners allows additional opportunities to maximize assets and leverage opportunities for future advancements of the workforce system. In 2023, 15 public and private partners formed the Wisconsin Biohealth Tech Hub Consortium to increase collaboration and to seek the Regional Technology Hub (RTH) designation from the U.S. Economic Development Administration (EDA). Consortium members include the members of the public and private sector represented on Council on Workforce Investment such as WEDC, University of Wisconsin System administration and UW-Madison; Rockwell Automation, Milwaukee Area Technical College and Madison Area Technical College; Employ Milwaukee, Inc. (which is Milwaukee County's local Workforce Development Board), and WRTP BigStep, a jobs training nonprofit. Additional members of the consortium include health technology companies GE HealthCare, Exact Sciences, Accuray and Plexus; BioForward Wisconsin, representing the state's biotechnology, medical device and related industries; the Madison Regional Economic Partnership and Milwaukee7, both of which are regional economic development organizations.

Wisconsin received the RTH designation in October 2023 – allowing Wisconsin to compete for up to \$75 million in funding under the federal CHIPS and Science Act of 2022. The recognition from EDA enables

stakeholders to scale up operations to a global level by providing shared data and systems to drive innovation; aligning and scaling the supply chain and manufacturing sector; improving access to capital to start and grow businesses; increasing lab space and expanding opportunities for worker housing and transportation; and ensuring that people across Wisconsin, including rural and traditionally underserved communities, can share in the benefits of this new sector.

As Wisconsin's biohealth sector grows, it will contribute to a "good jobs" economy by allowing employers to develop, hire, and retain a skilled, diverse workforce in jobs with benefits and upward mobility. By increasing their collaboration, consortium members will be able to better forecast demand for jobs, careers, targeted credentials, and skills; allow businesses to implement skill-based hiring and career advancement; and develop an employer-driven regional workforce strategy to grow and train Wisconsin's biohealth workforce according to current and future projected needs.

Green Ribbon Commission on Clean Energy and Environmental Innovation

Further efforts to leverage state partnerships, economic development strategies, and federal investments to ensure Wisconsin's infrastructure, workforce, and economy are built for the 21st century, is the work Gov. Evers Green Ribbon Commission on Clean Energy and Environmental Innovation to both address the climate crisis while investing in a clean energy economy that will generate thousands of family-supporting jobs, help lower energy and utility bills, and reduce the state's reliance on out-of-state energy sources. The Commission will play a critical role in creating a Green Innovation Fund to dedication resources to work toward investing in and achieving Wisconsin's clean energy goals. The Fund and its partners will leverage public and private financing to invest in projects that provide environmental and clean energy solutions to businesses, reduce pollution, lower energy costs for families, and expand access to clean, affordable energy options. In addition to private financing for the Fund, the federal Inflation Reduction Act created the Greenhouse Gas Reduction Fund and allocated \$27 billion in competitive funding for states and nonprofit entities that collaborate with community financing institutions, such as green banks, to support projects that will combat the climate crisis, invest in innovative clean energy development, and create good-paying jobs.

Transportation Infrastructure and Workforce Development

Additionally, DWD will collaborate with the Wisconsin Department of Transportation (WisDOT) the Public Service Commission, and other partners to maximize workforce development opportunities within the transportation and utilities industries, which, thanks to the large-scale federal investments, are anticipated to have significant economic impacts on the state's economy. While state agencies continue to collaborate on applying for and implementing many competitive grants, current highlights already underway include the following:

- **New Labor Development Specialist Position:** WisDOT Office of Business Opportunity and Equity Compliance (OBOEC) is utilizing BIL funds on a new Labor Development Specialist position. The Labor Development Specialist is engaged in strengthening the WisDOT Highway Construction Skills Training (HCST) program and serves as a liaison to HCST service providers, assisting with outreach, recruitment, and program improvements. The Labor Development Specialist will also help with graduate/student career placement, maintaining graduate directory information, and DWD career resource sharing.
- **Highway Construction Skills Training (HCST):** WisDOT has rebranded its skills training program, certifying the training as a pre-apprenticeship program with DWD. WisDOT has met with DWD staff to include HCST information in DWD outreach systems and ensure program

quality and consistency. In addition, WisDOT has developed video testimonials and other outreach opportunities. WisDOT has distributed educational materials to training providers and potential students. Social media and the release of other information coincides with the HCST recruitment timeline and graduation dates.

- **Highway Construction Workforce Partnership (HCWP):** WisDOT has utilized a federal grant to develop a Highway Construction Workforce Partnership, comprised of representatives from WisDOT, DWD, workforce development boards, industry associations, contractors, and other partners. Workforce Boards, Employ Milwaukee and Workforce Development Board of South Central Wisconsin (WDBSCW), completed a workforce needs assessment to help determine priority needs. That assessment identified the ability to increase resources and support through co-enrollment with other Wisconsin workforce development board (WDB) programs, utilization of Employment Training Outcomes (ETO) Database, updating Certified Pre-apprenticeship (CPA) description with DWD Bureau of Apprenticeship Standards (BAS), and requesting DWD approve Eligible Training Provider List (ETPL) inclusion. WisDOT will be working with Employ Milwaukee and WDBSCW on these recommendations. HCWP members will continue to collaborate on challenges and opportunities.
- **Workforce Board Pilot Training Initiative leveraging WIOA Funds:** Local Workforce Development Boards (WDBs) Employ Milwaukee, Inc. and Workforce Development Board of South Central Wisconsin (WDBSCW) are working with WisDOT and HCST providers to develop pilot HCST trainings that include wraparound services. Continued HCST collaboration with the local WDBs will ensure HCST Participant WIOA co-enrollment and allow use of WIOA funds for opportunities such as transportation assistance, work gear/clothing, child care, and/or student stipends. The local WDBs will also strengthen the pre-apprenticeship curriculum, recruitment, and other outreach. Continued collaboration with local WDBs and DWD will help realize these opportunities. WisDOT can utilize DWD online services to help place individuals into training programs as well as other construction career opportunities. WisDOT hopes to increase both HCST graduation and heavy highway job placement rates.
- **Construction Career Day (CCD):** The Federal Highway Administration (FHWA) Every Day Counts 7 (EDC-7) Workshop in Jacksonville in 2023 identified CCDs as an opportunity to reach high school students and provide hands-on opportunity with equipment, personal time with contractors and training contacts. WisDOT and DWD staff will collaborate on ongoing CCD initiatives to strengthen these events.
- **Women in Construction Initiative:** The EDC-7 Workshop identified an opportunity to reach out to women in construction events, including CCD and other activities. WisDOT has drafted informational materials, has completed its first woman testimonial video, and continues to explore opportunities for women in construction training and career placement.

B. STATE OPERATING SYSTEMS AND POLICIES

1. OPERATING SYSTEMS

Describe state operating systems that support coordinated implementation of State strategies (for example labor market information systems, data systems, communication systems, case management systems, job banks, etc.).

The WIOA core and partner programs collect participant data separately because of each program's unique federal requirements. The U.S. Department of Labor Employment and Training Administration (ETA) funded programs collect data on a combination of paper and electronic application forms. Reportable individuals may register for the workforce system via the state's labor market exchange, Job Center of Wisconsin (JCW) which is interfaced with the Department of Workforce Development (DWD) Division of Employment and Training's (DET) case management tool, the Automated System Support for Employment Training (ASSET). Programs collect data and staff review critical data elements with reportable individuals to assist in determining eligibility for each program. Program staff enter services, notes, and follow-up outcome information into the ASSET application. The DWD Bureau of Information Technology Services (BITS) initiated batch processes that extract participant data from source systems to make reports available in Job Center Systems 2 (JCS2) data warehouse and for the Participant Individual Record Layout (PIRL) report.

DWD's Division of Vocational Rehabilitation (DVR) collects data electronically and from paper sources, which are then scanned and/or imaged. Data are also entered directly into DVR's case management system, the Integrated Rehabilitation Information System (IRIS) such as data elements required to create purchase orders for goods or services. The data/documents also include referrals for services, data elements necessary for Individual Plan for Employment (IPE) development, case management activities and notes, medical documentation, credential attainment documentation, measurable skills gain documentation, employment documentation, service provider purchase orders, reports and invoices. Data are input and document images are stored in IRIS. Data from IRIS are extracted into the data warehouse where federal reports are created, and the DVR dashboards are populated.

Participant reports through the DWD Division of Employment and Training's (DET) Job Center Systems 2 (JCS2) support the state's strategies by providing operational data to assist staff to maintain situational awareness of their caseload.

Business Service Teams and program staff report business services into the JCW Business application. DWD BITS initiated a series of batch processes to extract data from JCW Business and to 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 coordinate integration of business services efforts.

The Department of Children and Families (DCF) collects TANF work programs data in two primary systems: CARES Worker Web (CWW) and Wisconsin Work Programs (WWP). TANF eligibility is determined and recorded in CWW. Work program case management functions, including informal assessment, collection of work history, employability planning, work activity assignment, and participation tracking 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 CWW and WWP applications.

The Department of Health Services (DHS) collects FSET program data in CWW. SNAP/FoodShare eligibility is determined in CWW. CWW also contains the FSET Tool used by FSET workers to track a participant's progress through the FSET program and perform key case management functions. The FSET tool contains information on enrollment status and dates, basic contact information that is pulled from the eligibility side of CWW, barriers, employment information and history, employment plans, monthly

participation tracking. FSET workers enter comments anytime they interact with an FSET participant or offer reimbursements for expenses necessary for program participation.

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

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

To verify the validity of data and ensure Wisconsin WIOA 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 safeguards 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 WIOA Title II participant data to data in an external data source to better understand WIOA 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 WIOA Title II providers, promotes data consistency across all Wisconsin WIOA 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 DWD's Unemployment Insurance (UI) 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 DWD to generate the data necessary to report the federally required WIOA co-enrollment rate.

Cross-agency initiatives Wisconsin will undertake in this WIOA Combined State Plan are outlined in this section. DWD continues to lead an effort to integrate a common intake and referral systems between WIOA partner programs. This work was slowed during the COVID-19 pandemic that occurred during in the last state plan period. The state will reinvigorate common intake through working on the most value-added components and scaling the solutions. The top four priorities are: 1.) cross-program data sharing efficiencies; 2.) understanding and facilitating customer movement between programs; 3.) knowledge brokering around outreach to empower staff, and 4.) constructing metrics that assess the state's progress on the WIOA Combined State Plan.

1. The state will engage in activities to create data sharing effectiveness between agencies. DWD will assist to streamline access to UI wages for WIOA partners in a systematic method to improve the

accuracy of employment outcome information. The programs will work to automate data collection utilizing administrative datasets to reduce the burden of collection on staff.

2. The state will work to understand co-enrollment and referrals between WIOA programs to optimize customer experience. The results will inform the program's ability to improve customer service and process efficiencies. The DWD-DET to DWD-DVR referral project that began in PY 2023 is a scalable start for sharing customer contact information. This sharing will allow for initial review of an impact on co-enrollment and service delivery.
3. The state will develop systems to enhance its ability to communicate evidence. The Integrated Service Delivery (ISD) Data Steward Committee with the assistance of the DWD Workforce Data Integration System (WDIS) will assist in developing knowledge brokering systems to ensure evidence is delivered to staff at the right time for implementation, global reports are delivered, and data empowerment (i.e., literacy) is incorporated into staff engagement plans.
4. This WIOA Combined State Plan will have metrics identified for each component of the plan. The metrics will be managed by the ISD Data Stewardship Committee and reported out to the ISD Steering Committee on an ongoing basis. The metrics will be developed in conjunction with the Governor's Council on Workforce Investment and partner programs. As part of these additional WIOA State Plan metrics, programs will continue to share their progress on the primary indicators of performance in WIOA Sec. 116 through a common performance report.

2. STATE POLICIES

Describe state policies that will support the implementation of the State's strategies (for example, 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 and any additional guidance for one-stop partner contributions.

Wisconsin has an Integrated Service Delivery (ISD) Policy and Guiding Principles Team comprised of staff across WIOA program partners. The purpose of the team is to help identify and approve shared policies for WIOA partners, as well as share best practices and tools to improve the customer experience with the WIOA system.

DWD's Bureau of Workforce Training issues policy guidance on an ongoing basis to support the implementation of WIOA Title I-A and I-B. All current WIOA Title I policies are available at: <https://www.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 collaborated on additional joint guidance on common intake and co-enrollment so that all partners have a shared understanding of requirements. Additionally, 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's current policy regarding co-enrollment between the Trade Adjustment Assistance (TAA) Program and Dislocated Worker programs can be found at: <https://www.dwd.wisconsin.gov/wioa/policy/13/13.1.htm>. Additionally, current policies regarding

Equal Opportunity and Performance Accountability and Reporting can be found at:
<https://www.dwd.wisconsin.gov/wioa/policy/#list-chapterFive> and
<https://www.dwd.wisconsin.gov/wioa/policy/#list-chapterEleven>.

DWD's current policy regarding the one-stop delivery system can be found at:
<https://www.dwd.wisconsin.gov/wioa/policy/#list-chapterTwo>. This includes policy regarding one-stop partners, customer populations, American Job Center Network branding, one-stop delivery system Memoranda of Understanding (MOUs), and one-stop operators. There is also current policy regarding one-stop infrastructure funding at:
<https://www.dwd.wisconsin.gov/wioa/policy/02/02.6.htm#sectionTwo>, which addresses line items that are considered infrastructure funding as well as the local and state funding mechanisms and appeals by one-stop system partners. Additional guidance for shared delivery costs can be found at:
<https://www.dwd.wisconsin.gov/wioa/policy/02/02.6.htm#sectionThree>.

The Wisconsin Technical College System (WTCS) coordinates a competitive grant process to award AEFLA funds to providers. The next grant cycle begins July 1, 2025, and run through June 30, 2029. Title II leadership is required to run a fair and equitable grant competition. Additionally, organizations who have demonstrated effectiveness are eligible to apply as a provider and must meet the thirteen considerations for funding. Once providers are selected, they are subject to ongoing program monitoring to examine the program's design, effectiveness, performance outcomes and compliance with state and federal guidelines. This also provides an opportunity for a provider to receive technical assistance from the WTCS office to strengthen programs.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. State Agency Organization

State Agency Organization. Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

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	<ul style="list-style-type: none"> • Title I: Adult, Dislocated Worker, Youth • Title III: Wagner-Peyser (Wagner-Peyser Act, as amended by Title III) • Title IV: Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV) • Trade Adjustment Assistance for Worker Program (Chapter 2, Title II Trade Act) • Jobs for Veterans State Grants (Title 38, Chapter 41)
Wisconsin Technical College System	Title II: Adult Education and Family Literacy

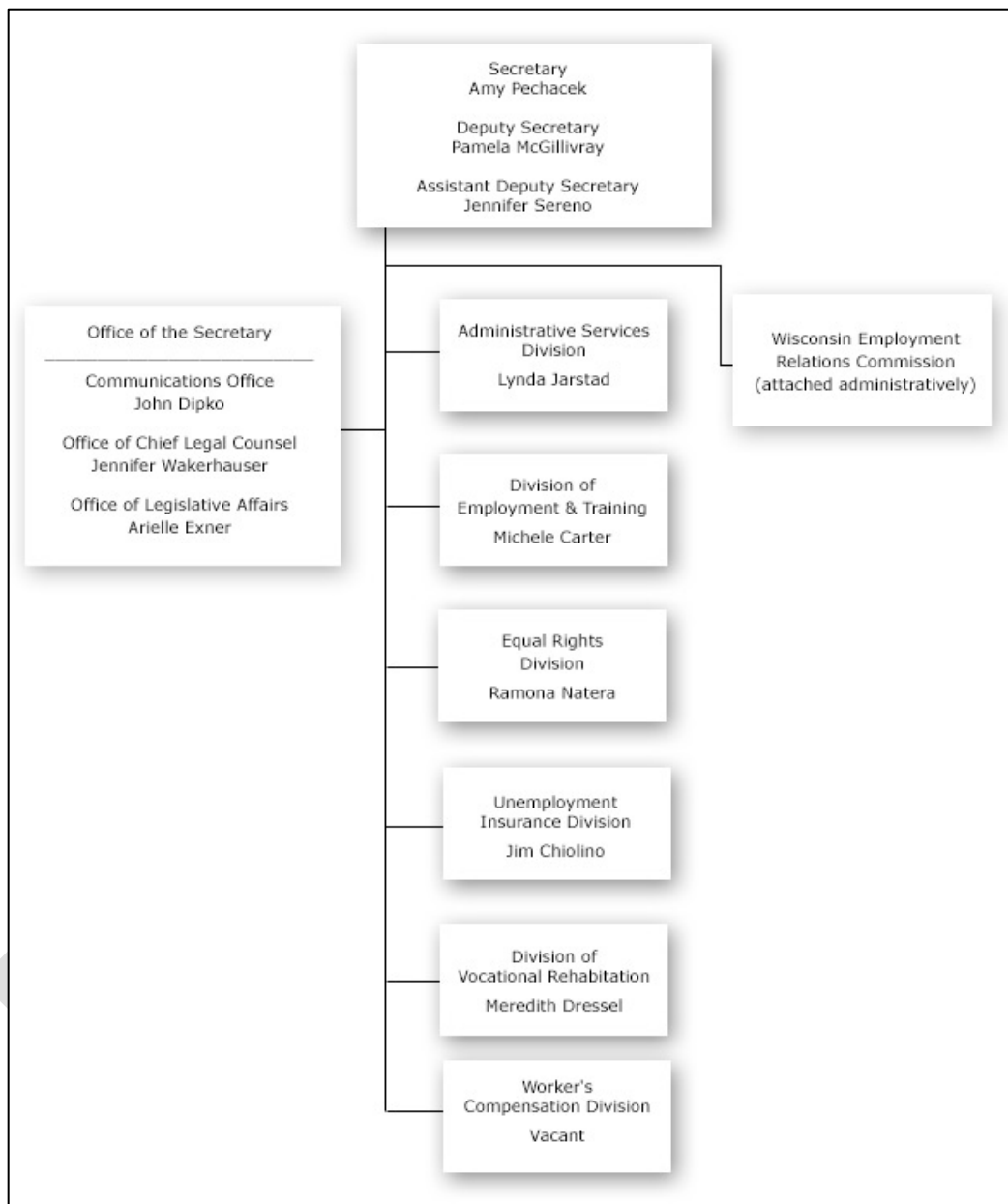
State Agency	Programs
Department of Children and Families	Temporary Assistance for Needy Families (TANF)
Department of Corrections	Reentry Employment Opportunities (REO) Program
Department of Health Services	Employment and Training Programs under the Supplemental Nutrition Assistance Program (SNAP E&T)

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 Amy Pechacek, appointed by the Governor, and Deputy Secretary Pamela McGillivray and Assistant Deputy Secretary Jennifer Sereno. There are six divisions within DWD: Employment & Training (DET), Equal Rights, Administrative Services, Unemployment Insurance (UI), Vocational Rehabilitation (DVR), and Worker's Compensation. WIOA Titles I, III, and IV are administered by DWD.

Michele Carter is the DET Administrator which has administrative responsibility for Title I programs, Wagner-Peyser, TAA, and JVSG. Meredith Dressel is the DVR Administrator which is responsible for overseeing Title IV.

Section III, Chart 1: Department of Workforce Development Organizational Chart

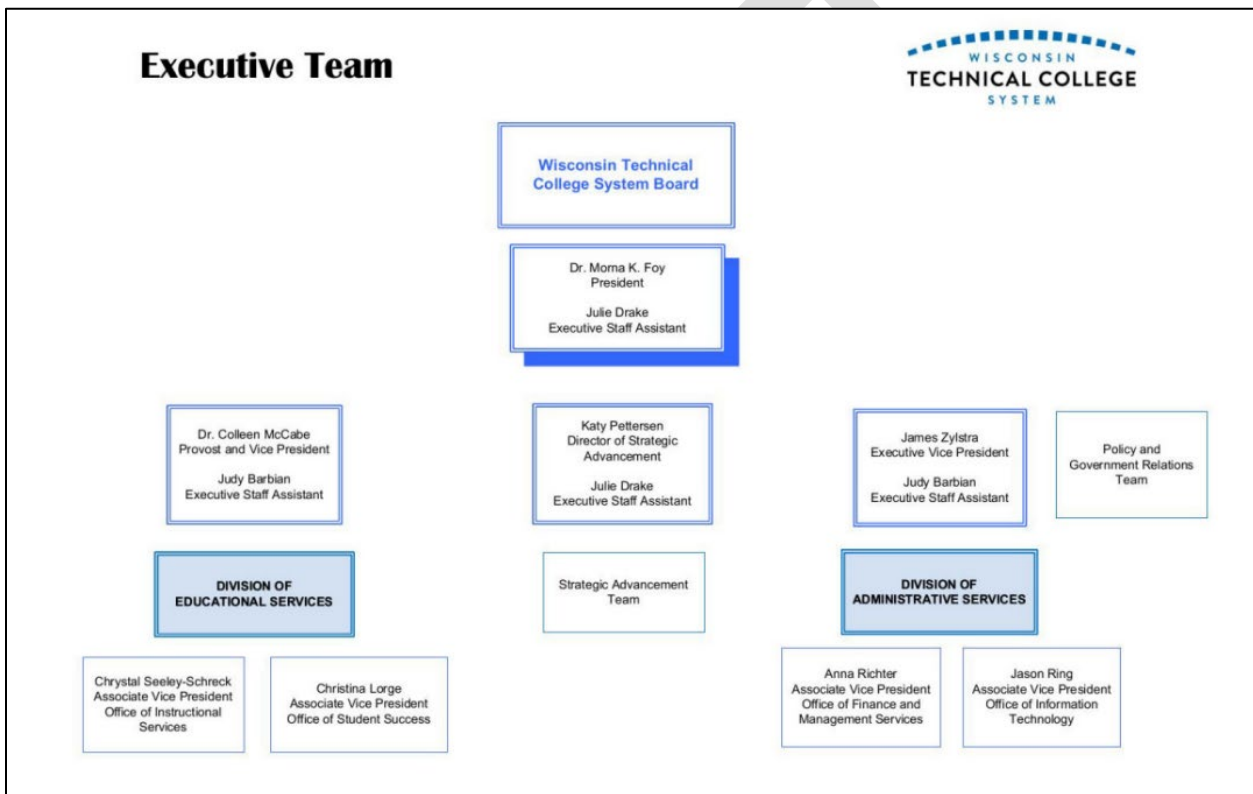


Wisconsin Technical College System (WTCS)

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.

Section III, Chart 2: Wisconsin Technical College System Organizational Chart

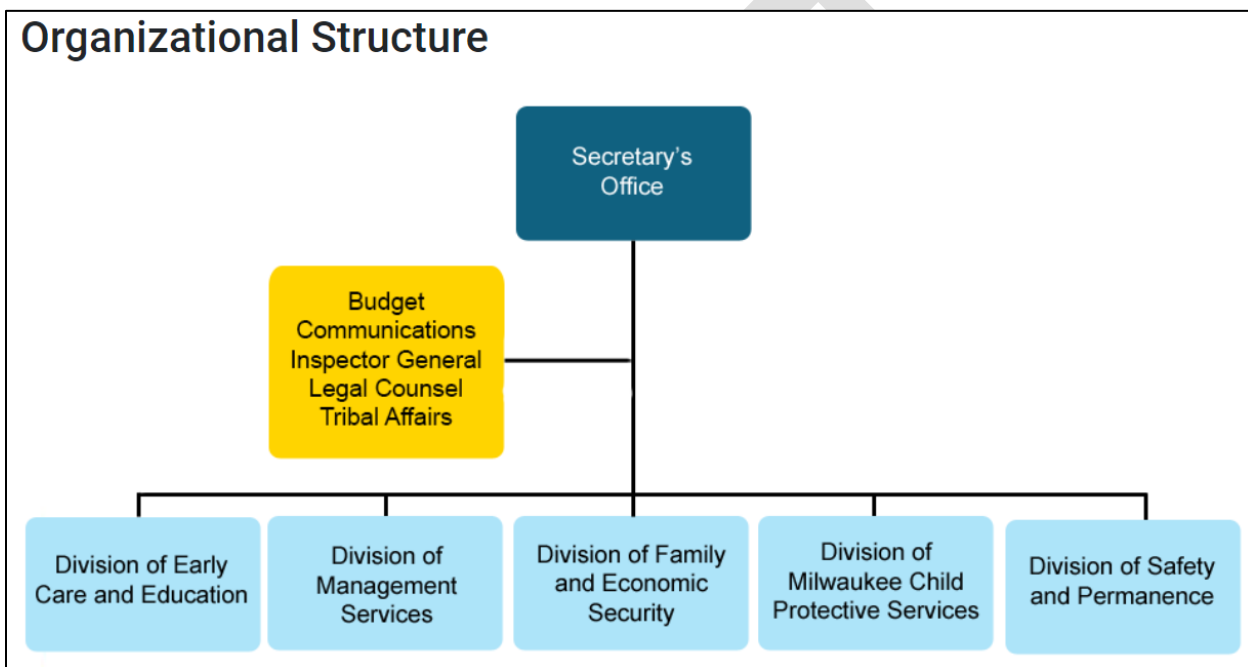


Department of Children and Families (DCF)

DCF is the state agency responsible for ensuring Wisconsin's children and youth are safe. DCF is led by Secretary Emilie Amundson, appointed by the Governor, and Deputy Secretary Jeff Pertl and Assistant Deputy Secretary Nadya Perez-Reyes. 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, Community Services Block Grants and TANF funded subsidized employment programs (Transform Milwaukee and Transitional Jobs).

Section III, Chart 3: Department of Children and Families Organizational Chart

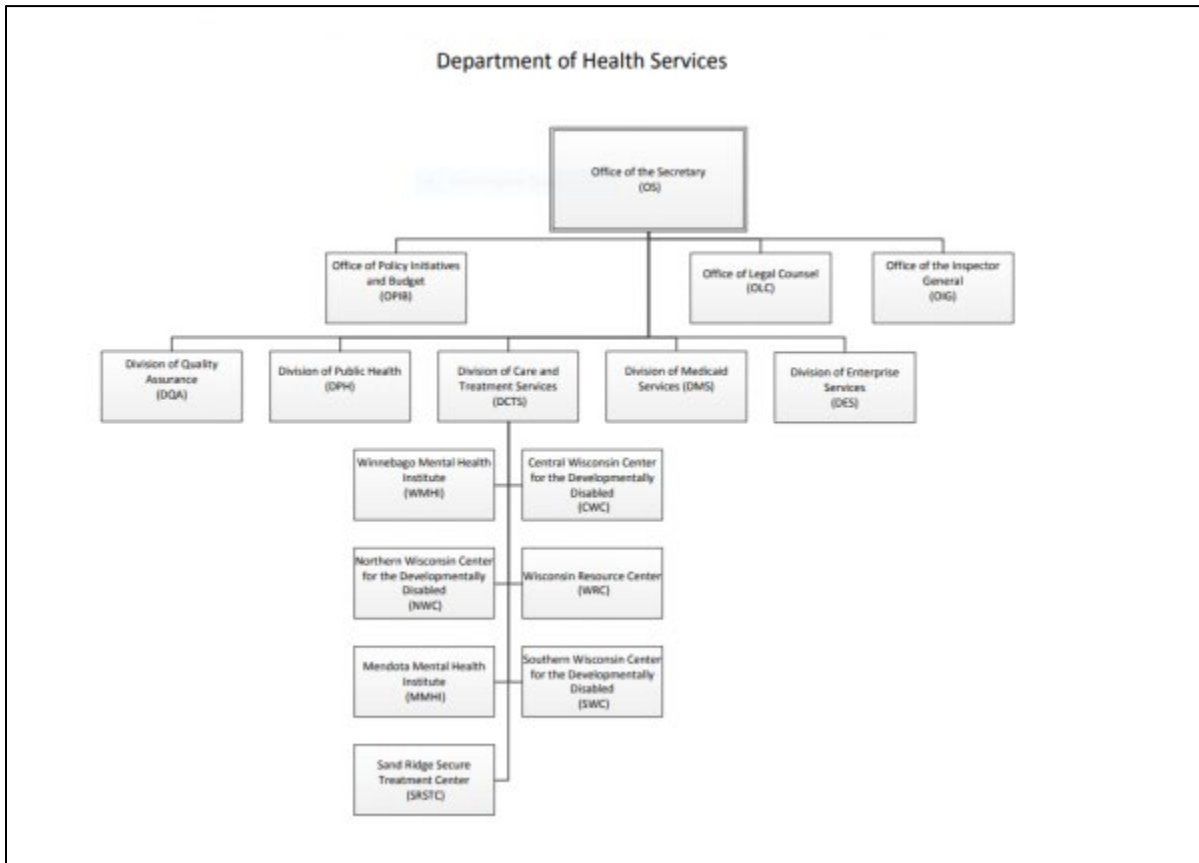


Department of Health Services (DHS)

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 Kirsten Johnson, appointed by the Governor, and Deputy Secretary Debra K. Standridge and Assistant Deputy Secretary Sarah Valencia. 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 healthcare, 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 4: Department of Health Services Organizational Chart

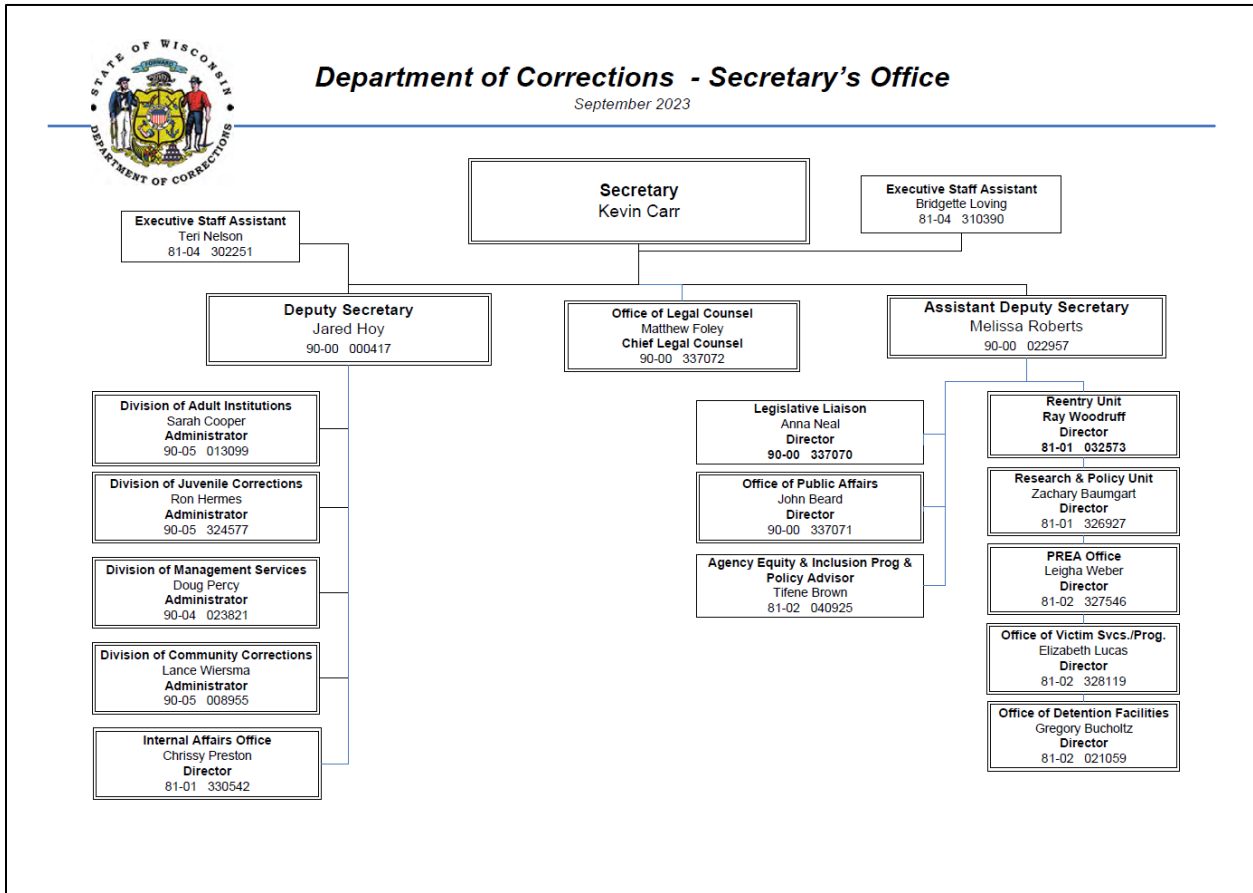


Department of Corrections (DOC)

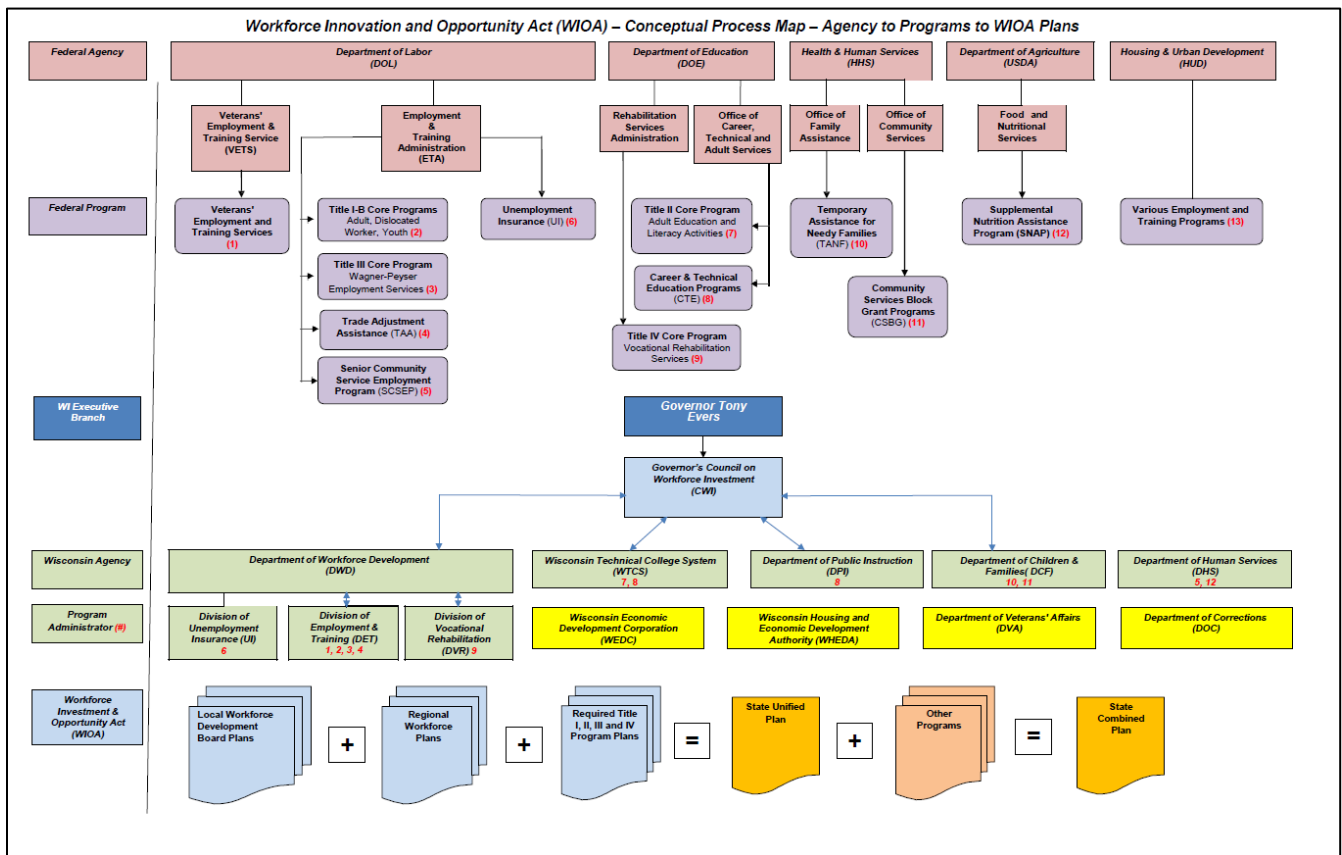
DOC is the state's public safety agency that provides care and services to approximately 23,000 individuals incarcerated in 37 state institutions and supervises over 66,000 persons on probation and parole through 131 field offices. DOC is led by Secretary Kevin Carr. The agency has four divisions: Division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

Section III, Chart 5: Department of Corrections Organizational Chart



Section III, Chart 6: Wisconsin State Workforce System Organizational Structure



B. State Board

State Board. Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.

State Board Activities

The Governor's Council on Workforce Investment (CWI) is the federally mandated state entity under WIOA that assists the Governor in developing innovative and dynamic approaches to further develop Wisconsin's workforce. The CWI is tasked with aligning Wisconsin's workforce and talent development initiatives and investments with its economic development strategies. In assisting the Governor and Legislature in carrying out their federally mandated responsibilities, the Council aids Wisconsin employers in finding the workers they need and provides resources to enable workers to access training for in-demand careers with the goal of moving Wisconsin's economy forward. The CWI was most recently reconstituted in its current form through 2023 Wisconsin Executive Order #182. The Council is administratively housed in the Department of Workforce Development (DWD). Program and policy staff

within DWD provide overall support and policy advisement to CWI members and partners on how to carry out their mandated responsibilities and offer guidance on strategic policy development to support aligned and effective service delivery.

To further advance its mission, the Council finalized its next four-year strategic plan and submitted it to Gov. Evers in May 2022. The plan outlines the key priorities and Council recommendations for outcome-based, workforce development strategies that are data-driven and reflective of employer demands. The CWI Strategic Plan is built around four key focus areas: Education, Employers, Workforce, and Organization and Resource Alignment. The four focus areas of the CWI Strategic Plan and the objectives under each focus area serve as the foundation for the PY2024 – 2027 WIOA State Plan, and the strategies and recommendations of the CWI are reflected throughout the WIOA State Plan.

The CWI maintains its strategic plan as a living document for use in continuing to shape and advance Wisconsin's workforce policies, strategies, and desired outcomes. Review and updates to the plan are a standing agenda item at Council meetings throughout the course of the plan; and the recommendations may evolve over the years to ensure they reflect input from key stakeholders and incorporate new strategies to meet the state's ever-changing workforce and economic development landscape.

Additional details on the Council's activities are available in annual publication of the [CWI Activities Report](#).

State Board Membership (Roster as of Feb. 2024)

Government Officials, State Agency, WIOA Core Program Representatives

- Governor Tony Evers
- Secretary Amy Pechacek, Dept. of Workforce Development – WIOA Titles I & III
- Secretary Emilie Amundson, Dept. of Children and Families – TANF
- Jeff Buhrandt, University of Wisconsin System / WEDC
- Dr. Morna Foy, Wisconsin Technical College System – WIOA Title II
- Dr. Eric Fulcomer, Wisconsin Association of Independent Colleges & Universities
- Secretary Missy Hughes, Wisconsin Economic Development Corporation State
- Meredith Dressel, DWD – Div. of Vocational Rehabilitation – WIOA Title IV
- Superintendent Dr. Jill Underly, Department of Public Instruction
- Sen. André Jacque, Wisconsin State Senate – Senate Majority
- Rep. Warren Petryk, Wisconsin State Assembly – Assembly Majority
- Rep. Katrina Shankland, Wisconsin State Assembly – Assembly Minority

Business Representatives

- Rebecca Bartoszek, Fox Cities Chamber of Commerce
- Shiva Bidar-Sielaff, UW Health
- Shah Haqqi, S&L Global Consulting
- Carver Harries, Ashland Area Development Corp.
- Amanda Hoefling, Dairyland Power Cooperative
- Mark Johnson, CGI Accounts
- Mark Kessenich, Associated General Contractors
- Thomas Miller, Aurora BayCare Medical Center
- Blake Moret, Rockwell Automation

- Pravin Raikar, Lockstep Solutions LLC
- Nora Roughen-Schmidt, UW System Small Business Development Center
- Kathi Seifert, Katapult LLC
- Sachin Shivaram, Wisconsin Aluminum Foundry – CWI Chair
- Ann Zenk, Wisconsin Hospital Association
- Corey Zetts, Menomonee Valley Partners

Workforce Representatives

- Lindsay Blumer, WRTP | Big Step – Joint Labor-Management Apprenticeship
- Andrew Disch, Wisconsin State Council of Carpenters – Organized Labor
- Jake Gorge, Wisconsin Literacy Inc.
- Ann Franz, NEW Manufacturing Alliance – CWI Vice Chair
- Shaun McHugh, International Union of Operating Engineers – Organized Labor
- Dan Mella, Plymouth School District
- Sara Rogers, Employ Milwaukee
- Seth Lentz, Workforce Development Board of South-Central Wisconsin – Ex-Officio Member

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

A. Assessment of Core Programs and One-Stop Partner Programs

Assessment of Core and One-Stop Program Partner Programs. Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

Core Programs

Each core program's performance in each of the primary indicators of performance is a starting point for further evaluation of the quality, effectiveness, and opportunities for improvement. Each partner program submits their performance metrics into a statewide dashboard on a quarterly basis. Each partner program reports out to the Performance Advisory Committee (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 sub-committee under the WIOA Integrated Service Delivery Data Steward Committee that is tasked with advising the WIOA Executive Committee on performance matters. The Performance Accountability Committee is led by DWD's Division of Employment and Training (DET) and includes representation from all Combined State Plan programs, local Workforce Development Boards (WDBs), and the DWD's Unemployment Insurance (UI) Division. The WIOA Executive Committee shall provide briefings on these reports to Governor's Council on Workforce Investment (CWI) for their review and action.

WIOA's primary measures of performance measure each core program's effectiveness at producing desired outcomes. 20 CFR § 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 statistical adjustment model. Therefore, the state and local areas are assessed based on a comparison of the actual performance level with the adjusted level of performance each quarter and annually. The state workforce agency will negotiate targeted levels of performance for each primary performance indicator with local areas biennially. The performance indicator threshold will be determined by DWD under the advisement of the PAC. There are multiple different levels of performance:

- The **negotiated level of performance** is the agreed upon target level of performance for an indicator set biennially.
- The **adjusted level of performance** is the result of re-calculating the negotiated level of performance for an indicator once a program year ends. This becomes the new target level.
- The **adjustment factor** is the total amount that the original negotiated level of an indicator is adjusted.
- The **actual level of performance** shows the actual reported performance results for the indicator.
- The **individual performance indicator score** is the actual level divided by the adjusted level and is the score used for performance assessment.

"Exceed"

Condition: If the individual performance indicator score for an indicator is greater than 100%, the measure will be considered to have "exceeded" the measure's threshold.

Action: Exceeding the threshold 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 continuous improvement methods, such as kaizen, process mapping, 5S, etc.

"Met"

Condition: If the individual performance indicator score for an indicator is greater than or equal to the threshold determined for the program year, this measure will be determined to have been "met".

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

"Fail/Not Met"

Condition: If the individual performance indicator score for an indicator is less than the threshold determined for the program year, this measure will "fail" the threshold outlined in 20 CFR § 677.190(d)(2). This indicates a specific indicator requires improvement 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.

Additional Metrics

In addition to the primary indicators of performance, additional 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.

One-Stop Program Partners

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 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. Combined State Plan Partner programs (Temporary Assistance for Needy Families (TANF)/Wisconsin Works (W2), FoodShare, and Reentry) will contribute current program specific performance to the assessment process. TANF will continue to assess program performance using the Work Participant Rate (WPR) metric.

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, are assessed by the WIOA primary indicators of performance. Each program has goals set through negotiation with the federal government. The actual performance on the primary indicators of performance will be assessed at the state, regional, and local levels and by service provider. The partner programs will report their performance to the PAC. The partner programs, i.e., the Trade Adjustment Assistance (TAA) Act, Jobs for Veterans State Grant, Reentry, TANF (W-2), SNAP (FoodShare) set levels with the federal government or internally.

This assessment is 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 (i.e., the Council on Workforce Investment) 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 programs.

Wisconsin's WIOA Integrated Service Delivery system is coordinating with the CWI on a project to develop a technical solution to display strategic plan metrics. The project will develop a digital product

that can be used by the CWI and the WIOA Executive Committee to examine the progress of both the CWI strategic plan and the WIOA State Plan. The benefit of this project is that it will fulfill the objective for the CWI to be data driven when considering options and deliberating on decisions. Currently, there are not any dashboards that collate information about the CWI or WIOA State Plan in an orderly fashion. The current situation causes decision makers to be in a position where they must make decisions without appropriate information. As a result of this project WIOA and CWI leadership will have visibility into the progress on stated goals. This transparency will assist decision makers to assess and make data-driven decisions to optimize the intended impacts of the efforts. The ultimate beneficiaries of this project are people in Wisconsin who are served by the public workforce system.

B. Previous Assessment Results

Previous Assessment Results. For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

The PAC used previous performance results to identify strength and weaknesses in its state strategy.

To see the results of Wisconsin's program performance please visit the websites linked below. The initial assessments were done by reviewing the WIOA Performance reports to identify areas of strength and weaknesses 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.

U.S. Department of Labor – WIOA Title I & III Programs:

- <https://www.dol.gov/agencies/eta/performance/results#WI>

U.S. Department of Education – WIOA Title II Adult Education Program:

- <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/accountability-reporting.html#spr>

U.S. Department of Education – WIOA Title IV Vocational Rehabilitation Program:

- <https://rsa.ed.gov/wioa-resources/wioa-annual-reports>

Temporary Assistance for Needy Families (TANF)

- <https://www.acf.hhs.gov/ofa/data/work-participation-rates-fiscal-year-2021>

Previously, the PAC determined credential attainment was an area of concern for the Title I Dislocated Worker and Title I Youth programs. The PAC determined 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. As a result of a later assessment, the PAC determined further training on Measurable Skill Gains (MSGs) was needed as opportunities to record MSGs were missed. In PY 2020, a webinar was held, recorded, and made available

on demand for career planners to use as a reference for tracking and recording MSGs. The state identified the Credential Attainment and MSGs continue to be indicators with room for improvement. Many trainings and technical assistance have been held in PY's 2021 and 2022 and are planned to be held in PY 2023. Policy continues to be updated to reflect clarification presented during trainings and technical assistance. In PY 2022, a new report was created and shared with local WDBs identifying which participants attained a credential but did not achieve any MSG in an effort to capture more MSGs. Providing lists of participants that are included in the denominator and not the numerator for at-risk indicators was proven to be a useful resource for local areas to improve reporting of their performance measures.

Additionally, the assessments inform joint and program specific technical assistance efforts. WIOA performance webinars have been ongoing since PY2017 with timely topics addressing findings of previous assessments. Each Title has provided more specific technical assistance (TA) to their program staff.

C. Evaluation

Evaluation. Describe how the State will conduct evaluations and research projects of activities carried out in the State under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA (WIOA Section 116(e)).

In accordance with WIOA Section 116(e), the State of Wisconsin conducts ongoing evaluations of its WIOA core programs. The Data Stewards and Evaluation and Research Workgroups, comprised of members from all WIOA core partners, established the following workplan for moving forward over the next four years with evaluation of WIOA programs:

1. With partner and stakeholder feedback, develop and prioritize learning questions and evidence gathering through a [four-year learning agenda](#) and [annual evidence plan](#).
2. Use all four methods of evidence gathering, including: 1.) foundational fact finding, 2.) performance measurement, 3.) policy analysis, and 4.) evaluation.
3. Create data-based continuous improvement loops through qualitative customer and staff feedback loops and quantitative [dashboards](#).
4. Use research and evaluation, data steward, and performance advisory meetings to learn from partner evaluations and to partner on evaluation across WIOA partners.
5. Conduct evidence gathering through internal resources and external partnerships.

DWD continues to use existing methods of evaluation such as annual compliance program and fiscal monitoring of local Workforce Development Boards (WDBs), data validation, and performance evaluation. WIOA programs are partnering with the Governor's Council on Workforce Investment (CWI) to establish performance metrics for ongoing performance monitoring and to provide feedback loop for continuous improvement.

Evidence-based policy and decision-making collaboration: The Wisconsin Department of Workforce Development (DWD) continues to expand its staff and technical research capacity. The DWD [Workforce Data Integration System \(WDIS\) website](#) includes its current learning agenda and evidence plan. The learning agenda was developed by WIOA Combined State Plan partners, with local WDBs and partner input, and informed by the WIOA Combined State Plan. The WDIS website provides links to current research, evaluation findings, and employment and training dashboards, enabling WDBs and the public to make data-informed decisions based on evidence. Further, Wisconsin program and evaluation staff work in partnership with evaluation requirements and technical assistance provided by the Secretary of Labor and the Secretary of Education under WIOA Section 116(e). Wisconsin staff frequently participate in U.S. DOL Employment and Training Administration (ETA) Regional V evaluation technical assistance meetings.

DWD has developed several tools that support evidence-based decision-making across the variety of employment and training programs. DWD constructed the Longitudinal Workforce Database (LWD) designed to integrate data from disparate sources to provide a mechanism for cross-program data sharing. Several projects use the LWD to analyze employment outcomes and co-enrollment. The IBM Identity Insight data matching tool is in implementation and aims to match data from different data sources, including DWD's Division of Employment and Training (DET), Division of Vocational Rehabilitation (DVR), and Unemployment Insurance (UI) Division.

Research

WIOA focuses on evaluation activities that go beyond measuring performance to inform WIOA Title I programs. Evaluation efforts that meet these criteria are highlighted first within this report. Performance related activities and evaluation efforts of other WIOA core programs and partners are reported after these targeted highlights.

Comprehensive Employment Planning Toolkit (CEPT) Evaluation: The CEPT Employment Plan pilot is a joint effort by the Wisconsin Department of Workforce Development (DWD)'s Jobs for Veterans State Grants (JVSG), Trade Adjustment Assistance (TAA), and WIOA Title I Adult, Dislocated Worker and Youth programs to use the same electronic employment plan tool developed in the Comprehensive Employment Planning Toolkit (CEPT) application available through the Division of Employment and Training's Application (DET APPs) portal. The CEPT includes the following tools: Employment Plan, Action Steps List, Self-sufficiency, Budget, Community Resources Search, and links to career exploration and Labor Market Information (LMI) data through [WisConomy](#). The aim of this evaluation is to answer the following research question: Does CEPT improve employment planning, participation in action steps, and use of self-sufficiency, budget, community, career exploration, and labor market information (LMI) resources?

From July 1, 2022 – Dec. 31, 2022, staff working in workforce development areas (WDAs) 5, 6, 7, and 9 on the TAA, JVSG, and Title I programs piloted the use of the CEPT. In late December 2022, a survey was administered to career planners and job center service participants (primarily WIOA Title I programs). Forty-two career planners responded, providing quantitative data with qualitative context on their use and impressions of the tools. One hundred fifteen job center participants responded to a separate survey with quantitative data on use of the different tools and their perceived effectiveness. Results from career planner and customer feedback have identified areas of needed improvement of the tool — some of which have already been implemented — and areas where additional training and/or adjusted guidelines will be useful to career planners. After the survey analysis is completed in Q2 PY2023, the results will be augmented with administrative data on performance metrics for the CEPT users to understand the impact

of the tool. Results will influence the final policy and function of CEPT once the CEPT has been updated. Based on these findings, a training will be created and provided to career planners. The findings and recommendations arising from the evaluation will be shared in a report hosted on the WDIS website and through a webinar advertised to Title I program staff, partners, and leadership.

Assessing effectiveness of services: Wisconsin WIOA Titles I, III, and IV staff partnered to conduct an internal data analysis with a subset of individuals who could benefit from WIOA Title I, III, and IV employment and training services. More specifically, analysis focused on teenagers with disabilities and their parents who received Wisconsin Promoting Readiness of Minors in Supplemental Security Income (PROMISE). Data analyses revealed youth and parents who received Division of Vocational Rehabilitation (DVR) (i.e., WIOA Title IV), or DET (i.e., WIOA Titles I and III) services had higher employment rates and wages than those who did not connect to these services. More specifically, DVR (WIOA Title IV) services were associated with higher employment rates, and PROMISE services were related to improved wages. WIOA Title I and III services were associated with even higher employment rates and wages. More specifically, youth receiving SSI were 5.5 times more likely to be employed if they received WIOA Title I Youth services, whereas their parents were 13 times more likely to be employed if they received WIOA Title III, Wagner-Peyser services and WIOA Title I Adult and Dislocated Worker services. Parents' maximum quarterly wages were \$3,000 more after receiving WIOA Title III, Wagner-Peyser services and WIOA Title I Adult and Dislocated services. Youths' maximum quarterly wages were \$2,000 higher after they participated in a youth apprenticeship. In looking at categories of WIOA Title I and IV services, the analyses showed that Job Center of Wisconsin (JCW) self-services, Title I Youth services, case management, and youth apprenticeship opportunities had the greatest increases in employment rates and wages. This study was presented to local field staff and workforce partners as part of Beyond Performance Friday series and was accepted for publication in the [Rehabilitation Counseling and Educators Journal](#).

Overall, the study showed that participants who received WIOA Title I, III, and IV services together attained better employment outcomes than those who did not receive services. The evidence supports continued collaboration. Based on these research findings, WIOA Core programs and partners can work together to set targets to increase observed co-enrollment using Wisconsin [workforce co-enrollment reports](#). These results are important but limited by a very specific population and a small sample size. Therefore, Wisconsin's Workforce Data Integration System (WDIS) Research and Evaluation workgroup is working on a follow-up research study to learn more about what demographics, employment influencers, and training services funded by different WIOA training programs predict employment outcomes for a larger more comprehensive group of job seekers.

Support to Communities Evaluation: National evaluator Abt Associates Inc., in partnership with the non-profit MDRC, is evaluating Wisconsin's Support to Communities (STC) grant. Evaluation activities include knowledge development, implementation study, analysis, reporting, rapid review of grantee materials, clarification calls, structured video interview, site visits, in-depth interviews, surveys, administrative data collection, document implementation approaches, challenges, and successes. Evaluators share information/feedback during project implementation for reflective practice. MDRC has coordinated with DWD to complete phone and written surveys with all five STC sites and DWD-DET staff. MDRC did on-site visits with workforce development areas (WDAs) 6 and 11 in June 2023 and conducted a virtual visit with DET. Topics covered included project context, grant background and goals, management/staffing, and partnerships. The period of performance for this evaluation is four years and began Sept. 2020 and will complete Aug. 31, 2024. Knowledge development was the initial evaluation task and is complete. This evaluation is currently in the implementation study phase.

Worker Connection Evaluation: Worker Connection program is funded with American Rescue Plan Act (ARPA) funds and is piloting strategies that may be adapted by WIOA Title I programs. Specifically, Worker Connection is piloting the use of targeted outreach, one-on-one career navigation service, and work advance training. The Worker Connection Program began enrolling clients in March of 2022, and 2,007 clients have been enrolled in the program within the first 18 months of the program. Within this 18-month period, 80% of Worker Connection's clients have either received a career, navigation, supportive, and/or training service and 62% of them completed a positive personal profile with their career navigator. Participants with two quarters post-entry, were more likely to have a job after participation than before with similar employer reported UI wages. Participants with a positive personal profile were even more likely to have a job with higher wages. Out of the 2,007 clients enrolled in the program, 68% occurred through partnerships with other organizations and another 10% occurred through partnership events. As a result, the Worker Connection program has been able to reach underserved populations such as individuals who are ex-offenders, homeless, and long-term unemployed. Worker Connection is also partnering with University of Wisconsin Center for Education Research to conduct a process evaluation. The evaluation will identify the key outreach, career navigation, and training services that lead to improved employment outcomes. The research plan aims to develop a fidelity model for replication and sustainment of improved employment and training services, including WIOA Title I.

Career Pathways Advancement Evaluation: Wisconsin's Career Pathways Advancement (CPA) Initiative is funded by the Rehabilitation Services Administration (RSA) Disability Initiative Fund (DIF). Wisconsin's initiative uses career pathways for career advancement, with the aim to improve employment outcomes for people with disabilities and connect vocational rehabilitation (VR) consumers to high quality, high demand, local jobs. In addition, the grant aims to increase the number of people with disabilities who connect to trainings in manufacturing, construction, digital technology, and healthcare career pathways. The Career Pathways project evaluation goes beyond Division of Vocational Rehabilitation (WIOA Title IV) consumer services and outcomes to include additional WIOA Title partners (including WIOA Title I, II, and III). The evaluation includes co-enrollment across WIOA Title partners, to encourage coordination of career pathways services and increase inclusivity of people with disabilities.

As of September 30, 2023:

- 161 of 501 DVR CPA participants (or 32%) were co-enrolled in another WIOA or partner program.
- 149 were co-enrolled in WIOA Title III job center services,
- 37 were also an Unemployment Insurance (UI) claimant with 14 co-enrolled in Reemployment Services and Eligibility Assessment (RESEA),
- 31 were co-enrolled in WIOA Title I services (20 Title I Adult, 9 Title I Youth, and 5 in Title I Dislocated Worker),
- 8 in Youth Apprenticeship programs, 3 in Registered Apprenticeship programs, and
- 2 in Wisconsin Fast Forward.

Already, 90% started training in their chosen career pathway, and 40% have obtained a measurable skill gain and/or credential. Researchers will also determine if these career advancement strategies lead to increases in healthcare, digital technology, construction, and manufacturing jobs; increases in wages, hours worked per week, and employer benefits; and decreases in public benefits.

Coleridge Democratize Our Data Challenge and USDOL Grant for Promoting Equitable Access to Unemployment Compensation Programs (UI Equity Grant): The Coleridge Democratize Our Data Challenge and UI Equity grant focus on the use of dashboards that identify unemployment insurance (UI) claims, stay rates, and reemployment trends by industry, occupation, demographics, and location to improve data tracking. The information will inform how local Workforce Development Boards, businesses, and service providers provide career and training supports to job seekers and workforce supports to employers. The Coleridge Democratize Our Data Challenge included an Applied Data Analytics class in the summer of 2023. DWD staff, WIOA programs and partners accessed and analyzed data to answer relevant workforce development questions to improve workforce development services consistent with unemployment trends.

DWD will partner with UW-Madison Institute Research on Poverty (IRP) to complete the objectives in the Equity grant to achieve these purposes:

1. Analyze UI wage record, UI benefit claim, and Directory of New Hire (NNH) datasets to examine potential inequities regarding delays in the process of filing UI claims, getting UI claims certified, and receiving initial UI benefit payments. These analyses will also support development of a method to identify eligible non-claimants, and other analysis topics as determined by DWD and IRP.
2. Match data from DWD and administrative data from other Wisconsin state agencies and public benefit programs collected in IRP's Wisconsin Administrative Data Core (WADC). Analyses with these matched data will be used to further understand inequities in benefit pursuit and receipt, and potential obstacles and delays in the UI claims processes. Importantly, the additional administrative data can also be used to identify differences in characteristics between claimants and eligible non-claimants.
3. Work with the UW Survey Center to further explore UI claimant experiences, including potential barriers to equitable UI benefit receipt and potential levers for improving service delivery.
4. Review the results from each task to translate findings into a final report including implications for policy and service delivery practices, for both unemployment services and American Job Center partner strategies, to ensure effective, efficient, and equitable unemployment to reemployment services for all.

Labor Market Information research and reports: Wisconsin continues to provide updated Labor Market Information (LMI) on [WisConomy](#). [New tools](#) on WisConomy include award winning county profiles, updated projections, hot jobs by workforce region, affirmative action reports, degree completion dashboard, and career pathways resources. As employers look to hire a more diverse, inclusive, and equitable workforce, they can use [WisConomy's Affirmative Action dashboard](#), which provides median earnings by demographic from the American Community Survey (ACS) both statewide and by county. LMI staff also provided support to develop the [DWD Career Pathways website](#), so job seekers can navigate LMI as they explore occupations in sixteen career clusters by education level. The website links users to local trainings for each occupation, apprenticeship opportunities, as well as information about the occupation on the Job Center of Wisconsin's [Skill Explorer](#), which includes information on local job openings, related job openings, and as well as median and range of earnings for each occupation.

LMI staff also collaborated with WIOA Title I, III, and IV staff to build resource mapping for [Wisconsin Workforce grants](#) and [financial capacity building services](#). Wisconsin has a variety of grants that are short term funding to train skills employers are seeking and struggling to find. For example, there are

Workforce Innovation Grants funded through the American Rescue Plan Act (ARPA) that can be viewed by [clicking on the badger bounce back link](#). This is just one subset of different training grants available. To get information on all workforce funded training grants, DVR career pathways staff, with the input from DET staff, compiled a list of training grants on a SharePoint site. The list includes grant name, funding source, industry training areas, counties where training is available, and other relevant information about the training. LMI staff connected the SharePoint site to a [dashboard](#) that allows counselors and job seekers to search for available trainings by county and industry area. In addition, career pathways staff mapped local financial capability trainings with the aim to help consumers manage their budget and finances to increase the likelihood that career advancement will lead to increases in overall income and assets.

RESEA Evaluation: In Wisconsin, the Re-employment Services and Eligibility Assessment (RESEA) program is administered by the Bureau of Job Service (i.e., WIOA Title III Wagner-Peyser) within DWD. Job Service contracted an outside evaluator, Actus Policy Research, LLC, to conduct a confirmatory impact, exploratory, and process/implementation analysis. The research study aims to confirm the RESEA program increases participation in employment and training services, improves employment outcomes, and reduces the duration of Unemployment Insurance (UI) benefit receipt and the total amount of benefits collected. Further data analysis will explore if an additional RESEA session enhances program impacts and if program effects vary by region, participant characteristics, and/or online assessment scores. The researchers are also implementing a process analysis with an aim to learn if RESEA services are implemented consistently across regions and across participant groups, and if any observed differences are associated with different outcomes. Random assignment started April 2022 continued through the Fall of 2023. Researchers completed two annual evaluation reports, and have determined random assignment is indeed random, and enrollment numbers are projected to be sufficient to detect differences between groups. As of August 2023, researchers found RESEA led to increases in access to job counseling services, as well as statistically significant decreases in the number of benefits weeks collected, benefit amount collected, and proportion of claimants with exhausted benefits. Future evaluation will include calculating the impact of one or two sessions of RESEA on employment outcomes. [Previous Wisconsin Reemployment and Eligibility Assessment \(REA\) research was published in 2019.](#)

Title IV Evaluation: In addition to the Career Pathways Advancement evaluation, Wisconsin's WIOA Title IV, Division Vocational Rehabilitation (DVR), continues to engage in evaluation activities in data partnership with the Department of Public Instruction (DPI) and Department of Health Services (DHS) with the aim to track and monitor competitive integrated employment (CIE) for individuals with disabilities who receive publicly funded community services. See most recent data available on the [CIE website](#). DVR is also partnering with the University of Wisconsin – Milwaukee to implement changes based on the findings from [focus groups with Milwaukee consumers with diverse backgrounds](#). These focus groups, founded through partnership with the national Vocational Rehabilitation Technical Assistance Center for Targeted Communities (VRTAC-TC), provided recommendations on improved outreach and engagement with local adults with disabilities from diverse backgrounds looking for support to get a job, keep a job, or get a better job.

DVR completes a Comprehensive Statewide Needs Assessment (CSNA) every three year as required in the Rehabilitation Act of 1973, as amended. The CSNA informs the State Plan and is the basis for state plan goals, objectives, and strategies. DVR staff, consumers, service providers and WIOA partners provide input for the assessment. The most recent CSNA was completed in December 2021. DVR next CSNA will be completed by December 2024. DVR uses the state's procurement process to identify a vendor to conduct the assessment.

Additionally, DVR has a Quality Assurance Team and several program and policy analyst positions that focus on reviewing DVR cases, processes and policy documents, as well as work performed by DVR service providers to ensure state and federal requirements are being followed and to identify areas for change or improvement. DVR also has a Program Evaluation and Quality Assurance Advisory Committee that identifies potential quality issues and program evaluation/research studies needing to be conducted.

WIOA Title II Action Research As Wisconsin engages in conversations on how to better link education, training, and employment services with outcomes data, partners from the various relevant state agencies continue to meet and share findings from different evidence gathering activities and explore ways to link the [Wisconsin student longitudinal data system \(SLDS\)](#) and the longitudinal workforce database (LWD). Wisconsin's Title II partners report findings publicly on the [Wisconsin Technical College System \(WTCS\) Action Research webpage](#). Research briefs include findings on equity, changes since COVID-19, Measurable Skills Gains, career pathways, and more.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

A. Title I Programs

For Title I programs, provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for

- (i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3)*
- (ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3)*
- (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 "Operational Guide to Develop the Annual Allocations for Workforce Development Areas" in the appendix.

B. Title II

For Title II –

- (i) Describe the methods and factors the eligible agency will use to distribute title II funds.*
- (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.*

The WTCS awards funds to eligible providers who have demonstrated effectiveness in providing adult education and literacy activities. Local grants will continue to 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;
- Assist immigrants and English language learners to improve reading, writing, math, speaking, and comprehend the English language and acquire understanding of American government, individual freedom, and responsibilities of citizenship; and
- Assist in the attainment of high school equivalency, and transition to post-secondary education and training or employment. Beginning, intermediate and advanced courses include a curriculum in listening, speaking, reading, and writing using the English language. Courses integrate and contextualize digital literacy and may include elements such as instruction in life skills, civics, workplace literacy, employability skills or career exploration. Student levels are based on proficiency as measured by state approved standardized assessments.

Eligible providers who are awarded funding will follow all required AEFLA curricular and programmatic component expectations, including making sure their workforce/integrated instruction follows the WTCS curriculum standards in English, language arts, mathematics, and English language acquisition. 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. Eligible providers will be required to participate in all required WTCS 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 will include Wisconsin adult education, literacy activities, family literacy activities, English language acquisition activities, Integrated English Literacy and Civics Education, workforce preparation activities, correctional education re-entry activities, and Integrated Education and Training. WIOA Title II funding is approved and overseen by WTCS staff, which includes, the state's Adult Education Director and designated staff for adult education, English language learning, corrections and re-entry, program strategy and improvement, and the WTCS Board.

Activities funded under WIOA Title II will be undertaken by any eligible provider or combination of eligible providers. All Title II applicants will 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.

Open grant competitions will be held every four years. In 2020, the WTCS held an open competition with funded activities starting on July 1, 2021. Open grant competitions for 2026-2029 will be conducted in the same manner and format. The open competition recognizes the broad array of eligible applicants and emphasizes partnerships and career pathway-centered collective efforts whenever possible.

All Title II grant categories will be open in a direct and equitable manner as per WIOA and Department of Education requirements. The funds are made available through a competitive application process. These funding opportunities are posted on the agency website, shared through regional media, and posted on the state's Public Notices informational website.

All grant awards will be made to eligible providers in accordance with 34 CFR 463 subpart C. Any organization that has demonstrated effectiveness in providing adult education and literacy activities is eligible to apply for a grant. To demonstrate effectiveness, applicants will be required to provide

performance data on its record of improving the skills of eligible individuals and outcomes related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education or training.

Grants will be competitively awarded on a four-year basis, with updated applications due each year. Each eligible provider seeking a grant will be required to provide a description of how funding will be spent consistent with the requirements of Title II of AEFLA including administrative costs, a description of any cooperative arrangements with other partners, a description of how services are in alignment with the local Workforce Development Board plan, a description of how the applicant will meet performance targets across the WIOA primary indicators of performance, how the applicant will fulfill the appropriate one-stop partner responsibilities, how the applicant will provide services to meet the needs of learners in the area, and other requirements under 34 CFR 463 subpart C.

The competition review panel will be composed of individuals selected for their experience in the fields of adult and postsecondary education, training, and workforce development. This panel will be trained by the WTCS Grants Management team prior to the review and scoring of applications, which are based on the criteria in the WTCS Application Scoring Rubric. Applications are first reviewed to determine if the applicant meets the definition of an eligible provider of demonstrated effectiveness. If they do not meet this standard, the application will not be scored.

All applications will be evaluated using the same scoring criteria. These criteria will be aligned with the 13 considerations for funding applicants who have demonstrated effectiveness, including:

1. The degree to which the eligible provider would be responsive to regional needs as identified in the local workforce development plan;
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 § 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, as well as the activities and services of the one-stop partners;
5. 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;
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 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, 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 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 2024 for the next four-year grant cycle.

WTCS will continue to ensure that all eligible providers have direct and equitable access to apply for multi-year grants by posting guidelines utilizing various regional and statewide media, the agency's website, and posting to 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.

C. Vocational Rehabilitation Program

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

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

- (i) *Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.*
- (ii) *Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.*

The state will strive to make the management information systems interoperable through data governance, projects to share information that drive improved outcomes, data integration through the construction of cross program reports, automated gathering of data, and support to program evaluations.

Data Governance: Wisconsin WIOA State Plan partners have an established framework of data governance for joint projects to support a workforce system in alignment and one that provides an efficient, seamless customer experience.

The governance is established in the Integrated Services Delivery (ISD) structure. The purpose of the governance is to ensure WIOA data is trusted, understood, meets business needs, and provides accountability to the system rules and policies.

ISD Data Steward Committee: The ISD Data Steward Committee will execute projects outlined in annual plans approved by Wisconsin's WIOA leadership. Specifically, the Data Steward Committee will ensure this state plan has the appropriate metrics to allow assessment of the progress on the plan, assess frontline-staff data needs and uses, and define common data use cases that enhance program operations and customer outcomes.

Policy and Guiding Principles Team and Communications Team: These teams may drive additional business requirements for data and IT solutions. 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.

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 ISD Management Team establish the voting structure to approve collaborative IT work.

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

1. **Share 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 short-term goal is for this system to support appropriate sharing of individual program information between staff for co-enrolled individuals in some programs.
 - In all cases where personally identifiable information (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 the customers are not only made aware of the sharing, but also have the option to opt in or out of sharing at this level.
2. **Support data integration to create cross program reports.** The specific reports are controlled by the ISD Management Committee to plan, coordinate, and complete work on any statewide combined data reports. An 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.
 3. **Support 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 specific intake and/or outcome required data elements.
 - Participating partners will automate some core program elements. The next step will be to work with other state agencies to automate other sources of information.
 4. **Support program evaluations.** This not only includes making data available for research, but also to establish processes for requesting, approving, and completing evaluations to identify effective interventions and successful service strategies.
 - The DWD Workforce Data Integration System (WDIS) in conjunction with external researchers and WIOA partners will evaluate WIOA state plan activities. WDIS provides the capacity to:
 - Make evaluations easily repeatable and efficient;
 - Allow 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 such as, Registered Apprenticeship and Youth Apprenticeship programs and the Wisconsin Fast Forward program.
 - Establish governance processes to request and approve data for evaluations or research, and a process to review and approve the findings prior to publishing.

Linking Data: The ISD system uses various methods to link data between disparate datasets to facilitate the above projects. DWD procured a license for IBM Identity Insight, a tool that matches individuals between different source systems. This matching solution does not require the gathering of the same PII type or format, and it is not dependent on Social Security Number collection. The matching tool uses sophisticated algorithms and the most up-to-date name matching technology. It may be used, as appropriate and allowed by data security rules, policies, and data sharing agreements, between participating agencies' data systems to provide links between individual source system records to support data sharing in both reporting and real-time applications. Programs that match with the UI Wage

records utilize a match with Social Security Number. Programs match with other systems through a combination of data elements to retrieve needed administrative data elements.

Below are the IT projects currently planned for the Wisconsin WIOA "Common Intake" System:

- Partners may identify whether a customer is working with another program by utilizing data matches between case management systems.
- Partners may track electronic referrals between their programs.
- Partners may collect and share basic customer information to help streamline the customer experience for customers who work with multiple programs.

The ISD Data Stewardship Committee will identify reliable data sources from administrative datasets and how collected program data may be reused to automate collection of required data elements to improve data quality, reduce customer, and staff burden.

(iii) Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals.

The Governor's Council on Workforce Investment (CWI) strategic plan has identified metrics to assess the progress of its plan implementation. These metrics will be utilized in conjunction with the metrics developed around the WIOA State Plan to provide an assessment of the state's progress on the strategic plan.

Wisconsin intends to identify and address the organizational and structural changes necessary for the state's WIOA system to improve collaboration and accountability. Core and Combined State Plan partners will evaluate existing partnerships and collaborations in the workforce system to discover where there are gaps as well as opportunities for additional collaborations (i.e., determine where there needs to be collaboration where there currently is none and decide what additional collaboration is needed and how it needs to be done). This evaluation will include developing key performance indicators and collecting baseline data on customer satisfaction/outcomes for related accountability measures. It will also involve creating a common intake standard operating procedure for how referrals are processed and tracked across programs. Instructions on the standard operating procedures for common intake and referrals will be included in the local planning guides and Memorandums of Understanding for local Workforce Development Board plans.

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.

As indicated in the weaknesses described in section II(a)(2), workforce system staff would benefit from increased knowledge of partner programs. The results of the business climate survey conducted by the CWI reveal the employer community would also benefit from increased knowledge of WIOA partner programs. An objective of the core and Combined State Plan program partners to address this weakness is to create an effective state and local partner communication strategy to increase awareness of workforce

services among staff and employers. A preliminary step in developing the communication strategy will focus on identifying target audiences for different services and establishing appropriate communications methods based on the audience type (e.g., employers, educators, job seekers, etc.). Further, the standing committees of the CWI will be engaged in coordinating the communication strategy to ensure the messaging is aligned but appropriately tailored to match each committee's focus area with respect to employers, education, or workforce.

Sharing programmatic and performance information is a challenge in Wisconsin's workforce development system, which is why the state is taking action to enhance communication and build stronger, more coordinated relationships between state and local workforce partners. The CWI intends to address the issues related to the sharing of information across programs by developing additional strategies on how to consistently collaborate and share information among stakeholders. Members of the CWI are taking actions to develop communications that explain how to collaborate and inform stakeholders about the WIOA programs. To accomplish this, the CWI members will determine how to purposefully share information with a program point of contact that can effectively and efficiently distribute it throughout their network. They will also use their influence to access statewide organizations and local chambers across the state to distribute the messages.

The CWI is also examining methods to maintain strong collaborations and shared accountability for performance between traditional WIOA partners as well as improve collaboration with additional partners. Examples of short-term methods the CWI will take to enhance these collaborations are:

- Inviting new or potential partners from relevant stakeholder groups to participate in the CWI meetings to encourage the regular sharing of information,
- Identifying best practices for integrated service delivery across the state and local workforce development areas,
- Capturing examples of innovative collaborations worth highlighting and then sharing the best practices, and
- Incorporating those examples and best practices into the long-term communication strategy.

The CWI standing committee dedicated to WIOA compliance and resource alignment will serve as a resource to help showcase the benefits and successful outcomes from stronger, coordinated relationships. Following the development of the communication and collaboration strategies, the CWI will formalize the best practices for collaboration – such as tools for developing policies, MOUs, and effective procedures that can be easily replicated – and promote those best practices statewide. Once the best practices have been distributed statewide, the CWI will measure how successfully the practices were implemented and the outcomes to determine if those methods can be continuously utilized statewide and whether different practices are more effective for different regions of the state.

(iv) <i>Describe the State's data systems and procedures to produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).</i>
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State and Local Federal Report

WIOA Title I, III, Jobs for Veterans Service Grants (JVSG), and Trade Adjustment Assistance (TAA) programs report via the U.S. Department of Labor's (USDOL) Employment and Training Administration's (ETA) Participant Individual Record Layout (PIRL). The PIRL file extract is constructed and 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 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 (UI) wage records and from the Wage Record Interchange System (WRIS), and when available, the State Wage Interchange System (SWIS) for out of state UI wage records. Educational data from the National Student Clearinghouse augments career planner reported credential and enrollment information. The PIRL is extracted after a quarter ends and then upon request until a final PIRL file is submitted for certification. The PIRL is submitted to USDOL's Workforce Information Performance System (WIPS). Upon successful passage of the file, the WIOA Title I, III, TAA, and JVSG directors must approve the report 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.htm#sectionNine>). 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 Wisconsin Department of Public Instruction (K-12), and the state UI 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 WIOA 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, the Integrated Rehabilitation Information System (IRIS), for data collection which incorporates data validation rules to ensure accuracy. IRIS interfaces with the state's UI wage records system and the State Wage Interchange System (SWIS) to retrieve employment and earnings data elements for the purposes of Federal reporting. DVR also utilizes a data-exchange with the National Student Clearinghouse (NSCH) to assist with Credential Attainment Rate (CAR) reporting.

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

B. Assessment of Participant's Post-Program Success

Assessment of Participants' Post-Program Success. Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The core programs will use Unemployment Insurance (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 characteristics of good jobs that help workers achieve economic stability and mobility, while prioritizing diversity and worker voice. 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 publishes results and reports on its WIOA Performance SharePoint site and is in the process of developing a common dashboard that will be published publicly. Core and Combined State Plan 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. WIOA indicators of performance will also be incorporated into the Wisconsin's Governor's Council on Workforce Investment metrics.

C. Use of Unemployment Insurance Wage Record Data

Use of Unemployment Insurance (UI) Wage Record Data. Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

Systems will support exchanging data in order to meet federally required reporting – the specifics of which are detailed in data sharing agreements (DSAs) and memorandums of understanding (MOUs)

executed by involved parties that exchange this data for WIOA federal reporting. One example of this data exchange is co-enrollment reporting. As part of Wisconsin's WIOA efficiencies project, Wisconsin's Department of Workforce Development (DWD) is working on establishing terms of use for data exchanges and other reports between current participating partners, and potential new Combined State Plan partners.

Another example of this reporting is the collaborative data sharing between the Wisconsin Technical College System (WTCS) and DWD to produce the needed information for the Eligible Training Provider Lists (ETPL). 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 DWD will append with UI wage information. This information, together with WIOA participant data, will be combined behind the scenes to create easy-to-read report cards on the training providers. These systems were developed and released into production as a result of prior WIOA State Plan initiatives. An IT enhancement is now underway that includes a component to improve and clarify the displaying of enrollment, completion, and employment outcomes for the all-student data DWD receives from training providers participating on the ETPL so that users (such as staff, participants, and the public) can easily comprehend the report card data without the need for further explanation or instruction.

The core programs will continue to utilize quarterly UI wage records for performance accountability, evaluations consistent with federal and state law, through DSAs. DWD's Unemployment Insurance (UI) Division currently has DSAs for such purpose with the DWD Divisions of Employment and Training (DET) and Division of 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 also utilize the State Wage Interchange System (SWIS) for out of state records. 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 Workforce Data Quality Initiative (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 conduct program evaluation and research and build evidence for policy and program development.

D. Privacy Safeguards

Privacy Safeguards. Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

DWD and WTCS are required to safeguard data and information collected under their programs that contains confidential and/or personally identifiable information (PII). This includes programs under Titles I, II, III, and IV and other required one-stop partner programs. Federal and/or state law, workplace rules, and policy have promulgated data and information controls that are designed to protect confidential information throughout its lifecycle, from collection to final disposition.

Security controls govern processes, procedures, data systems, information release, and audits. Security standards apply to all users who have access to data and workforce information systems, including State

of Wisconsin staff, agency partners, vendors, and/or contractors who provide workforce development services. State agencies have policies and procedures in place to ensure and enforce coordination, compliance, organizational roles, physical security of equipment, logical computer access control, confidentiality, and information security.

The exchange and reuse of collected data between partner agencies is governed by applicable federal and state laws. Data sharing (or data exchange) agreements are signed by authorized representatives of the agency to codify the exchange of information between systems and parties. Data sharing agreements outline data use authorizations, limitations, privacy preserving requirements, and breach notification procedures.

7. PRIORITY OF SERVICE FOR VETERANS

- (A) Describe how the State will implement the priority of service provisions for covered persons in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor.
- (B) Describe how the State will monitor priority of service provisions 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 (DWD). 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 (DOL). After receipt of state policy, local areas are required to develop internal veterans' Priority of Service policies and implement them in their local plan. At minimum, these plans are reviewed at least once every two years for compliance with this requirement. The Priority of Service regulations require that local American Job Centers (AJCs) 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 the 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.

Veterans or covered persons who enter Wisconsin's workforce via the Job Center of Wisconsin (JCW) online are made aware of their entitlement to Priority of Service by the Veteran Services tab and <https://dwd.wisconsin.gov/veterans/> webpage. The webpage advises veterans of their entitlement to Priority of Service and directs them to speak with workforce center staff for additional information.

The job center locations that operate programs which deliver services to the general public apply Priority of Service for veterans and eligible spouses over all other program participants. The primary universal access services are the "basic career" 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 application 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 applied by providing training, technical assistance, and monitoring accomplished by the Local Veteran Employment Representative (LVER), DWD-DET Monitors, State Veterans Program Coordinator, District and Regional Job Service Directors, and Veteran Program Managers. Methods and means used to verify whether Priority of Service is being provided will include, 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 a significant barrier to employment (SBE) to DVOP specialists, the local AJC staff are responsible for providing an initial assessment at the physical workforce center point of entry. This assessment is typically conducted by WIOA Title III Wagner-Peyser program staff. The referral process 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 Disabled Veteran Outreach Program (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 individual 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 priority 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 for the employer to expand the hold beyond 24 hours. Registered veterans using Job Center of Wisconsin, whether in a job center or on the internet, can view jobs during the 24-hour Veteran's Priority hold period. This allows veterans who have the required skills and meet the required qualifications to apply for and/or contact employers prior to other candidates.

Employers registered on JCW can also conduct a candidate search and filter results for veterans. Registered veterans are indicated by an American flag icon on the results grid. This allows employers to identify and contact suitable veteran candidates prior to posting their positions to the general public.

(C) Describe the triage and referral process for eligible veterans and other populations determined eligible to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Position.

The workforce system and other program operators will enable veterans and eligible spouses to self-identify at the point of entry to the system or program and veterans and eligible spouses will be given the opportunity to take full advantage of the priority of service.

A triage approach will be used to identify veteran status and/or status of veterans with a significant barrier to employment (SBE). A triage questionnaire is added to the online Job Center of Wisconsin registration process which determines veteran status, status of an eligible spouse of a veteran, or family care giver of wounded, ill or injured service members. The system identifies those determined to have a significant barrier to employment and notifies the Disabled Veteran Outreach Program (DVOP) staff or the consolidated staff of the individual's registration and eligibility for DVOP services. This process is useful as some individuals register for services without entering the job center.

In addition, a paper triage form containing all questions used to determine veteran status and eligibility for DVOP service is available at intake for self-identification for those individuals that do not use the computer registration. Only those eligible individuals identified to have a SBE are referred to the DVOP or consolidated staff person for individualized career services.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

The one-stop delivery system's compliance with Section 188 of WIOA and applicable provisions of the Americans with Disabilities Act (ADA) are ensured through the State of Wisconsin Department of Workforce Development's (DWD) Nondiscrimination Plan, as required by 29 CFR § 38.54. The current Nondiscrimination Plan is effective January 1, 2024, through December 31, 2025, and is reviewed and updated every two years as required by 29 CFR § 38.55(c).

All contract awards made by the Department of Workforce Development (DWD) Division of Employment and Training (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.

Additionally, the DWD Deputy Secretary is the State Equal Opportunity (EO) Officer. The State EO Officer has delegated responsibilities to staff within the DET Bureau of Workforce Training (BWT). The BWT EO Officer:

- Administers an Equal Opportunity Program which ensures that the State of Wisconsin complies with applicable federal and state nondiscrimination laws, statutes, and regulations covered under WIOA and employment and training legislation. This includes knowledge of a complex matrix of equal access laws and regulations, such as Americans with Disabilities Act of 1990, laws related to welfare, veterans, Limited English Proficiency (LEP), Vocational Rehabilitation, Unemployment Insurance, Vocational Technical and Adult Education, Apprenticeship Standards and Workers Compensation.
- Develops, authors, implements, and monitors Wisconsin's Nondiscrimination and Equal Opportunity Plan (NP) and authors portions of the WIOA Combined State Plan, including the Nondiscrimination/Equal Opportunity Assurances.
- Administers a multifaceted Equal Opportunity and Civil Rights Compliance program which ensures that Wisconsin's eleven local Workforce Development Boards (WDBs) and job centers comply with federal and state equal opportunity and civil rights statutes, regulations, guidelines, and Executive Orders.
- Designs equal opportunity systems so that local WDBs and their subrecipients provide services and benefits to eligible program participants.
- Reviews compliance of Wisconsin's one-stop job centers with the Job Center Complaint Coordinator (JCCC) referral system. The State of Wisconsin identified this system in the WIOA State Plan Assurances as the system that would respond to customer complaints and comply with the one-stop complaint procedure required by statute.
- Assists other bureaus and units in DWD, as necessary, on Civil Rights compliance, complaint and grievance processing, and addresses and manages the WIOA program discrimination complaints.
- Serves as a liaison between DWD and the Civil Rights Center (CRC) of the U.S. Department of Labor (DOL).
- Provides equal opportunity and civil rights guidance to Wisconsin's employment and training community and its job centers.
- Builds and maintain a network of resources and team members to appropriately resolve WIOA disputes.

The BWT EO Officer conducts annual equal opportunity monitoring of local WDBs, which includes:

- Remote Desk Review Survey – A questionnaire that assesses the WDBs' level compliance against the WIOA regulations based on the following elements:
 - Element 1: Designation of EO Officer
 - Element 2: Notice and Communications
 - Element 3: Assurance
 - Element 4: Universal Access and Affirmative Outreach
 - Element 5: Compliance with Section 504 of the Rehabilitation Act of 1973 and The Americans 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
- Local EO Officer interview – The BWT EO Officer meets with the local EO Officer to discuss the scope of the annual monitoring review, clarify issues from the desk review, and provide an opportunity to ask questions.
- Programmatic and accessibility reviews of job centers – Walk-through inspections of most job centers are conducted during the review to confirm that comprehensive job center sites are physically and programmatically accessible to individuals with disabilities.
- File review – Reviews of participants' files to ensure the participants' needs and special needs are being met.
- Participant interviews – Interviews with participant to provide them an opportunity to share their experiences safely.

The focus of the annual review for PY 23-24 is participant centric. It aims to determine compliance with civil rights, equal opportunity, and nondiscrimination requirements and to identify potential significant differences or disparities during the desk review, on-site audits, file reviews, and participant interviews. This allows for a more comprehensive look at the overall case file, the participant's progression through the program, and a holistic evaluation of outcomes.

Following monitoring, a written report is issued to key local Workforce Development Board (WDB) leaders, which requires corrective action for instances of identified non-compliance.

DWD requires that all local WDBs designate a local EO officer who is responsible for coordinating their nondiscrimination and equal opportunity program (small recipients as defined by [29 CFR 38.4\(ggg\)](#) and [29 CFR 38.4\(hhh\)](#) are exempt from this requirement). The local EO officer is responsible for monitoring

and investigating the local recipient and subrecipient activities to ensure they do not violate nondiscrimination and equal opportunity requirements under WIOA Title I. The EO officer reviews the local recipient's written policies and procedures annually to ensure that those policies are nondiscriminatory. DWD's current Nondiscrimination Plan requires the local EO officer to provide EO training to the subrecipient's staff 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 the recipient and subrecipient staff helps ensure compliance with WIOA programmatic accessibility requirements.

As WIOA requires, local WDBs 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's Division of Employment and Training, as the WIOA lead partner for Wisconsin, issued the Wisconsin One-Stop Delivery Self-Certification Attestation document, One-Stop Certification Checklist – One-Stop System, and a Job Center One-Stop Certification Checklist in April 2022. Job center certification requires the following physical and programmatic accessibility documents:

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

The number of Certified Job Centers as of June 2023 is: 15 Comprehensive, 19 Affiliate, and 1 Specialized (35 total).

The Coordinated Monitoring Team identifies training needs through monitoring and as they are raised by local staff throughout the year. After the needs are identified, the Coordinated Monitoring Team delivers training to address those needs, or partners with other entities to delivery such training. DWD's Division of Vocational Rehabilitation (DVR) has provided staff training to WIOA partners via the statewide WIOA Roundtable on topics to promote disability awareness including accessibility, the DVR talent pool, innovative business services, and other topics related to customer service for individuals with disabilities seeking employment. The BWT EO Officer attends the bimonthly Wisconsin Workforce Development Association (WWDA) Equal Opportunity subcommittee meetings as well as responds to questions from the WDB EO Officers, provides training and technical assistance as requested and based on trends in the annual monitoring findings.

Equal access is ensured by utilizing available technologies, providing accommodations, making materials available in alternate formats and websites accessible. DET requires that the local EO Officers receive at least eight hours of training per fiscal year from training sources that have been approved by the DET EO Officer. Local WDBs and/or their contracted one-stop operators 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 and/or their contracted one-stop operators develop and implement plans to remove or mitigate 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 reviewed regularly, at minimum annually for accessibility.

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR ENGLISH LANGUAGE LEARNERS

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

The Wisconsin Department of Workforce Development's (DWD) programs are committed to growing and diversifying DWD's activities and services through improved access and engagement by developing strategies to engage populations that tend to have lower Labor Force Participation Rates, including but not limited to individuals facing cultural and language barriers.

The one-stop delivery system addresses accessibility for individuals who are English language learners by identifying and attempting to bridge the barriers faced in accessing and maintaining usage of the services provided by WIOA core and Combined State Plan partners. The delivery of high-quality services to individuals with Limited English Proficiency (LEP) by the one-stop delivery system is ensured in the following manner:

Local Workforce Development Boards (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 conduct an annual analysis of the area's LEP population. Each local WDB has developed a comprehensive Language Assistance Plan based on the Appendix to 29 CFR § 38.9. Recipient Language Assistance Plan (LEP Plan): Promising Practices.
- Local WDBs provide oral interpretation to participants at no cost, make available language access procedures to program staff, and train program staff 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 information (hard copy or electronic) is translated into appropriate non-English languages. A Babel Notice, which is attached to documents that contain vital information that is not translated, includes information in multiple languages to inform the reader that the communication contains important information and that translation services will be provided at no cost to participants and customers.
- Local WDBs must develop affirmative outreach plans and activities for diverse groups and LEP communities. Outreach strategies in the plan may include advertising and engagement with community-based organizations. Participants needing ELL services are referred to training providers such as local technical colleges, literacy councils, and local community-based organizations to ensure WIOA services are accessible in the participant's preferred language.

The following must be in place at comprehensive one-stop centers:

- In the reception areas where customer services are provided, there must be posts and signs in various languages informing the public of interpreter services available at no charge to the public.

Interpreter services include providing in-person or remote ASL (American Sign Language) interpreters and LEP interpreter services. Where facilities have communication equipment, such as interpretive or assistive listening devices, staff must ensure the equipment is available and operational for communication between customers and staff.

- TTY (Telephone for the deaf) numbers must be included in any partner's telephone number listings. TTY numbers must be listed and identified on all letterhead, business cards, brochures or fliers, posters, websites, or similar documents or communication tools whenever a telephone number is listed. Staff must have instruction and demonstrated proficiency in TTY use and access to TTYs sufficient to perform their job tasks. Frontline staff must be capable of receiving and initiating TTY calls and relay calls.
- In offices where video communication equipment is installed, staff must have instruction and demonstrated proficiency to operate the equipment for communication, such as videophone calls, sufficient to perform their job tasks.
- If the customer is Limited English Proficient or deaf or hard of hearing, staff explain to the individual the right to have a language interpreter service at no cost.
- When a staff person becomes aware that effective communication is not occurring, appropriate interpreter services are provided to ensure equal access.
- In addition to the required initial contact sign posted in each reception area of partner offices where customers are served, there may be a need to print certain other documents in various languages. Partners will determine on a case-by-case basis which documents will be printed depending on the customer's primary language, the number of customers needing language interpretation, and whether the document is considered vital. Audio or video translations, if needed (instead of printed material), may be utilized. In the event no written translation of documents is available, partners will ensure that in-person translation or translation by telephone will be provided in a timely manner.
- Printed material for the use of the general public must include the notation that the material is available in alternate formats upon request. Alternate formats may include translating of the material into a language other than English, large print, Braille, audio, or electronic version, etc.
- Staff members who may be called upon to utilize interpreter services under these requirements will be trained on the processes involved in requesting and providing those services.

DWD's Bureau of Workforce Training (BWT) EO Officer is tasked with ensuring that local WDBs comply with the requirements outlined above by doing the following:

- Monitoring the accessibility of programs and services of the local WDBs via desk review and comprehensive job centers as part of the annual on-site monitoring.
- Reviewing participant's files to ensure the participants' needs and special needs are being addressed.
- Interviewing participants to assess their overall experience during their participation in programs and activities.

The BWT EO Officer also provides ongoing technical assistance via email, as requested at the bi-monthly EO Subcommittee or local WDB staff meetings. The local WDBs train staff on several areas, including how to serve customers with Limited English Proficiency.

IV. COORDINATION WITH STATE PLAN PROGRAMS.

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

The WIOA Combined State Plan programs in Wisconsin have been involved in WIOA planning and coordination since WIOA's enactment in July of 2014. A state WIOA Joint Operations Committee structure has been developed through consultation with WIOA Combined State Plan programs and the state and local Workforce Development Boards (WDBs). To ensure ongoing communication between WIOA partners at the state and local level, the Department of Workforce Development holds weekly calls with program staff and all 11 directors of the local to discuss recent developments, best practices and address any questions or concerns.

Staff of the combined state plan programs and required one-stop partners engage in coordination efforts through multi-agency Inter-Service Delivery (ISD) Teams that report through the WIOA Joint Operations Committee Structure via the ISD Steering Committee. The existing ISD teams and their purposes are:

- **Policy and Guiding Principles:** To identify, investigate and approve policies, best practices, recommended actions, and tools for the WIOA Titles and partner programs as it relates to the Integrated Service Delivery model development and implementation in Wisconsin.
- **Communications:** To establish the overall communication strategy for the WIOA Titles and partner programs as it relates to the Integrated Service Delivery Model development and implementation in Wisconsin, including the work on the projects under the Common Intake and Data Integration Projects.
- **Data Steward:** To support the overall WIOA Leadership Data Strategy for the WIOA Titles and partner programs to meet their WIOA State Plan Commitments, and to carry out data activities needed to support the Integrated Service Delivery Model development and implementation in Wisconsin, including the work on Common Intake and data integration projects.
- **IT:** To receive and communicate project ideas from the business teams, recommend IT solutions and coordinate the delivery of the projects for the WIOA Titles and partner programs as it relates to the Integrated Service Delivery Model development and implementation in Wisconsin, including the work on the projects under the Common Intake and Data Integration Projects.

Efforts to coordinate the development of the PY2024 – 2027 WIOA Combined State Plan began in fall of 2022 when the cabinet-level leadership of the WIOA Combined State Plan partners led a state kickoff in October of 2022. This event was attended by workforce development system partners and stakeholders and featured a panel on advancing successful partnerships through the WIOA Combined State Plan and a discussion on the state's vision for the WIOA Combined State Plan.

Following the meeting, DWD organized and facilitated two work sessions, one in April and one in June of 2023. Representatives of the WIOA Combined State Plan programs and one-stop required partners were invited to these facilitated events to jointly develop shared sections of the WIOA Combined State Plan.

The WIOA Executive Committee provided WIOA Combined State Plan programs with the opportunity to review and comment on joint State Plan sections prior to the publication for public comment to ensure that partner input was well-incorporated.

V. COMMON ASSURANCES (for all core programs)

The Unified or Combined State Plan must include assurances that:	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 administering 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; (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
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
ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B**

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

(A) Identify the regions and the local workforce development areas designated in the State.

Wisconsin has identified two planning regions.

- Planning Region A (Regional Workforce Alliance): Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha Counties
- Planning Region B (NEW North Region): 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.

Wisconsin has approved the designation requests for 11 workforce development areas (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 V1, Table 1. Wisconsin Local Areas

Local Areas	Name	Counties
WDA 1	Southeastern	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

(B) Describe the process and policy used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Local Area Initial and Subsequent Designations

Wisconsin's state policies on local area initial and subsequent designations are outlined in the Department of Workforce Development (DWD) Division of Employment and Training (DET) DWD-DET WIOA Titles I-A and I-B Policy and Procedure Manual Chapters 1.3.2 and 1.3.3:

<https://dwd.wisconsin.gov/wioa/policy/01/01.3.htm#sectionTwo> and
<https://dwd.wisconsin.gov/wioa/policy/01/01.3.htm#sectionThree>.

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 local Workforce Development Boards (WDBs) 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 WDB and Chief Elected Officials 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 WIOA State Plan. The terms "met or exceeded" and "failure" are defined in section III (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, the Governor's Council on Workforce Investment (CWI). The 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 WDB. The risk analysis will include a review of the most recent completed 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 the U.S. Department of Labor (DOL) has the authority to determine fiscal integrity, we believe the state has a monitoring role in this with responsibility to inform DOL if we see fiscal concerns. Based on the risk analysis results, CWI will determine if DOL should be notified of possible fiscal integrity issues. DOL will determine if fiscal integrity was sustained. Under § 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 two-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 workforce board (i.e., the Governor's Council on Workforce Investment (CWI)) no later than June 30, 2027 (and every four years thereafter) indicating their intent to no longer be designated as currently structured. If the CWI does not receive such notification; the local area will be assumed and considered to have requested subsequent designation per WIOA Section 106 (b)(3) and 20 CFR § 679.250. Existing local areas are not required to submit requests for subsequent designation. On or before October 30, 2027 (and every four years thereafter) the CWI will review the criteria for subsequent designation for local workforce development areas (WDAs) seeking such designation. Under WIOA Section 106 (b)(3), 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 (CEO) and local WDB from any unit of local government, including local government consortia, may submit a request for designation of a new local WDA. Requests will be reviewed by the CWI, which will make recommendations to the Governor, who will approve or deny the request in accordance with established policy.

Planning Regions

Wisconsin's state policy on regional planning is outlined in DWD-DET's WIOA Titles I-A and I-B Policy and Procedure Manual Chapters 1.3.5: <https://dwd.wisconsin.gov/wioa/policy/01/01.3.htm#sectionFive>.

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 (LMI), including real-time LMI;
- The alignment of Sector Strategies with Career Pathways;
- Work-based learning, especially Apprenticeship and On-the-Job Training (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 (Regional Workforce Alliance)
Region B: WDA 4, 5 (NEW North Region)

A regional planning analysis was presented to local WDB 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.

Since the establishment of these regions, the Regional Workforce Alliance has partnered together and secured a single One-Stop Operator (OSO) for the entire region. This helps ensure consistency between job centers throughout three WDA regions. Their Regional Plan outlines regional workforce development needs, provides labor market analysis and projections, establishes workforce program goals, defines governance structures and local policies, identifies service providers and locations.

The NEW North Region has collaboratively developed a common mission, vision, values, and outcomes that can be found at: <https://www.thenewnorth.com/>.

(C) Provide the appeals process and policy referred to in section 106(b)(5) of WIOA relating to designation of local areas.

Wisconsin's state policy on the appeals process relating to designations of local areas is outlined in DWD-DET's WIOA Titles I-A and I-B Policy and Procedure Manual Chapters 1.3.4:
<https://dwd.wisconsin.gov/wioa/policy/01/01.3.htm#sectionFour>.

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 CWI 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).

(D) Provide the appeals process and policy referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding

Wisconsin's state policy on appeals process relating to determinations for infrastructure funding is outlined in DWD-DET's WIOA Titles I-A and I-B Policy and Procedure Manual Chapters 2.6.2:
<https://dwd.wisconsin.gov/wioa/policy/02/02.6.htm>.

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

- (A) Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.*
- (B) Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.*

Governor's Set Aside Funding: Wisconsin expects to utilize 15% of the Title I set aside funds for the administrative purposes (as allowed under WIOA Sections 128 and 133) and the remaining portion for both: required statewide activities and allowed statewide activities that support the strategic goals set forth in this four-year WIOA Combined State 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.

These initiatives will be evaluated by measuring associations between the specific initiative and measurable skills gains, credential attainment, and employment outcomes (rates and wages). The focus is to determine which work-based learning initiatives are most strongly associated with [good jobs](#) and/or career advancement opportunities.

Apprenticeship strategies for both youth and registered programs to enhance current state efforts including expanding the bridging between the two programs. Evaluation starts with quarterly tracking of co-enrollment between the two Apprenticeship Programs (Youth Apprenticeship and Registered Apprenticeship) and WIOA Title I Programs (Adult, Youth, and Dislocated Worker). Results are used operationally and for research purposes. Operationally, co-enrollment statistics along with identification of workforce development areas (WDA) with high

and low co-enrollments will be used to set co-enrollment targets. Research staff will further investigate the areas with high co-enrollment to identify and share strategies that may increase participation in apprenticeship opportunities. Deeper analysis will investigate the diversity of these co-enrollments by both demographics and employment influencers.

Coordinated business services. Both qualitative and quantitative data will be collected for coordinated business services evaluation. Qualitative data—regarding perceptions of how well coordinated business services are meeting the needs of the local economy—will be collected from relevant stakeholders (for example, local Workforce Development Boards (WDB), local economists, local businesses, Chambers of Commerce). Specific emphasis will be placed on declining industries and high-demand industries (including those in [Hot Jobs Projections on WisConomy](#)—developed by DWD's Bureau of Workforce Information and Technical Support (BWITS) staff; Science, Technology, Engineering, Art, and Mathematics (STEAM); Artificial Intelligence (AI); and generative AI).

Quantitative data will compare the distribution of industries of the businesses served with the distribution of industries in the local economy. The analysis is multi-part. First, it will compare the types of industries that participants in different WIOA programs find and retain jobs. It will then compare the distribution of participants in each industry to the distribution of the industries of the businesses served. Finally, measures of job retention, repeat business customers, opportunities for [good jobs](#), provision of WIOA funded work-based training, industry representation on the Governor's Council on Workforce Investment (CWI) and local WDBs, and types of business services used will also be considered.

Associations between these measures, usage of coordinated business services, and employment outcomes—combined with the other quantitative and qualitative information—will provide feedback for strategic planning and direction for continuous improvement of coordinated business services. For example, if one industry is under-represented in the businesses served, targeted outreach to that industry could be employed.

Expanded partnerships with the Wisconsin Department of Corrections (DOC) to increase job center efforts inside of prisons, support instructional needs for inmates, and to seek innovative ways to provide training to incarcerated clients. Evaluation includes tracking the number of programs inside prisons and the number of individuals in each facility using these programs. Further, the employment outcomes will be measured post-exit and evaluated against the training services, service delivery method, and timeline of service provision. These outcomes will be compared against similar individuals who did not participate in the programs. A feedback loop with local employers, trainers, staff, and participants (before, during, and after program participation) will be established to identify instructional needs that are based on the participants' interests, skills, abilities, the local job market, and workforce needs. Findings will be used to create innovative solutions to better provide training to future participants.

As part of a continuous improvement process, these three evaluations (participation counts, comparing employment outcomes to a comparable population, and customer feedback) will be repeated regularly to determine if innovated solutions improve employment and training service delivery. This will guide further innovation to help improve employment services for justice-involved individuals.

Identifying and responding to skill gap/job quality issues to address workforce development needs. Evaluation is two-fold. First, evaluation efforts seek to identify and respond to skill gap/job-quality issues. Second, the process is then evaluated to determine if it is addressing workforce development needs. Identification and responding to skill gap/job quality issues includes: (1) analysis of resumes and job postings on Job Center of Wisconsin and (2) interviewing job seekers, employers, local workforce boards, and trainers. Program staff will use findings along with [Hot Jobs Projections on WisConomy](#) to identify skills gaps and provide insight into whether the workforce development needs are due to the skill gaps, lack of [good jobs](#), or both.

When skill gaps need to be addressed, program staff will then work with local WDBs, employers, job seekers, and trainers to ensure WIOA Title I participants have access to trainings to develop skills for good jobs that are high demand and local. These trainings will be assessed to determine if they lead to good jobs. When the lack of good jobs needs to be addressed, program staff will work with local WDBs, employers, and job seekers to identify strategies to improve job quality to meet the good jobs criteria.

Measuring changes in the duration job postings are open on Job Center of Wisconsin for each local area, coupled with surveys to local employers and job seekers will provide a feedback loop to inform whether this process is effective or if additional efforts are required to improve the evaluation process of identifying and responding to skill gaps/job quality.

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. Evaluation will first assess whether targeted outreach efforts increase services to the identified special population. It will then consider whether services targeted for these special populations are associated with either similar or improved employment and training outcomes relative to a comparable group of participants that received standard Title I Adult, Dislocated Worker, and Youth services. Qualitative feedback on pilot programs will be solicited from program participants and frontline staff to provide a feedback loop for customer-centered improvements to pilot programs.

Expanded use of artificial intelligence (AI) and/or virtual reality (VR) in the provision of services to job seekers and employers. Evaluation includes both quantitative and qualitative methods. Qualitative data from job seekers and employers will be collected regarding perceptions of the technology, particularly related to service provision and skills gained (when appropriate). Employment outcomes and time in program will be measured and analyzed relative to a comparable population. Together, this information will be used to provide a regular feedback loop to continuously improve the use of these technologies. Further, evaluations will assess if AI and/or VR technology improves training outcomes, employment rates, and/or wages.

Addressing workforce needs for advancing green/renewable energy. Evaluation will track training needs required by employers to address skills gaps in these areas. Trainings implemented will be evaluated by the employment outcomes of their participants and the employers' assessment of the sufficiency of the training.

Addressing workforce needs for broadband expansion and other infrastructure development. Related to broadband access, we will assess the broadband and data literacy needs of job seekers, workers, and employers. Based on the assessment, efforts will expand broadband

access, provide data literacy training and technical assistance, and/or implement other strategies that address job seekers' barriers to connecting to good jobs due to limits in broadband accessibility. We will assess if implemented strategies improve employment outcomes for job seekers who reported issues in access to broadband technology.

Related to addressing workforce needs to develop the infrastructure to provide broadband access and digital literacy training, evaluation will track training needs required by employers to address skills gaps in these areas. Trainings implemented will be evaluated by the employment outcomes of their participants and the employers' assessment of the sufficiency of the training.

Increase understanding of impacts of regional sector strategy priorities and partnership initiatives. Identify difficulties in data sharing for the purpose of better assessing regional sector strategies. DWD will evaluate overall data sharing processes: between divisions within the Department, as well as external WIOA partners. Based on findings, WIOA partners may create a Statewide Data Governance team to better manage data at the regional and state level.

Overall program evaluation of the Title I Adult, Dislocated Worker, and Youth activities will focus on indicators of diversity, inclusion, and equity (such as demographics, employment influencers, and program outcomes) by comparing program participants to a comparable population within the labor force. Associations between programs/services and employment outcomes will also be analyzed. The aim will be to determine what programs/services have the most influence on improved measurable skills gains, credential attainment, and employment outcomes (rates and wages), with a specific focus on identifying which programs lead to good jobs and/or career advancement opportunities. Further analysis will be conducted determine if improved employment outcomes lead to family-sustaining wages.

To incorporate continuous improvement, enrollment counts by demographics and employment influencers (for example, homeless, foster care, opioid addicted, military veterans and their spouses, etc.) will be evaluated so program staff can identify when there are discrepancies between the population served and the comparable population in the labor market. Additionally, targeted outreach efforts to specific populations will be evaluated to understand the outreach methods' effectiveness in increasing services to the identified population and to provide feedback useful in determining whether the method could be applied to another specified population. Operational staff will use evidence-based technical assistance from the Department of Workforce Development (DWD)'s Workforce Data Integration System (WDIS) team and findings from the Worker Connection evaluation to help inform and implement these metrics and a continuous improvement process with the aim to better reach, engage, and serve marginalized populations.

DWD WDIS establishes a [Learning Agenda](#) every four years. This is a strategic plan for evidence building. The learning agenda includes research goals evaluating all its service delivery programs, including Title I Adult, Dislocated Worker, and Youth programs. Relevant to Title I programs, the learning agenda questions investigate:

- The impact of individual program services (and their interactions) on employment outcomes.
- The impact of program staff training on employment outcomes.
- Quality of service delivery and customer service and the influence of technology.
- Cost-effectiveness of programs.
- How to use local labor market information to improve service delivery.

- Establishing feedback staff and customer feedback loops on the accessibility and engagement in services.
- Effectiveness of targeted outreach for program services.
- Diversity of the program staff and participants relative to local labor market conditions.
- The impact of diversity within program participation and employment outcomes.

To address the learning questions more specifically, each year an [Evidence Plan](#) is established. The Evidence Plan develops an operational structure to address each year's priorities from the Learning Agenda by providing a plan for what data and methodology will be used to address specific sub-questions related to the broad questions on the Learning Agenda. Challenges and a dissemination strategy are outlined as well. Results from these evaluations are used to drive evidence-based decision-making regarding program policy, training of service providers, use of funding, continuous improvement, and for the provision of technical assistance when performance measurements are inadequate.

Altogether, the learning agenda and evidence plans provide a means to not only measure and monitor performance of the Title I Adult, Dislocated Worker, and Youth programs, but also build evidence to improve service delivery, program efficiencies, and improve program outcomes.

(C) Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.

Since 2015, the Wisconsin Department of Workforce Development (DWD) has had a grant system in place that allows it to distribute funds from its rapid response reserve in an effective manner so that the state's 11 local rapid response teams can provide needed aid to companies and employees impacted by workforce reductions and business closings occurring within their respective workforce development areas (WDAs). The grant system involves three types of grants – Rapid Response Annual Allotment Grants, Dislocation Grants, and Additional Assistance Grants.

Annual Allotment Grants provide each of the local rapid response teams with a dedicated source of funding to support layoff transition activities. Each year, DWD earmarks a portion of its total rapid response funds for this purpose. A formula is then used to determine the amount that each of the local WDAs receive. The grant awards can be used flexibly, however, all costs charged to the grants must be connected to building, maintaining, and operating the local WDA's rapid response program – this includes staff and other costs for planning, coordination, and the provision of local rapid response services. Per the grant agreement, a minimum level of rapid response services must be offered for each layoff event impacting at least 25 employees. As layoff events grow in the number impacted, the minimum level of services to be offered also expands.

Dislocation Grants provide the local rapid response teams with supplemental funding to cover staff and other costs associated with the provision of layoff transition activities for specific layoff events. All costs charged to these grants must be related to the delivery of rapid response services to impacted employees from the layoff event for which the grant was awarded.

Additional Assistance Grants provide local Workforce Development Boards (WDBs) with funding to supplement their Title I Dislocated Worker Program formula funding allocations when significant layoffs

place unanticipated demand on a local workforce development area's existing formula resources. DWD has established eligibility criteria that must be met before a local WDB is eligible for funding.

DWD also uses funding from its rapid response reserve to invest in projects and initiatives that enhance the state's rapid response program. Past examples include: developing web-based dislocation events and rapid response services tracking system, configuring a dislocated worker paper survey so that optical character recognition software could be used to compile results from completed surveys, creating a web-based dislocated worker survey, outfitting the local rapid response teams with laptops and other equipment so they can better integrate technology into the provision of rapid response services, and developing a series of professionally produced videos on layoff-related topics. DWD continues to work with its local rapid response teams and other partners to identify ways to improve and enhance the state's rapid response program.

Early intervention and comprehensive pre-layoff assistance are the foundation of the state's layoff aversion strategy which focuses on training, supporting, and empowering its local rapid response teams to:

- Identify and connect with employers at risk of permanent employee layoffs as far in advance of the layoffs as possible. In this respect, DWD will continue to explore options to monitor media sources more efficiently and effectively 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 Department will also continue to work with the local rapid response teams to strengthen communication and collaboration with the Wisconsin Economic Development Corporation and the extended enterprise of local economic development organizations.
- Educate at-risk employers about the state's work-share program.
- Help minimize the duration of unemployment resulting from layoffs by promoting proactive and comprehensive pre-layoff assistance to impacted employees.

(D) Describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

The Wisconsin Department of Military Affairs, Division of Emergency Management (DEM) leads disaster response activities throughout the state, working closely with the 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. The Department's Bureau of Workforce Training's (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, the DWD Bureau of Workforce Training's (BWT) Program Administration Section will collaborate with the WRTF network of partners and the affected local Workforce Development Boards (WDBs) to ensure effective use of resources and implementation of strategies. DWD will ensure that local rapid response teams provide services to help mitigate

unemployment resulting from the disaster. The local WDBs and the DWD Bureau of Job Service are charged with collaboratively carrying out rapid response activities within their respective areas. In cases of natural disasters, DWD will strongly encourage the use of its mobile career lab and the establishment of 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 local WDBs 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 and disseminate information about services to those affected by the disaster. DWD will also consult with the local area(s) to determine whether to pursue a regular or disaster National Dislocated Worker Grant (NDWG). If a disaster NDWG is pursued, DWD will seek guidance and technical assistance from the U.S. Department of Labor (DOL) Regional Office and other states that have more experience implementing these types of grants.

(E) Describe how the State provides early intervention (e.g., Rapid Response) and ensures the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A) and TAA Section 221(a)(2)(A) .) This description must include how the State disseminates benefit information to provide workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition and how the state will ensure the provision of appropriate career service to workers in the groups identified in the petition (TAA Sec. 221(a)(2)(A)).

As of July 1, 2022, the termination provision under Section 285(a) of the Trade Act of 1974, as amended, took effect. This means that the U.S. Department of Labor (DOL) may not conduct new investigations or issue certifications of eligibility for new groups of workers. In addition, benefits and services under the Trade Adjustment Assistance (TAA) Program may not be provided to workers who were certified prior to July 1, 2022, but who were not separated from their employment before that date. As such, unless and until the TAA Program is reauthorized by Congress, there will be no new petitions, therefore coordination between the state's TAA Program and its rapid response program is currently at a halt. Furthermore, as outlined in [TEGL 14-22](#), "[s]ince a Petition may no longer be filed, the requirement . . . to provide Rapid Response and appropriate career services under the Workforce Innovation and Opportunity Act (WIOA) does not apply."

If the TAA Program is reinstated, the Wisconsin Department of Workforce Development (DWD) will extend rapid response services to all worker groups covered by new TAA petitions, just as it provides rapid response services to any group of impacted employees that have or will be permanently laid off. In most cases, DWD and its local rapid response teams 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 will notify the appropriate 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 set forth in the Rapid Response Annual Allotment Grant agreements. When local 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 and the benefits of co-enrolling in both the TAA Program and the Dislocated Worker Program.

If the local rapid response team does not have access to the potentially eligible TAA worker group prior to layoff, DWD uses unemployment insurance claimant information to identify potentially impacted workers. In this situation, the local rapid response team will reach out to the laid off workers using contact information obtained from the DWD's Unemployment Insurance (UI) Division; this is no different from DWD's standard rapid response protocol. A local Workforce Development Board 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's TAA Program is responsible for identifying individuals potentially eligible under the certification through worker lists supplied by the employer and/or unemployment insurance 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 for the program. 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, Wisconsin 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 is committed to continually exploring ways to make TAA Program information more user-friendly and to improve coordination between TAA and WIOA programs. As an example, DWD 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 WORKER PROGRAM REQUIREMENTS

1. WORK BASED TRAINING MODELS

If the State is utilizing work-based training models (e.g., on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

The Wisconsin Department of Workforce Development (DWD) Division of Employment and Training (DET) priority focus is to increase utilization of work-based training strategies by employers, including On-the-Job Training (OJT), Registered Apprenticeship, Incumbent Worker Training (IWT), and customized training. As identified previously in this state plan, the pool of available job seekers is increasingly shrinking. As such, it is imperative to engage with the business community in new and innovative ways to help them support and advance their existing workers to train them for more skilled positions, including the jobs of the future. To ensure this, DET will do the following:

Increase, and improve upon, the use of On-the-Job Training (OJT) as a training strategy.

DET plans to take several steps to ensure that OJTs are accessible to employers throughout the state, and result in successful, high-quality experiences for both participants and employers, including:

- Increasing targeted outreach to program participants and employers about OJT opportunities by leveraging various partners' relationships with employers (e.g., state and local economic development, Job Service, Veterans Services, etc.), pursuing paid outreach strategies, highlighting previous OJT successes, and improving upon existing outreach in terms of frequency, reach, and dissemination of information.
- Scaling identified best practices to develop streamlined standardized forms, including contracts and training plan templates, which will reduce the paperwork burden on employers and participants, decrease the time it take to get a trainee placed in a position, and provide transparency on the expectations and value-add of OJT activities.
- Ensuring participants are job ready prior to the OJT opportunities through the enhanced provision of career services.
- Working closely with employers to adapt OJT opportunities and strategies that align with economic trends (public health emergencies, worker shortage, etc.).
- Enhancing Wisconsin's public-facing employer job posting website to add a field asking employers to indicate their interest in OJT opportunities, and a related back-end process to generate appropriate referrals based on this response.
- Providing statewide webinars on OJTs to employers as the targeted audience.
- Conducting focus groups with employers to strategize what their needs are and discussing virtual OJT options.
- Ensuring effective training plans are developed and adequately monitored.

Increase, and improve upon, the use of incumbent worker training (IWT) as a training strategy.

DWD-DET will work with Wisconsin's local Workforce Development Boards (WDBs) to improve upon the accessibility of IWT for employers, and increase the use of IWT statewide, by:

- providing ongoing training, technical assistance, and compliance assistance to the local WDBs as they develop and/or implement IWT policies; maximize the use of Adult and Dislocated Worker program funding for the delivery of IWT; and provide IWT services;
- conducting targeted outreach to employers highlighting the availability and benefits of IWT;
- exploring the expansion of Wisconsin's Rapid Response program to include IWT as a layoff aversion strategy for at-risk businesses and workers.

Increase, and improve upon, the use of Customized Training as a training strategy.

The Wisconsin Department of Workforce Development (DWD) Division of Employment and Training (DET) will work with Wisconsin's local Workforce Development Boards (WDBs) and the Wisconsin Technical College System (WTC) to shift the focus of worker retraining activities away from more traditional education options and toward industry-led, sector-based, customized training strategies. This preferred training strategy will ensure that employers' needs for workers that possess the skills they need to be successful, are met quickly and efficiently.

Through the provision of ongoing technical assistance, and dissemination of proven best practices, DET will also help local WDBs establish logical, coordinated procedures that utilize customized training to develop entry-level worker for a business/industry, and then utilize IWT to advance those workers along

an identified career pathway. This continuous improvement loop will ensure that neither workers nor industries stagnate due to outdated skillsets and will ensure the strength of Wisconsin's economy by consistently ensuring that Wisconsin workers have current skills that remain competitive in the global market.

Bridging the Adult Program and Dislocated Worker Program with Registered Apprenticeship

This is addressed directly below.

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

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

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

To access all of Wisconsin's Eligible Training Provider (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 but rather is a summary of those policies and procedures.

Wisconsin's Initial Eligibility Procedure for the ETPL is as follows:

1. A representative from a training institution submits an Institution Application through the state's [ETPL Provider Portal](#). An institution Application may be submitted at any time.
2. The Department of Workforce Development (DWD) Division of Employment and Training (DET) reviews the Institution Application to determine whether the institution meets the [Institution Minimum Requirements](#). If the training institution does not meet the Institution Minimum Requirements, it is ineligible for Wisconsin's ETPL.
3. If the institution meets the Institution Minimum Requirements, DET classifies the institution as either "[Standard](#)" or "[Alternate](#)."
 - a. A **Standard** institution can add one or more training programs to [the ETPL website](#) through the ETPL Provider Portal if it supplies all required program-level information for each program in the ETPL Provider Portal, which includes individual-level information for all students enrolled in the training program for the three most recently completed program years (if applicable).
 - b. An **Alternate** institution must submit a program application to DET through the ETPL Provider Portal for each training program it would like added to the ETPL website. DET will determine if the training program meets the alternate eligibility criteria. If the training program meets the criteria, the institution may publish the program to the [ETPL website](#) once it supplies all the required program-level information, including the individual-level student information referenced above, in the ETPL Provider Portal.

An institution is classified as a "Standard" if it meets at least one of the following standard eligibility criteria:

- It is part of the University of Wisconsin System, the Wisconsin Technical College System, or the Wisconsin Association of Independent Colleges and Universities.
- It is a public out-of-state university, technical college, or community college.
- It is a fully accredited tribal college or university.

OR

- It is an out-of-state institution providing distance education that is approved by the National Council for State Authorization Reciprocity Agreement (NC-SARA) and it will include only distance education programs on Wisconsin's ETPL.

If an institution is not a Standard institution, DET classifies it as an "Alternate" institution. An Alternate institution must demonstrate, when applicable, that it has approval or licensure by the appropriate regulatory authority to provide the training program in question. An institution subject to Wisconsin's Educational Approval Program's (EAP) regulatory authority must demonstrate it has secured approval from the EAP before its program can be determined eligible for Wisconsin's ETPL. Likewise, an institution that is required to obtain approval or licensure by another government agency or board – in addition to, or in lieu of, the EAP – must demonstrate it has secured such approval or licensure before its program can be determined eligible for Wisconsin's ETPL. If an Alternate institution's program is not regulated by a government authority, it may still be eligible for Wisconsin's ETPL if it meets additional criteria as outlined in [Chapter 7.4.7](#) of DWD's online manual.

Wisconsin's Continued Eligibility Procedure for the ETPL is as follows:

DET performs its continued eligibility procedure for all institutions and their programs between July 1 and August 31 annually, regardless of when the institution's program eligibility began. Institutions and their programs that pass continued eligibility requirements maintain their listing on Wisconsin's ETPL website. Wisconsin's continued eligibility procedure consists of the following steps:

1. DET verifies that the institution still meets DWD-DET's [Institution Minimum Requirements](#);
2. DET verifies that the institution still meets at least one of DWD-DET's standard eligibility criteria or, if the institution is classified as an Alternate, the program meets DWD-DET's alternate eligibility criteria;

AND

3. The institution uses the ETPL Provider Portal to submit a file in the required format that contains individual-level information for all students who were enrolled in the training program for the most recently completed program year (i.e., July 1 through June 30).

Registered Apprenticeship sponsors are not subject to the same eligibility requirements as other training institutions. DET will publish training programs on Wisconsin's ETPL, without applying its initial or continued eligibility procedures if any of the following apply:

- The program is registered with DET's Bureau of Apprenticeship Standards (BAS) – which is Wisconsin's office of apprenticeship – or another state's apprenticeship agency.
- The program is registered with the U.S. Department of Labor's Office of Apprenticeship.

BAS-registered sponsors may consent to have their programs published on Wisconsin's ETPL by sending an email to Apprenticeship@dwd.wisconsin.gov with the name of the program(s) the sponsor would like added to Wisconsin's ETPL.

Sponsors registered with another state's apprenticeship agency, or the U.S. Department of Labor's Office of Apprenticeship, must submit an institution application through the [ETPL Provider Portal](#). The applicant should select "Registered Apprenticeship" as the institution type when completing the institution application. Submitting the institution application puts DET on notice that the sponsor consents to have one or more Registered Apprenticeship programs published on Wisconsin's ETPL.

Once DET receives the sponsor's consent to add a program to the ETPL, DET must (1) verify that the identified program is registered with BAS, another state's apprenticeship agency or the U.S. Department of Labor's Office of Apprenticeship and (2) verify that the sponsor and the provider(s) of the classroom/related instruction are not suspended or debarred from participating in federal programs or activities. Only programs that meet both criteria may be published on Wisconsin's ETPL as Registered Apprenticeship programs.

4. ADULT PRIORITY OF SERVICE

Describe how the State will implement and monitor for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).

For the complete Priority of Service policy, please see [Chapter 8](#) of DWD's WIOA Title I-A & I-B Policy & Procedure Manual.

"Priority of service" means the right to take precedence over someone 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 allows them 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, then 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; with an 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 for all WIOA Title I programs. Only for the Adult Program must priority for individualized career services and training services also be given to participants who are designated:

- [low-income](#)*, and/or
- [basic skills deficient for the Adult Program](#)**.

*Includes public assistance recipients.

**Includes English Language Learners (ELL).

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 Workforce Development Board.
- Last: Everyone else.

The state has declined to add additional priority populations beyond those outlined above. However, a local Workforce Development Board (WDB) may choose to add more if the additional priority populations are identified in the WDB's Local Plan. The local WDB may also decide 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.

If the local WDB has a waitlist for any individualized career or training services, participants must be placed on the list consistent with the order outlined above.

Career planners should follow the following steps when serving individuals in the Adult Program:

1. Determine whether the individual seeking to enroll is a [veteran or eligible spouse](#).
2. Determine whether the individual is [low-income](#).
3. If the individual is not low-income, they 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, they are considered basic skills deficient.
4. 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 participant's 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. LOCAL AREA TRANSFER OF FUNDS BETWEEN ADULT AND DISLOCATED WORKER PROGRAMS

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 20 CFR § 683.130 allow the local Workforce Development Boards (WDBs) to transfer up to 100% of formula funds of a program year (PY) allocation between the Adult Program and Dislocated Worker Program. The Department of Workforce Development (DWD) Division of Employment and Training (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, DET will serve as the approving authority for the WDBs' funding transfer requests. To be eligible for a transfer, 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.

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.

Consistent with DWD-DET [WIOA Policy 3.3 Transfer of Funds](#), local WDBs must initiate transfer requests by submitting the WIOA Adult/Dislocated Worker Transfer Worksheet to their assigned Local Program Liaison.

DET will review the request and issue a determination within 30 days.

6. STATE'S POLICY ON WIOA AND TAA CO-ENROLLMENT

Describe the State's policy on WIOA and TAA co-enrollment and whether and how often this policy is disseminated to the local workforce development boards and required one-stop partners Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.325, 20 CFR 618.824(a)(3)(i).

The state has established a written policy and procedure, [13.1 Trade Adjustment Assistance \(TAA\) Program](#), that set forth co-enrollment criteria to be applied by local Workforce Development Boards (WDBs) and their contracted services providers when serving TAA participants. This policy became effective April 19, 2021, and is available in the Wisconsin Department of Workforce Development (DWD) Division of Employment and Training (DET) WIOA Title I-A & I-B Policy & Procedure Manual. Relevant partners were notified via email listserv. This policy indicates that:

- Co-enrollment is required with the Dislocated Worker Program unless the TAA participant declines co-enrollment.
- DWD-DET cannot deny any participant's TAA Program benefits or services who decline co-enrollment with the Dislocated Worker Program.
- The TAA career planner is primarily responsible for informing participants of the Dislocated Worker program and connecting them to the appropriate staff.
- Most participants will meet the Dislocated Worker Program eligibility criteria unless the participant does not meet the Selective Service registration requirement.

DET plans to add to the terms & conditions of the Dislocated Worker grant agreements the requirement for the subrecipient to co-enroll TAA participants residing within the subrecipient's workforce development area (WDA) in Dislocated Worker Program services.

To help ensure that co-enrollment occurs, and is beneficial to the individual, DET established a TAA-Dislocated Worker Program co-enrollment workgroup. This group has designed a joint application form that captures all required data elements for both programs and plans to align assessment requirements, so a single assessment captures all pertinent information for both programs. Collectively, these actions will reduce the burden of duplicative documentation currently placed on program participants.

7. WIOA AND TAA CO-ENROLLMENT SERVICE STRATEGY

Describe the State's formal strategy to ensure that WIOA and TAA co-enrolled participants receive necessary funded benefits and services. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.816(c)

In addition to the required Co-Enrollment with the Dislocated Worker Program state policy mentioned in section VI(b)(6), WIOA Title I and TAA career planners share a Management Information System (MIS) referred to as ASSET. ASSET houses both programs' information, including a shared list of services, assessments, employment plans, and case notes so career planners can see which services each program has provided to their participants. Career planners can also see each participant's uploaded documents, including enrollment forms, assessments, and employment plans. WIOA Title I policy encourages career planners to upload documentation relevant to both programs. TAA has a list of required uploads that can be useful for WIOA Title I staff.

To help ensure participants receive necessary benefits and services, DWD-DET's WIOA Title I Policy & Procedure Manual provides guidance for when to provide referrals. Participants' needs are identified during the initial assessment and periodic check-ins with participants. During this time, career planners provide participant referrals to other one-stop partners.

In addition, if/when Congress reauthorizes the TAA Program, DET plans to design a shared intake flow in which career planners from both programs work together to conduct assessments and develop Individualized Employment Plans (IEPs) for co-enrolled participants.

8. ONE-STOP STAFF AND TAA

Describe the State's process for familiarizing one-stop staff with the TAA program. 20 CFR 618.804(j), 20 CFR 618.305

The TAA Program employs Job Service staff as service providers and trains them in the TAA Program. TAA provides staff desk guides, checklists, and policies to ensure accuracy with updates applied as needed. TAA staff update Job Service managers on monthly and quarterly conference calls and provide technical assistance to Dislocated Workers and rapid response staff as needed. One-stop operators train staff on services provided by all one-stop partners, including TAA. DET will provide joint training for TAA and Dislocated Worker staff in program year 2023.

In addition, if Congress reauthorizes the TAA Program, Wisconsin Department of Workforce Development (DWD) Division of Employment and Training (DET) will provide TAA policy information and updates in a statewide forum, such as Beyond Performance meetings or during a WIOA Roundtable.

C. YOUTH PROGRAM REQUIREMENTS

1. YOUTH WORKFORCE INVESTMENT GRANT AND CONTRACT AWARDS

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.⁴ Further, include a description of how the State assists local areas in determining whether to contract for services or to provide some or all of the program elements directly.

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

Wisconsin Department of Workforce Development (DWD) Division of Employment and Training (DET) 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 workforce development boards (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 the 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.

⁴ Sec. 102(b)(2)(D)(i)(V)

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.

The state largely leaves the decision of whether to contract for services, or deliver services directly, to the discretion of the local WDB. However, through its annual coordinated monitoring procedure DET evaluates the WIOA Youth program for both compliance and effectiveness. This includes reviewing operations at the local WDB and contracted service provider levels, if applicable. DET's monitoring takes into account the delivery mechanism for each of the 14 program elements, the frequency with which various program elements are delivered, the number of participants served, the demographic and geographic variety of participants served, customer satisfaction (as gauged via survey and/or direct participant interaction), and more. The results of DET's evaluation are documented in a formal report provided to the Executive Director, Chairperson, and Chief Elected Official of the local WDB. The report identifies corrective actions for identified areas of non-compliance, and recommended actions for identified opportunities for improvement. At times, these recommendations have included actions related to new and/or continued service provider contracts; cessation of existing service provider contracts; and/or the direct delivery of services. DET also uses the results of its monitoring to identify and disseminate innovative practices and areas of strength in delivering youth program elements throughout the state.

2. EQUITABLE RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH

Explain how the State assists local workforce boards in achieving equitable results for out-of-school and in-school youth. Describe promising practices or partnership models that local areas are

implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.

Wisconsin has the following six strategies to help support improved outcomes of out-of-school youth (OSY) and in-school youth (ISY) participants:

Leveraging and Aligning Resources

Efforts are 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 Department of Workforce Development (DWD) hosted a WIOA Roundtable event in May 2023 to bring together partners from across the state to increase communication and collaboration in the workforce system. At this event, multiple WIOA 101 sessions were held, which introduced attendees to the basic structure and expectations of WIOA. Due to the success of the WIOA Roundtable, DWD is considering hosting future WIOA events. To share WIOA information across partners, DWD has created (and is actively updating) a WIOA [webpage](#) that functions as an integrated service delivery tool. Users of the webpage can access trainings including the *Introduction to WIOA 101* video, view upcoming events, learn WIOA basics, and access communication pertaining to WIOA service delivery. Training partners associated with other programs can grow their partner knowledge of WIOA with the intent of increasing cross-program referrals and subsequent increase in co-enrollment. Progress with respect to these efforts is anticipated to result in improved outcomes for out-of-school youth (OSY) and in-school youth (ISY) participants, especially those who need Title II adult basic education and/or Title IV vocational rehabilitation activities.

Partnerships with other youth programs are available outside of the Job Center of Wisconsin (JCW). These partners include YouthBuild, Job Corps, Department of Public Instruction (DPI), and Wisconsin Challenge Academy. Job Corps has two locations in Wisconsin (Blackwell (Laona) and Milwaukee) and provide no-cost education and vocational training to youth. YouthBuild gives youth access to hands-on experience working on construction sites. The program is available in Madison, Elkhorn, Milwaukee, and Beloit. DPI leads a Wisconsin General Education Development (GED)/High School Equivalency Diploma (HSED) Program that provides youth the opportunity to earn a GED diploma and HSED through partnerships with the Wisconsin Technical College System. The Wisconsin Challenge Academy (sponsored by the Wisconsin National Guard) uses targeted outreach to 16 to 18-year-old OSY to provide skill development and educational opportunities.

DWD's Division of Employment and Training (DET) is developing a strategic training plan for WIOA Title I frontline staff and service providers related to WIOA Title I policy and best practices. DET began implementation of this plan with the delivery of a two-day, in-person career planner training event in the Fall of 2023. This training event included several hours of content designed to improve outcomes for OSY and ISY. Evaluation of this event is underway and will be used to inform the development of future trainings, including a training video series that will be available to frontline staff on-demand for onboarding and review purposes.

Virtual Reality for Training Delivery

Virtual reality (VR) is being used with increased frequency to improve access to vocational training. For youth, access to training can be inhibited by lack of transportation or the available hours for on-site training. The ability to pursue VR training options is pivotal to increasing opportunities for youth. DWD is exploring options to use Governor's set aside funding to support VR training initiatives. Evaluation of

these initiatives will include determining if the VR improves employment and training outcomes and will provide a feedback loop to improve the use of VR training to meet Youth employment needs.

Improving Wages Through Co-Enrollment

A [demonstration project](#) evaluating youth with disabilities receiving Supplemental Security Income (SSI) found that youth who were co-enrolled in WIOA Title IV (Division of Vocational Rehabilitation) and WIOA Title I and/or Title III services were 5.5 times more likely to be employed and earned an average of \$740 more per quarter. Specific services which were associated with increased employment outcomes include: JCW basic career self-information; Title I youth services (specifically ones related to case management and assessment). Youth receiving Title IV services and an apprenticeship were 5.6 times more likely to be employed and earned an average of \$2,000 more each quarter.

Given this information, co-enrollment opportunities will be a priority for staff training in the WIOA 101 training, training videos, and career planner training mentioned above. [DWD has established a co-enrollment dashboard](#) as a tool for program administrators and local partners to track co-enrollment. This will assist DWD in collaborating with, and supporting, local workforce boards to develop strategies to improve co-enrollment. DWD is currently in the process of streamlining referrals between DWD programs and the potential to expand this to other WIOA programs may be explored. DWD's Workforce Data Integration System (WDIS) team will continue to evaluate co-enrollment and its impact on employment outcomes.

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. DET is responsible for the oversight of the WIOA Title I Youth Program, the state's Registered Apprenticeship program, and the Youth Apprenticeship program. DET will assess how to bridge these programs, including cross-program training of state-level and frontline staff and developing and implementing innovative approaches to help more effectively connect OSY with apprenticeship sponsors.

Youth apprenticeships are designed to give ISY an opportunity to explore career pathways while they are high school juniors and seniors. Youth Apprenticeship further helps employers develop a qualified and committed workforce. Youth Apprenticeship Pathways consists of 11 program areas. These program areas include Agriculture, Construction, Visual Technology & Communication, Finance, Health Sciences, Hospitality & Tourism, IT, Manufacturing, Marketing, STEM, and Transportation & Logistics. Like Registered Apprenticeships, Youth Apprenticeships emphasize "earn while you learn" with obtaining a certification in one or two years at program completion. DET is actively working to develop engagement between its Youth Apprenticeship programming and its WIOA Title I Youth programming to maximize co-enrollment between the programs, starting with cross-functional staff education.

Integration of Technology in the Service Delivery Model

DET 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 their MyJCW portal on www.jobcenterofwisconsin.com. The modernization efforts are not intended to replace face-to-face interactions between participants and their career planners; rather, to enhance the service-delivery process by allowing participants and career

planners to exchange information and engage in effective asynchronous communication. The online tools that DET has developed include a Budget Planner, Economic Self-sufficiency Calculator, Community Resources Search, Action Steps, and Employment Plan development (which includes Individual Service Strategies for youth program participants). Program designing resulted in the CEPT application and its five associated tools being merged into the Automated System Support for Employment & Training (ASSET) application. This merger allows case management computer systems to be centrally located in a single application and the opportunity for future additions of new planning tools. DET anticipates positive engagement from ISY and OSY participants because youth tend to prefer engaging through technology.

DET is continuing to lead efforts to further enhance the CEPT application and the existing online tools. Current efforts include hosting a monthly ongoing Technical Assistance meeting where local boards can actively exchange ideas for CEPT improvements with DET staff. DET is continuously engaging in ways to update the current CEPT tools and develop new tools to improve the way customers, including ISY and OSY participants, engage with the public workforce development system.

Equitable Service Delivery

DWD's Workforce Data Integration System (WDIS) will consult in an evaluation of equitable service to ISY and OSY. This will include comparing the proportion of ISY and OSY served with local population estimates of comparable groups. It will also explore linking administrative data to facilitate targeted outreach to improve connecting underserved youth populations to employment programs. Ongoing evaluation efforts will be related to verifying that both the participant OSY and Opportunity Youth populations are representative of estimates of the Labor Force. Further, longitudinal data on both ISY and OSY program participant's employment outcomes will contribute to evaluation efforts to continuously improve these promising practices.

Bridging DWD-DET Worker Advancement Initiative Grant with WIOA

Through the American Rescue Plan Act (ARPA) Governor Evers established the Worker Advancement Initiative (WAI). The foundation of the initiative was modeled after WIOA by assisting participants whose employment was negatively impacted by the COVID-19 pandemic, through career services, training services, and supportive services via case management. However, one key difference from WIOA was the ability to provide cost-of-living stipends to participants while engaged in classroom-based training. This service better allowed participants to fully engage in training programs without needing to simultaneously engage in the workforce. WAI also established expectations for grantees to conduct targeted outreach to specific barriered populations. Collectively, this expanded service delivery model and mandated targeted outreach led to the development and/or strengthening of partnerships that increase equitable outcomes for youth. Such partnerships include working with local businesses that provide apprenticeships and trainings to youth such as She Slangs Wood (Milwaukee), All Hands Boatworks (Bradley Tech High School), CNA classes (Superior Senior High), African Heritage, Inc. (Appleton Area School District), and Apprenticeship Advantage (Green County). Due to the success of these partnerships with WAI, DET is exploring whether there are flexibilities in WIOA, such as the provision of needs-related payments, that may be used to continue these services.

3. YOUTH WORKFORCE INVESTMENT ACTIVITIES

Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards

can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.

The Department of Workforce Development (DWD) Division of Employment and Training (DET) has implemented and/or planned several initiatives that will assist with the delivery of youth workforce investment activities. One of these will bring stakeholders for youth programs together to provide guidance on future youth initiatives. Another will support the funding and expansion of virtual reality (VR) training programs. Further, DET has created policy, standardized worksite agreements, and updated monitoring practices as a part of its broader career pathways strategy.

DET is in the process of establishing a regularly occurring statewide youth practitioners call. The call will be hosted by DET on a quarterly basis and will bring together leaders from local workforce development boards (WDBs), career planners, and other youth serving organizations. This call will provide a forum for youth workforce development practitioners to receive technical assistance, disseminate best practices, network with one another, and improve the overall delivery of services to youth and young adults throughout the state.

For youth, access to training can be inhibited by lack of transportation or the hours of on-site training. The ability to pursue training options using virtual reality (VR) technology is pivotal to increasing opportunities for youth. DET is exploring options to use a portion of its Governor's set aside funds to support the implementation and/or expansion of VR training initiatives throughout the state. Evaluation of these initiatives will include determining if the VR improves employment and training outcomes and will provide a feedback loop to improve the use of VR training to meet youth employment needs.

Additionally, DET 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. Beginning in PY23, DET is implementing a shift to its monitoring practice that focuses monitoring activities less on administrative practices, and more on service delivery. As such, this new monitoring practice includes less review of documentation and more qualitative evaluation of the participant experience.

Also beginning in PY23, DET:

1. Requires each local WDB to provide a qualitative analysis of how it delivers all 14 youth program elements.
2. Interviews representatives from each local WDB to learn more about their delivery of Youth program services.
3. Selects individual program element(s) for more intensive monitoring, including a review of a random selected sampling of files for youth who engaged in 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. Collects information about how local WDBs are incorporating mental health initiatives into youth programming. Local WDB's are encouraged to included mental health assessments and mental health guidance for youth to reduce barriers to participation.

5. Evaluates how the Biden-Harris Good Jobs Initiative is incorporated into the development and implementation of WIOA Youth programming.

With respect to youth work experience (WEX), DET regularly monitors local WDB expenditures to ensure that, at a minimum, 20% of each annual WIOA Youth allocation is spent on paid and unpaid work experiences for ISY and OSY and that expenditures are in line with the regulatory guidance for this requirement.

Currently, a project is underway by DET to create a standardized Work Site Agreement template. The project was initiated upon request from local WDBs, and incorporated input from local WDB staff. DET anticipates that the use of this standardized template will reduce documentation errors, increase transparency, and minimize the paperwork burden on WEX placement sites.

DET is also working to improve partnerships between its WIOA Title I programming and its apprenticeship programming, beginning with a staff education campaign. DET has identified several misconceptions related to WIOA Title I and apprenticeship co-enrollments, as well as a general lack of knowledge among staff at state and field levels, that inhibit meaningful co-enrollment between these programs. By increasing staff knowledge of these programs, DWD-DET will build a foundation of support for increased co-enrollment and engagement.

4.ADDITIONAL ASSISTANCE CRITERION

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.

Wisconsin's state policy on “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for both in-school youth and out-of-school youth is outlined in DWD-DET's WIOA Titles I-A and I-B Policy and Procedure Manual Chapters 10.3.6:

<https://dwd.wisconsin.gov/wioa/policy/10/10.3.htm#sectionSix>.

Local Workforce Development Boards (WDBs) are not required to use criterion specified in WIOA § 129(a)(1)(B)(iii)(VIII) for out-of-school youth and WIOA § 129(a)(1)(C)(iv)(VII) for in-school youth as part of eligibility determinations. However, as Wisconsin's Governor's Council on Workforce Investment (CWI) 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.

Even if a local area chooses to use this category as part of ISY eligibility, no more than 5% 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. 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 five percent limitation. Any costs associated with serving participants who exceed the five percent limitation will be disallowed. In cases where the local WDB

exceeds the five percent limitation, participants' eligibility determination dates will be placed in chronological order and only the first 5% will be covered by the limitation.

If the WDBs choose to apply this criterion, DET will monitor for compliance during the annual Coordinated Monitoring process.

D. SINGLE AREA STATE REQUIREMENT

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)).

Wisconsin is not a single-area state. This section does not apply.

E. WAIVER REQUESTS

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)).

The State of Wisconsin, through the Wisconsin Department of Workforce Development (DWD) seeks approval of the following 10 statutory waivers in accordance with the Workforce Innovation and Opportunity Act (WIOA) at Section 189(i)(3) and the WIOA regulations at 20 CFR 679.600 through 679.640. These waiver requests will assist Wisconsin in achieving its vision that the state's workforce development system will advance the competitiveness of workers, job seekers, and employers in the global economy by improving equity, economic opportunity, and sustainability.

WAIVER REQUEST #1: OUT-OF-SCHOOL-YOUTH EXPENDITURE REQUIREMENT

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking to renew a waiver from WIOA Section 129(a)(4)(A) and 20 CFR Part 681.410, which require not less than 75% of funds available to local areas under subsection (c) shall be used to provide youth workforce investment activities for out-of-school youth (OSY). Wisconsin is requesting to lower the minimum OSY expenditure requirement for local formula funding to 50%.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver supports Wisconsin's goal to strengthen career pathways and career exploration opportunities while students are in K-12 and provide all students with the opportunity to participate in dual enrollment, earn a certificate/credential, or participate in work-based learning prior to high school graduation. As a result of this waiver, Wisconsin expects that the number of In-School-Youth (ISY) served will increase. Additionally, Wisconsin anticipates that performance accountability outcomes for overall WIOA Youth will remain steady or increase for the majority of the WIOA Youth Performance Indicators.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with USDOL priority of supporting career pathways and serving youth with barriers during secondary education. By serving youth and young adults earlier and during their education, Wisconsin's workforce system can support their engagement in education prior to disengagement, better positioning these future job seekers before they join the workforce.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

Both the education and workforce system will be able to provide the benefits of this waiver to Wisconsin's youth with barriers. In particular, due to the differences in eligibility requirements for OSY and ISY, increased enrollments of ISY would increase the number of low-income youth served.

6. Processes Used to:

- (A) Monitor Waiver Implementation Progress**
- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #2: IN-SCHOOL-YOUTH USE OF INDIVIDUAL TRAINING ACCOUNTS

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking to renew a waiver from WIOA regulation 20 CFR Part 681.550, which only allows Individual Training Accounts (ITAs) funded by WIOA youth funds to be used by out-of-school youth ages 16 to 24. Wisconsin is requesting that it be allowed to use WIOA youth funds for ITAs for in-school youth ages 16 to 21.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver supports Wisconsin's goal to strengthen career pathways and career exploration opportunities while students are in K-12 and provide all students with the opportunity to participate in dual enrollment, earn a certificate/credential, or participate in work-based learning prior to high school

graduation. As a result of this waiver, Wisconsin expects that the number of in-school-youth (ISY) serviced will increase. Additionally, Wisconsin anticipates that performance accountability outcomes for overall WIOA Youth will remain steady or increase for the majority of the WIOA Youth Performance Indicators.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor priority of supporting career pathways and serving youth with barriers during secondary education. By providing flexibility and greater consumer choice for ISY interested in training, more Youth Program participants can receive training for in-demand occupations, becoming better prepared to join the workforce upon completion of their schooling.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

Wisconsin's in-school-youth who are low income and experience other barriers would benefit from this waiver, which would provide greater training opportunities during their educations.

6. Processes Used to:

- (A) Monitor Waiver Implementation Progress**
- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #3: INCUMBENT WORKER TRAINING EXPENDITURE LIMIT

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver from WIOA Section 134(d)(4)(A)(i) and WIOA regulation 20 CFR 680.800(a), which limits local boards to reserving only 20% of their combined total of adult and dislocated worker formula funds for Incumbent Worker Training. Wisconsin is requesting that local boards be allowed to use up to 50% of their combined adult and dislocated worker formula funds for the provision of Incumbent Worker Training.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver supports Wisconsin's goal of focusing on employers in order to engage them to drive, build, and utilize the state's workforce development system. In program years (PY)21 and 22, 291 individuals received Incumbent Worker Training in Wisconsin. As a result of this waiver, Wisconsin expects that the number of workers who receive Incumbent Worker Training will increase and that the number of employers participating in Incumbent Worker Training activities will increase.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor 's Yes, WIOA Can initiative by removing barriers to participation for interested businesses and connecting them with the workforce system's resources.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

The waiver would benefit both workers and employers by increasing their competitiveness in a global market and serving as a tool for layoff aversion. By providing Incumbent Worker Training as a tool to businesses that may otherwise be faced with making workforce reductions, this waiver would allow those businesses to retain workers who have been retrained in new occupational skills. A stronger, deeper talent pipeline of skilled workers benefits Wisconsin businesses, as well as the state's economy.

6. Processes Used to:

(A) Monitor Waiver Implementation Progress

(B) Provide Notice to Local Boards

(C) Provide Local Boards Comment Opportunity

(D) Ensure Meaningful Public Comment

(E) Collecting and Report Waiver Outcome Information in Annual Report

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #4: INCUMBENT WORKER TRAINING 6-MONTH EMPLOYMENT REQUIREMENT

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver from WIOA regulation 20 CFR Part 680.780, which requires that an incumbent worker have an established employment history with the employer for six months or more.

Wisconsin is requesting that it be allowed to eliminate the six-month employment requirement in its definition of incumbent worker.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver supports Wisconsin's goal of focusing on employers in order to engage them to drive, build, and utilize the state's workforce development system. In PYs 21 and 22, 291 individuals received incumbent worker training in Wisconsin. As a result of this waiver, Wisconsin expects that the number of workers who receive Incumbent Worker Training will increase and that the number of employers participating in incumbent worker training activities will increase.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor's Yes, WIOA Can initiative by removing barriers to participation for interested businesses and connecting them with the workforce system's resources.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

The waiver would benefit both workers and employers by increasing their competitiveness in a global market and serving as a tool for layoff aversion. The waiver would benefit both workers and employers by increasing their competitiveness in a global market and serving as a tool for layoff aversion. By providing incumbent worker training as a tool to businesses that may otherwise be faced with making workforce reductions, this waiver would allow those businesses to retain workers who have been retrained in new occupational skills. A stronger, deeper talent pipeline of skilled workers benefits Wisconsin businesses, as well as the state's economy. By eliminating the need for a worker already employed by a business to wait six months before being able to participate in Incumbent worker training, this waiver would increase access for employed workers to learn new skills at their place of employment.

6. Processes Used to:

- (A) Monitor Waiver Implementation Progress**
- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local

Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #5: ON-THE-JOB TRAINING EMPLOYER REIMBURSEMENT RATE LIMIT

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver from WIOA Section 134(c)(3)(H)(i) and WIOA regulation 20 CFR 680.720(b), which allows reimbursement rates of up to 75% to employers of on-the-job training. Wisconsin is requesting to increase on-the-job training (OJT) employer reimbursement up to 90% for business with 50 or fewer employees.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver supports Wisconsin's goal of focusing on employers in order to engage them to drive, build, and utilize the state's workforce development system. In PYs 21 and 22, 100 Adult Program participants, 17 Dislocated Worker Program participants, and 23 Youth Program participants in Wisconsin received on-the-job training. As a result of this waiver, Wisconsin expects that the number of Adult, Dislocated Worker, and Youth Program participants who receive on-the-job training will increase and that the number of employers participating in on-the-job training services will increase. This waiver would expand opportunities for adults from all populations to participate in on-the-job training, whether as a standalone service or as part of an apprenticeship, in order to access to meaningful, family-sustaining employment.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor's Yes, WIOA Can initiative by removing barriers to participation for interested businesses and connecting them with the workforce system's resources.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

The waiver would benefit both job seekers and employers. Job seekers starting in new occupations or industries would have greater training opportunities. The waiver would be especially beneficial to small businesses including new start-ups as a cost-effective incentive to utilize the proven method of utilizing OJTs to hire and train new workers. Participants of Wisconsin's Title I-B programs would benefit from increased access to Registered Apprenticeships, as this waiver would allow more small businesses to take advantage of the opportunity to sponsor a Registered Apprenticeship program.

6. Processes Used to:

- (A) Monitor Waiver Implementation Progress**
- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each

affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #6: TRANSITIONAL JOBS EXPENDITURE LIMIT

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver from WIOA Section 134(d)(5) and WIOA regulation 20 CFR Part 680.195, which limits local boards to reserving only 10% of their combined total of adult and dislocated worker formula funds for transitional jobs. Wisconsin is requesting that local boards be allowed to use up to 30% of their combined adult and dislocated worker formula funds for the provision of transitional jobs.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver supports Wisconsin's goal of focusing on employers in order to engage them to drive, build, and utilize the state's workforce development system. As a result of this waiver, Wisconsin expects that the number of Adult and Dislocated Worker Program participants who receive transitional job services will increase. In PYs 21 and 22, no Adult or Dislocated Worker Program participants in Wisconsin received a transitional job service.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor's Yes, WIOA Can initiative; in particular, the stated commitment to measuring success not just by if a worker gets a job, but whether the most vulnerable workers get connected to good jobs.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

The waiver would benefit both job seekers and employers including job seekers with significant barriers to employment and are chronically unemployed or have an inconsistent work history. Employers needing workers may find the use of transitional jobs to be an incentive for hiring individuals with an inconsistent work history or who are chronically unemployed. The waiver also supports Wisconsin's increased efforts to deepen the partnerships between the WIOA Title I-B programs and other workforce system partners, such as TANF, FoodShare Employment and Training programs, and Community Action Programs, by allowing more WIOA funding to be leveraged to provide transitional job services to common customers, many of whom are experiencing multiple barriers to employment.

6. Processes Used to:

(A) Monitor Waiver Implementation Progress

- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #7: ADDITIONAL ELIGIBILITY REQUIREMENTS FOR DISLOCATED WORKERS RECEIVING NEEDS-RELATED PAYMENTS

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver from WIOA Section 134(d)(3)(B) and WIOA regulation 20 CFR 680.950(a)(2), which place additional eligibility requirements for needs-related payments for a dislocated worker who is unemployed and does not qualify for (or has ceased to qualify for) unemployment and is receiving training services. Wisconsin is requesting that it be allowed to establish via state policy uniform eligibility requirements for Adult and Dislocated Worker Program participants to receive needs-related payments using only the eligibility requirements of WIOA Section 134(d)(3)(A).

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

As a result of this waiver, Wisconsin expects that the number of Dislocated Worker Program participants who receive needs-related payments will increase. In PYs 21 and 22, no Dislocated Worker Program participants in Wisconsin received needs-related payments. Wisconsin also anticipates that, if increased use of needs-related payments is achieved, performance accountability outcomes for WIOA Dislocated Workers will increase.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor's Yes, WIOA Can initiative; in particular, the stated commitment to providing access to supportive services to enhance workers' opportunities for growth and success.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

This waiver would simplify eligibility requirements and processes for needs-related payments for dislocated workers – those who are experiencing multiple barriers to re-employment and/or who are facing economic crises would especially benefit from this waiver.

6. Processes Used to:

- (A) Monitor Waiver Implementation Progress**
- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #8: REQUIREMENT THAT ANNUAL STATE FISCAL MONITORING BE ONSITE

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver from the requirement within WIOA Section 184(a)(4) and WIOA regulation 20 CFR 683.410(b)(2)(i) that specifies annual monitoring of each local area to ensure compliance with the uniform administrative requirements referred to in WIOA Section 184(a)(3) be onsite. Wisconsin is requesting that it be allowed to conduct its annual monitoring of each local area for compliance with the uniform administrative requirements virtually.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver would promote cost-effectiveness and efficiency in state government operations by allowing fiscal monitors to conduct annual monitoring virtually. Wisconsin has determined that there are no elements of the annual monitoring that require onsite presence. Secured data-sharing practices have been established for pre-monitoring desk reviews and would serve as a means to facilitate complete and thorough transmission of required documents needed for monitoring. In addition, this waiver would provide cost-effectiveness and efficiency for local area staff who travel to a different office location within the workforce development area to meet with monitoring staff by allowing them to engage in monitoring virtually.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor's interest in streamlining administrative processes to promote effective government activities.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

This waiver is intended to assist state government and local area staff by allowing for more streamlined monitoring practices. Cost savings would allow the state greater administrative funds to use innovatively.

6. Processes Used to:

- (A) Monitor Waiver Implementation Progress**
- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #9: ISY LOW-INCOME LIMITATION

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver from WIOA Section 129(a)(3)(A)(ii) and 20 CFR 681.250(c), which limits local areas to serving only 5% in-school-youth (ISY) who are not low income. Wisconsin is requesting to raise the limit of ISY participants who do not have to be low-income to 10%.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

Wisconsin's intent in seeking this waiver is to increase flexibility for local boards to serve ISY who might otherwise be eligible for the program due to their barriers to employment but are determined ineligible due to their income. This waiver supports Wisconsin's goal to strengthen career pathways and career exploration opportunities while students are in K-12 and provide all students with the opportunity to participate in dual enrollment, earn a certificate/credential, or participant in work-based learning prior to high school graduation. As a result of this waiver, Wisconsin expects an increase in the number of in-school-youth (ISY) who are enrolled.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor's priority of advancing equity by ensuring youth have equal access to services and supports to achieve positive outcomes in high quality education and training. By serving more ISY who have barriers but are not low income, Wisconsin's local boards can provide greater accessibility to those in-school youth in their local areas.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

In-school youth who are not low income but who have any of the eight barriers required for eligibility (basic skills deficient; English Language Learner; offender or ex-offender; homeless/runaway; foster care; pregnant or parenting; has a disability; and requires additional assistance) would benefit from this waiver, as it would allow more than the current 5% to enroll into the program.

6. Processes Used to:

- (A) Monitor Waiver Implementation Progress**
- (B) Provide Notice to Local Boards**
- (C) Provide Local Boards Comment Opportunity**
- (D) Ensure Meaningful Public Comment**
- (E) Collecting and Report Waiver Outcome Information in Annual Report**

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

WAIVER REQUEST #10: BUSINESS CAPITALIZATION

1. Statutory or Regulatory Requirement(s) for which a Waiver is Requested

Wisconsin is seeking a waiver of the limitation on the use of funds for capitalization of business under WIOA Section 181(e) to allow funds to be used to capitalize small business, up to \$10,000 per affected business.

Using the lessons learned from the COVID-19, in which marginalized businesses were disproportionately impacted by the disaster, the Wisconsin Department of Workforce Development (DWD) requests a WIOA waiver of the limitation on the use of funds for capitalization of business under WIOA Section 181(e) to allow Governor's Reserve, Adult and Dislocated Worker, and National Dislocated Worker Grants funds to be used to capitalize small business that are affected by qualifying disasters, up to \$10,000 per affected business. This waiver will allow the state to assist disaster-affected business and create new employment

opportunities. Under the waiver, individuals benefiting from the capitalization must complete entrepreneurial or microenterprise training.

The use of funds that will be allocated under this waiver is limited to emergency, disaster-related needs only. For example, businesses may use the funds to purchase a computer for contacting customers and reestablishing payroll records, lease a building for operations, buy supplies and materials, or for fees and tuition payments for operating licenses or staff certification and training.

The following conditions would apply to the use of funds for small business capitalization if this new waiver request were approved:

1. Wisconsin DWD will develop a Business Capitalization waiver policy that outlines eligibility requirements for WDBs to follow when allow for use of Business Capitalization funds for participants/small businesses.
2. Grant assistance must be limited to no more than \$10,000 per individual/business.
3. Use of funds to cover salaries is not permitted.
4. Use of funds for business capitalization revolving loans is not permitted.
5. Businesses must retain receipts after the item/service(s) is/are provided, to ensure accountability for costs incurred.
6. DET financial systems in place to track funds approved under this Business Capitalization waiver, as well as the responsibility to recapture funds that were not used by eligible businesses in instances where the final receipt is less than the original estimate.
7. The DET Program, Governance, and EO Compliance Unit is required to monitor the implementation of this waiver.

2. Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. Wisconsin regulations and policy statements follow current federal law and regulations.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver supports Wisconsin's goal of focusing on employers in order to engage them to drive, build, and utilize the state's workforce development system. The expected outcomes from this waiver are as follow:

- Support Wisconsin's small business and entrepreneurial start-up economy;
- Accelerate the economy and the labor market restoration;
- Achieve the restart or maintain operation in 90% of the businesses impacted by the capitalization funds;
- Avoid layoff of employees of small and medium business affected by emergencies; and
- Increase supports for participants with entrepreneurial goals.

4. Alignment with U.S. Department of Labor (USDOL) Policy Priorities

This waiver aligns with U.S. Department of Labor's Yes, WIOA Can initiative by removing barriers to participation for interested businesses and connecting them with the workforce system's resources. In particular, this waiver aims to:

- Increase business usage of the workforce system flexibilities and thereby achieve greater access to employment opportunities; and
- Create additional opportunities for new workers, and for unemployed and underemployed workers to speed their return to full-time employment.

5. Individuals Affected by the Waiver and Service Impacts for Disadvantaged Populations or Individuals with Multiple Barriers to Employment

- Businesses, particularly small and medium-sized businesses needing to retain current workers, and/or hire additional workers to sustain or expand their productivity, but do not have immediate resources to do so;
- Small business employees who will be able to retain their jobs; and
- Unemployed and underemployed workers.

6. Processes Used to:

(A) Monitor Waiver Implementation Progress

(B) Provide Notice to Local Boards

(C) Provide Local Boards Comment Opportunity

(D) Ensure Meaningful Public Comment

(E) Collecting and Report Waiver Outcome Information in Annual Report

Wisconsin has a robust data collection, data validation, and monitoring system in place that will be employed to collect necessary information and monitor the implementation of this waiver. Waiver-related information will be collected in the following ways:

- Programmatic, participant-specific data will be entered in Wisconsin's Automated System Support for Employment and Training (ASSET) system by program staff in real time.
- Financial information will be maintained by the local WDBs and provided to the state on a monthly basis via submission in Wisconsin's Contract Management and Expenditure Tracking (COMET) system.

Both programmatic and financial information are monitored on a monthly basis to track expenditure rates, gauge progress toward achieving negotiated levels of performance, and ensure data integrity. Programmatic and financial information are monitored more thoroughly on an annual basis through on-site reviews at each for the 11 workforce development areas.

If approved, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and inclusion during annual monitoring. Annual waiver outcome information will be collected from each affected local Workforce Development Board (WDB) within 60 days of the conclusion of each program year.

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the Wisconsin Department of Workforce Development is submitting this waiver request as part of its PY 24 – PY 27 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. As such, these waiver requests were posted on DWD's website for review and comment by required parties and system stakeholders, including all local Workforce Development Boards and their association, the Wisconsin Workforce Development Association, business, organized labor, and the general public, from Jan. 17, 2024, through Feb. 16, 2024.

TITLE I-B ASSURANCES

	The Unified or Combined State Plan must include assurances that:	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 has 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

**PROGRAM-SPECIFIC REQUIREMENTS
WAGNER-PEYSER ACT PROGRAM (EMPLOYMENT SERVICES)**

A. EMPLOYMENT SERVICE STAFF

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.

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;
- Staff in-person and virtual, 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 local Workforce Development Boards (WBDs), 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.

Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Service and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication.

Although UI and Job Service are both DWD programs, they are administered by different divisions, each with specific staff addressing specific unemployment eligibility issues.

Professional staff in each area communicate regularly and coordinate any UI law, program, or service changes. Job Service staff notify 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 the potential concerns of a claimant.

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 a job center. Ensuring staff is equipped with the most current UI information to assist customers is a 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 make that recommendation 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 the UI Division, 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 insurance, it is a requirement in Wisconsin they register on the state labor market exchange, JobCenterofWisconsin.com (JCW), 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. Claimants are assigned to one of the following paths based on the results of the self-assessment:

- a. Path A: Work Ready – Job Service intervention not required. Claimants referred to online resources and local job center services but are not required to participate for continued UI eligibility.
 - b. Path B: In-person or virtual re-employment session with Job Service staff required for continued UI eligibility. The session includes a group meeting followed by a one-on-one consultation with 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 Job Service to provide any additional information, support, and potential referrals to accomplish the outcomes outlined by the job seeker.
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 15 Comprehensive and 19 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 Wisconsin Department of Corrections facilities.

- Referrals to online 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 WAGNER-PEYSER ACT FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN THE EMPLOYMENT SERVICE AND UI, AS APPROPRIATE

D.1

Wagner-Peyser funded (Job Service) staff listen to a 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 the state's labor exchange website – JobCenterofWisconsin.com (JCW). By registering on JCW, 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 insurance system, which includes reviewing a claimant's work search activities and notifying UI of potential eligibility issues for further review and possible adjudication.

D.2

To receive unemployment insurance (UI) benefits, Wisconsin requires UI claimants to be registered on the state labor market exchange, JobCenterofWisconsin.com (JCW), within 14 days of their initial claim. A completed registration includes building or uploading a resume to facilitate job matching within the JCW system. Assistance as previously described is provided to claimants if needed and failure to register creates an indefinite suspension for 30 months or until registration is completed.

D.3

Wagner-Peyser (Job Service) staff are also trained to administer the work test for the state unemployment insurance (UI) system. Administering the work test 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 Job Service Licensed Career Counselor for assessments to assist in determining personal characteristics, experience, and education as a way to match them 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 online 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.4

A statewide network of job centers provides access to 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;
- Office of Veterans Employment Services (OVES) services available and referrals to Disabled Veteran Outreach Program (DVOP) staff;
- On-site technical college services for GED assistance and other educational opportunities and options;
- Job Service Employment and Training Specialists provided 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

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.

The Wisconsin Department of Workforce Development, "department", has identified the unique needs of farmworkers based on past and projected agricultural and farmworker activity in Wisconsin to include the greater likelihood that workers will face food insecurity when they arrive in Wisconsin based on the growing season. The majority of migrant farmworkers who travel to Wisconsin to work, who are not H-2A workers, come to work in food processing facilities. Food processing facilities begin work usually in mid-June these workers are also eligible for Unemployment Insurance after the season. Housing can be difficult to secure for non-H-2A mobile migrants. Employer provided housing is limited and securing off-site housing has been increasingly difficult. Employer provided family housing is minimal and workers who must bring their families with them to Wisconsin to work, have a hard time securing housing and child care.

H-2A workers lack of personal transportation, community connections, and a familiarity with legal and social structures create a different type of need for this population. They are completely reliant on an employer or migrant labor contractor for food, housing, medical care, and cultural and geographical navigation. H-2A workers need additional support understanding their rights, it may be harder to H-2A workers to trust MSFW Outreach Specialists and MSFW partner agencies. Additionally, the visa process and requirements are complicated, and workers often have questions that the department and partner agencies are not able to answer or do not have a referral agency to assist leaving H-2A workers to make complicated decision in a foreign country without support.

Since Wisconsin is a more northern state, the growing season begins later than other states and it is more likely that workers will have exhausted their Unemployment Insurance benefits before traveling to Wisconsin for work. Many workers arrive without money for food before the work begins and rely on food banks and other supportive food services for the first few weeks when they arrive.

Migrant farmworkers are also less likely to stay in Wisconsin and participate in a workforce training program because of the climate. During outreach visits with migrant and seasonal farmworkers (MSFW), MSFW Outreach Specialists report that workers are not interested in staying in Wisconsin permanently and participating in employment and training services due to the winter weather in Wisconsin.

2. ASSESSMENT OF AGRICULTURAL ACTIVITY IN THE STATE

Provide an assessment of the agricultural activity in the State: 1) identify the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity;

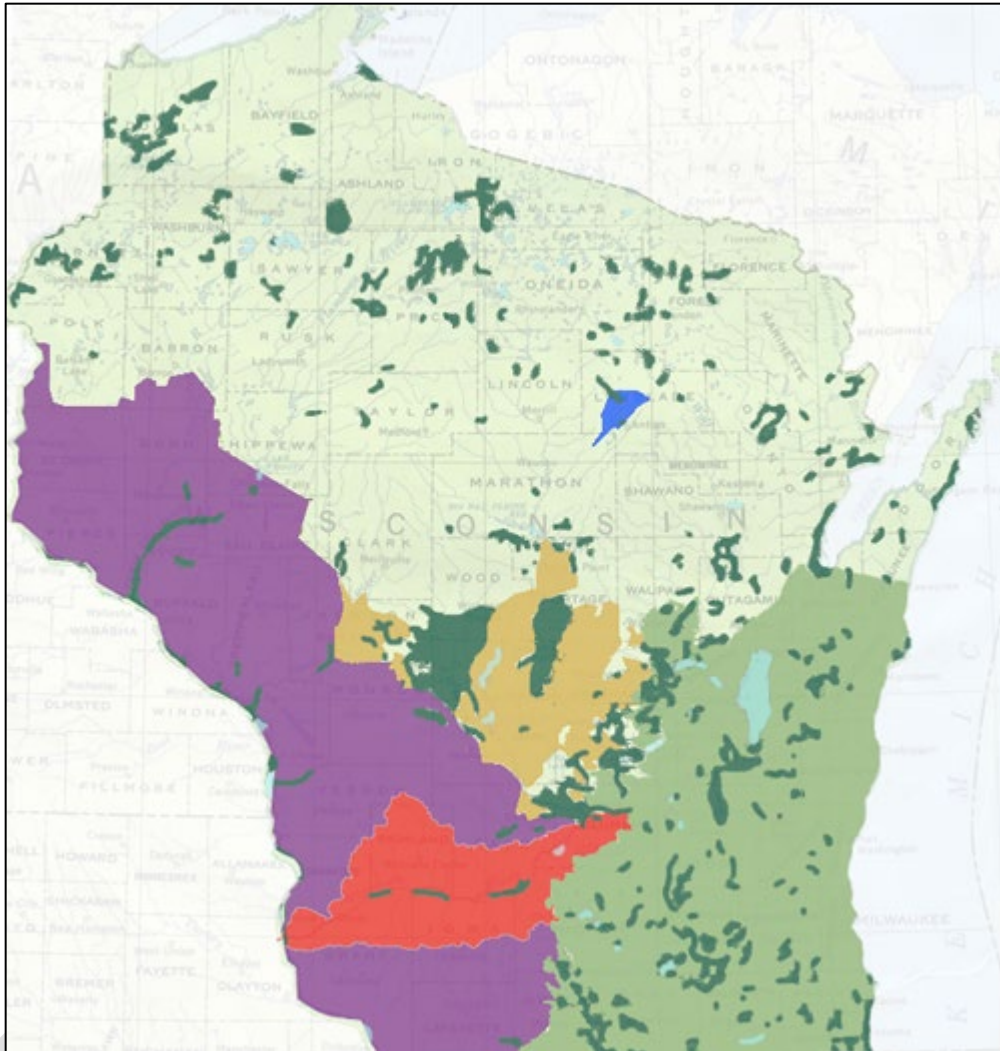
The State of Wisconsin's five most labor-intensive crops with the most acres harvested are potatoes, cranberries, cucumbers, apples, and ginseng.

AOP Chart 1: Fruit and Vegetable Crops by Most Acres Harvested (Most Labor-Intensive Crops in BOLD)

Agricultural Commodity	Acres Harvested
POTATOES	70,110
BEANS	63,842
SWEET CORN	56,615
PEAS, GREEN, (EXCL SOUTHERN)	22,029
CRANBERRIES	21,514
CUCUMBERS	5,903
BEANS	4,978
APPLES	4,673
CABBAGE	4,593
CARROTS	4,210
BEETS	4,070
PUMPKINS	3,401
PEAS, CHINESE (SUGAR & SNOW)	1,873
ONIONS	1,829
SQUASH	1,326
GINSENG	962

United States Department of Agriculture, National Agricultural Statistics Service, Census of Agriculture, 2017 Census Volume 1, Chapter 2: County Level Data

AOP Chart 2: Vegetable Growing Regions in Wisconsin



*University of Wisconsin-Madison, Vegetable Crop Entomology, Extension and Research
 (<https://vegento.russell.wisc.edu/regions/>)*

As shown in AOP Chart 2, there are six main vegetable production regions in Wisconsin: **Central Sands (light brown)**, **Driftless Area (purple)**, **Lower Wisconsin River (red)**, **Muck (dark green)**, **Antigo Flats (light blue)**, and **The Ripon Plain (dark green)**. Potatoes are grown in the Central Sands, Lower Wisconsin River, and Antigo Flats regions. Potato harvest can begin as early as June and continue through August and September.

The concentration of cucumbers growth is in the central part of the Ripon Plain growing region in Waushara County and tend to be harvested July through September. Ginseng is primarily grown in three north central counties: Lincoln, Marathon, and Portage. Ginseng is harvested in fall however the ginseng must be replanted each year. Planting, care, harvest, and preparation before market requires workers to tend to them from April through December.

Apple orchards are spread across Wisconsin in various growing regions with hundreds of acres in the Driftless Area and The Ripon Plain. There are also hundreds of acres in the colder northern regions that

have shorter growing seasons. The most demanding part of the year for apple orchards are August through December.

AOP Chart 3: Counties with the highest apple growth by acre

County	Acres of Apples
Door	400
Crawford	371
Trempealeau	340
Richland	248
Bayfield	243
Chippewa	207
Racine	207
Ozaukee	193
Dane	185
Walworth	181
Polk	121
Sheboygan	116
Brown	107
Iowa	94

United States Department of Agriculture, National Agricultural Statistics Service, Census of Agriculture, 2017 Census Volume 1, Chapter 2: County Level Data

Cranberries are grown in the central to west-central part of Wisconsin in parts of the Central Sands, Driftless Area, and Muck growing regions. Harvest season for cranberries typically begins in late September and runs until mid-October but is dependent on weather throughout the growing season.

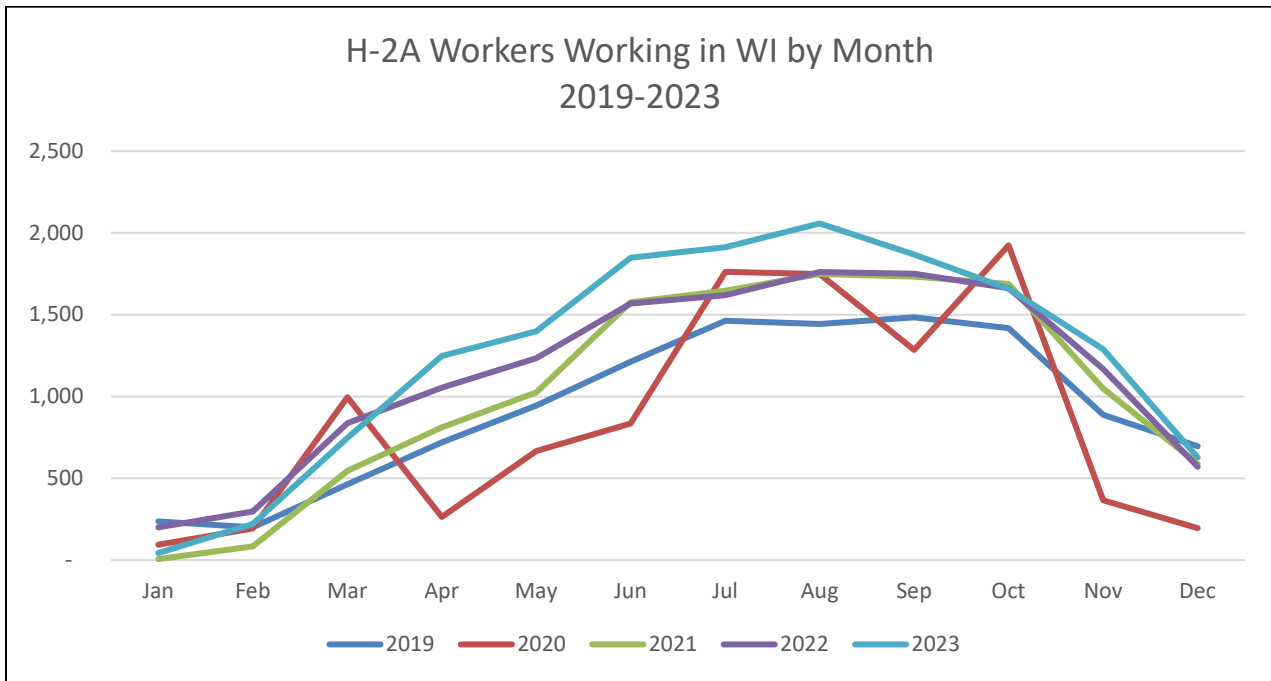
AOP Chart 4: Counties with cranberry growth by acre

Counties	Acres of Cranberries
Wood	6,199
Monroe	3,601
Jackson	3,528
Juneau	2,835
Portage	906
Oneida	840
Sawyer	426

United States Department of Agriculture, National Agricultural Statistics Service, Census of Agriculture, 2017 Census Volume 1, Chapter 2: County Level Data

The months of heavy activity for mobile migrant workers, non-H-2A visa workers who travel for farmwork, are mid-June through late-September as large food processing facilities pack beans, carrots, peas, beets, potatoes, and cabbage as they are harvested. The majority of mobile migrant workers are working seasonally in this type of agricultural capacity. The months of heavy activity in food processing facilities also mirrors the months of heavy activity for the number of approved H-2A workers. The months of June through September also see the highest number of H-2A workers in the state.

AOP Chart 5: Number of H-2A Workers Working in Wisconsin by Month, 2019 -2023



Data is based on the number of H-2A workers approved by DOL and dates of need reported by employer on ETA-790.

Summary of the Agricultural Employers' Needs in the State

The demand for hiring foreign workers continues to increase in Wisconsin. The number of employers who are requesting H-2A visas and the total number of workers requested continues to increase. Most of the agricultural work, working directly with planting, tending, and harvesting crops, that was once done by mobile migrant workers is now being done by workers who have H-2A visas. There are less mobile migrant workers and those who travel from Texas, Florida, and northern Mexico are working in food processing facilities and not interested in agricultural work.

Food processing facility employers are also finding it harder to hire local workers and workers from other states where mobile migrant workers traditionally travel from to come to Wisconsin to work. Food processing facility employers have expressed frustration that they are not able to utilize the H-2A visa program to access additional workers for their facilities.

Seasonal workers are also harder to find with high school students not as interested in farm labor as in the past. Preliminary employment estimates for June 2023 showed Wisconsin's total labor force participation rate is 65.3% which is 2.7% higher than the national average. This means there are more people already working and less for employers to recruit. It is also harder to recruit workers for seasonal positions vs year-round jobs.

Economic, natural, or other factors affecting agriculture in the State or any projected factors that will affect agriculture in the State.

The uncertainty of climate change continues to have an impact on the agricultural industry. The increase in temperatures, drought, flooding, and air quality all impact the growing season and make harvest times

difficult to predict. It also makes harvest time more difficult as workers need more breaks in the increasing heat and poor air quality.

3. ASSESSMENT OF NEEDS OF FARMWORKERS

Provide an assessment of the unique needs of farmworkers by 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.

Migrant and seasonal farmworkers (MSFW) in Wisconsin include a majority of workers who travel from Texas, Florida, and northern Mexico who primarily speak Spanish. Seasonal workers also tend to be migrant workers who have stayed in Wisconsin near the seasonal agricultural work and speak primarily Spanish. There is a large food processing facility that hires migrant workers from Haiti who speak French Creole.

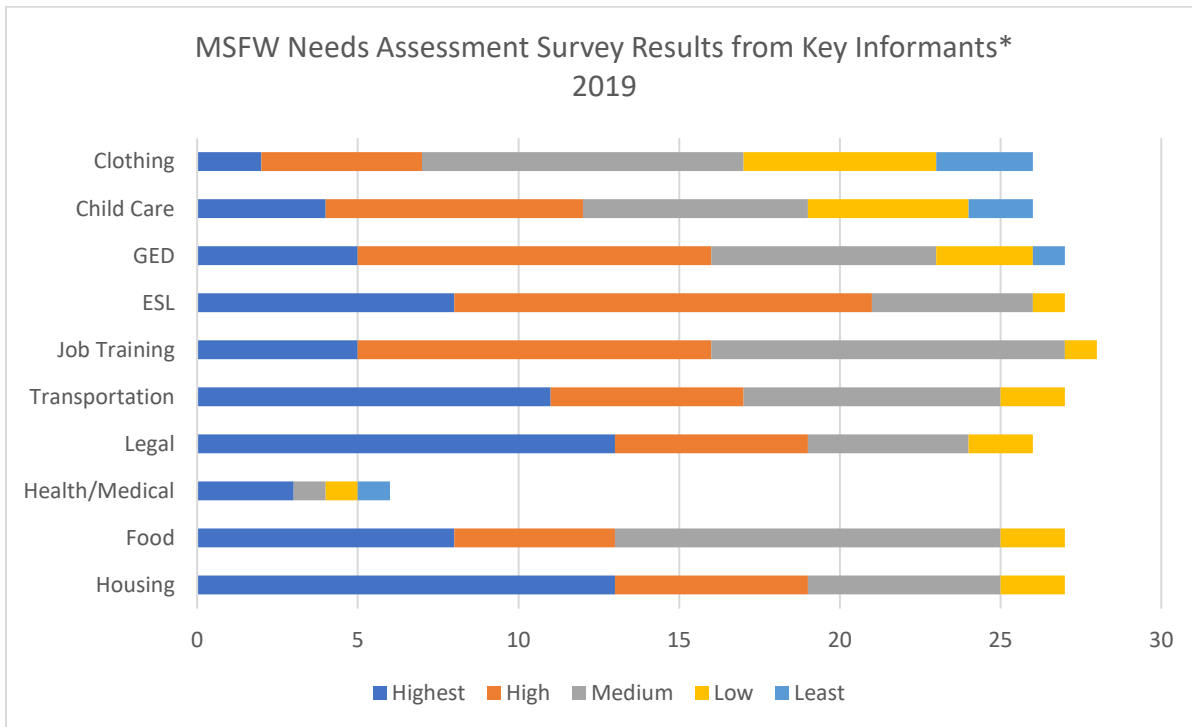
The majority of H-2A workers are from Mexico and speak Spanish. There are also a lot of H-2A workers from South Africa who speak English.

The peak season from June – September will see about 3,500 mobile migrant workers, the majority of whom are working in food processing facilities and about 2,000 H-2A visa workers (see AOP Chart 4) for a total of approximately 5,500 migrant workers in Wisconsin during peak season.

During non-peak season, spring months bring only a couple hundred mobile migrant workers and 750-1,500 H-2A visa workers. Winter months bring very few mobile migrant workers and only a couple hundred H-2A visa workers.

The National Farmworker Jobs Program (NFJP) in Wisconsin is United Migrant Opportunity Services (UMOS). UMOS has the NFJP grant and a number of other grants that assist migrant and seasonal farmworkers including running a migrant Headstart program. UMOS conducted an MSFW needs assessment. They completed two surveys regarding MSFW needs. One surveyed Key Informants, MSFW partners and service providers, and asked them to rank the needs of MSFWs. The second survey was a survey of MSFW and asked them to rank their needs.

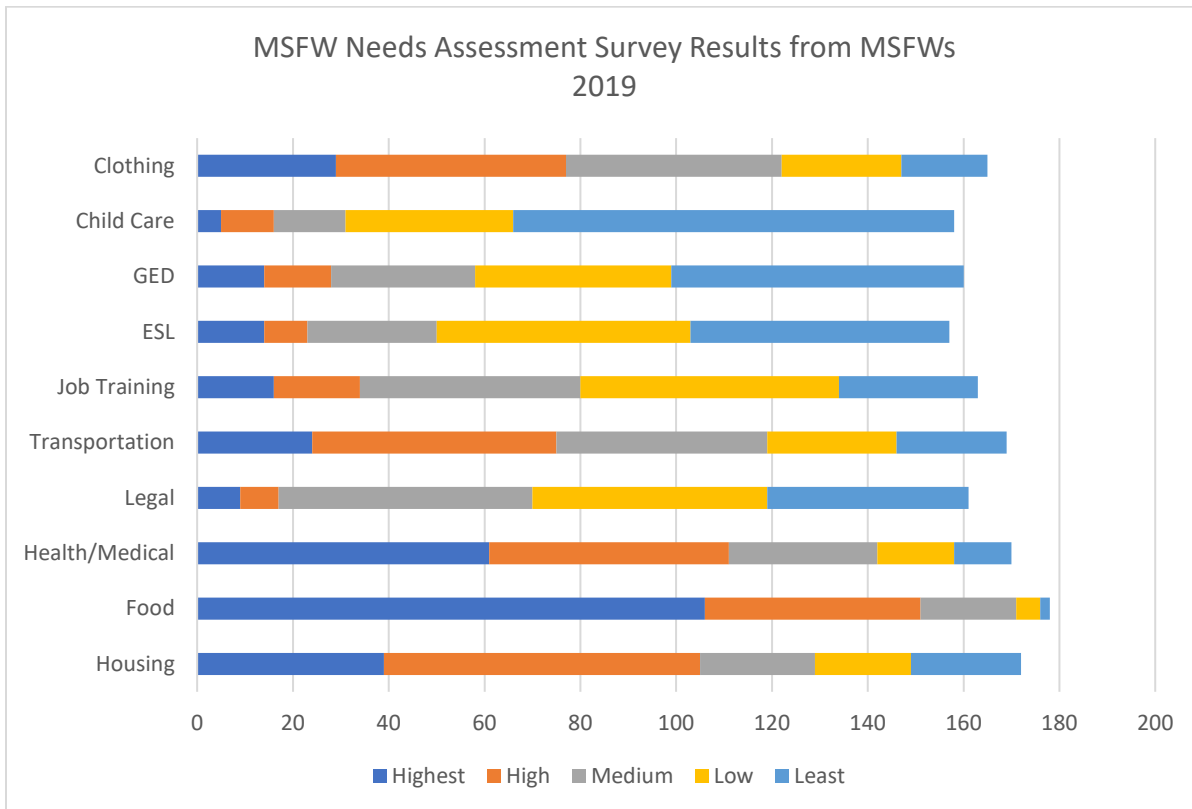
AOP Chart 6: NFJP Needs Assessment Survey, Key Informants



*Survey conducted by NFJP. *NFJP partner agencies who work with the MSFW population were asked what they see as far as what the farmworkers need.*

AOP Chart 7: NFJP Needs Assessment Survey, MSFWs

DRAFT



The survey indicates that MSFWs rank their greatest needs as food, health/medical, and housing. The Key Informants ranked ESL, legal, and food as the top three.

As indicated above, the department has also identified food insecurity as a need for MSFWs particularly mobile migrant workers. H-2A visa workers tend to not request food assistance as often as mobile migrant workers. H-2A visa workers make more money and usually have longer contracts than mobile migrant workers. They are also provided free housing and reimbursed travel. These factors appear to lead to less food insecurity for H-2A visa workers.

Health/medical care are needs for all MSFWs. Many do not have medical insurance and finding care in rural areas can be difficult. Worker's compensation can take a time to pay out or get approved which means workers are without pay while injured. Workers are also more concerned about their health and the spread of illnesses since COVID-19 had a devastating impact on farmworkers.

Housing is a concern for mobile migrant workers. Some employers do not provide housing or do not have enough housing for all of their workers. Area housing for these workers is harder and harder to find; rentals are increasing in prices across all areas of Wisconsin, renting for less than a year is often unappealing to landlords, and there are less available units in many areas across the state. All employer provided housing is inspected by the department as required under the State of Wisconsin's migrant labor law, but non-employer provided or non-migrant only housing is not. This can result in mobile migrant workers living in unsanitary or unsafe housing conditions.

All H-2 visa workers must be provided free housing by their employer. This housing is inspected by the department, so housing is less of a need or concern for H-2 visa workers.

The needs assessment based on the Key Informant's survey highlights a difference in what partners think MSFWs need vs what MSFWs themselves think they need. The Key Informants ranked ESL and Legal in the top two needs but MSFWs ranked them at the bottom. It may be that Key Informants can see the benefits MSFWs could have with better access to these services that would help improve the MSFWs situation overall while the MSFWs are focused on the most basic needs.

4. OUTREACH ACTIVITIES

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

The department plans to conduct robust outreach to all MSFWs. The MSFW Outreach Specialists are bilingual in Spanish and English and are Employment and Training Specialists who conduct outreach in their local areas. Wisconsin was identified as a significant state in PY2023 which requires that the state have full-time year-round outreach staff. The department has two full-time year-round MSFW Outreach Specialists who travel to visit MSFWs where they live, work, and gather to conduct outreach activities.

The significant one-stop center, the Dane County Job Center, has employment and training specialists trained in the specific needs of MSFW working at the one-stop including bilingual staff. Rigorous outreach is conducted in the workforce development area that the one-stop services to ensure MSFWs are learning of the services offered at the one-stop.

Virtual services are also available to MSFWs not being served by normal intake activities conducted by the employment services offices. MSFW outreach staff share information about the services available at the job centers which includes contacts for bilingual Employment and Training Specialist throughout the state who can be contacted over the phone or through an online platform to provide employment services at a time and location convenient to the MSFW.

The department is structured so that the administration of the state's migrant labor law, the foreign labor certification coordinator, and the administration of the Wagner-Peyser outreach requirements are within the Program and Planning Section. The MSFW Outreach Specialists are located in the local Job Service (employment services) offices. The MSFW Outreach Specialists and managers coordinate with the Program and Planning Unit Manager and team to organize, communicate, and work together to service MSFWs. MSFW Outreach Specialists and their supervisors plan weekly outreach to MSFWs and share their plan with the Program and Planning Section Chief for feedback.

The state's migrant labor law and the requirements of the H-2A program require that all migrant housing is inspected by the department. The location of migrant worker housing and the employers is shared with the team. The list of migrant housing locations is one way MSFW Outreach Specialists are able to locate MSFWs.

The state's migrant labor law also includes a Governor's Council on Migrant Labor with includes employer representatives and migrant worker advocates. The council provides a connection to large food processing facilities and helps create a good working relationship with these employers who often invite the department to their seasonal worker orientation for outreach workers to provide outreach

information. This allows the department to connect with migrant and seasonal workers who are not reached through normal intake activities conducted by the employment service offices.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF.

Describe the State agency's proposed strategies for providing technical to outreach staff. Technical Assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

MSFW Outreach Specialists receive annual training with technical assistance on collaboration with other organization, the Employment Service and Employment-Related Law Complaint System, basic summary of worker rights, and other outreach specific information.

The Program and Planning Section also hosts a pre- and post- season meeting with other organizations serving MSFWs in the area. The meetings include information about the various programs and how to make referrals and connect MSFWs to these other programs. Annual meetings and trainings are held with the NFJP provider and with the UMOS Anti-Human Trafficking team. Additionally, all staff in the Program and Planning Section and MSFW Outreach Specialists receive annual training with the Equal Employment Opportunity Commission, DOL Wage and Hour Division, the department's Equal Rights Division, and the Occupational Safety and Health Administration to understand employment laws and potential violations and to discuss how to make appropriate referrals.

Locally, MSFW Outreach Specialists attend Job Service meetings with other Employment and Training Specialists that include information on the other one-stop partners and how to connect to other one-stop services. The Bureau of Job Service also has a monthly virtual meeting for all Bureau staff that include trainings, policy and program updates, and other technical assistance for MSFW Outreach Specialists.

MSFW Outreach Specialists also work with the local business services team to share their weekly outreach plan to assist in collaboration and share business services information with employers.

C. INCREASING OUTREACH STAFF TRAINING AND AWARENESS

Describe the State agency's proposed strategy for Increasing outreach staff training and awareness across core programs including the Unemployment Insurance (UI) Program and the training on identification of UI eligibility issue

MSFW Outreach Specialists are part of the local Job Service team and receive the UI training required by UI to be able to provide staff-assisted UI information and assistance. MSFW Outreach Specialists attend Job Service meetings with other Employment and Training Specialists that include information and updates from UI and best practices from other Employment and Training Specialists providing UI assistance in Job Service.

D. PROVIDING OUTREACH STAFF PROFESSIONAL DEVELOPMENT ACTIVITIES

Describe the State agency's proposed strategy for providing outreach staff professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

MSFW Outreach Specialists attend Job Service meetings with other Employment and Training Specialists that include information on employment services, business services, one-stop partners, WIOA, and the other services provided in Job Service to job seekers and employers.

E. COORDINATING OUTREACH STRATEGIES

Describe the State agency's proposed strategy for coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

The department has great partnerships with agencies that service MSFWs. MSFW Outreach Specialists share their outreach plans with the NFJP, Migrant Education program, UMOS, and other partners upon request to assist in coordinating visits.

The pre- and post- season meetings assist in building partnerships and determining the most effective ways to coordinate. MSFW Outreach Specialists work directly with other partner agencies and service providers to coordinate outreach efforts.

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM.

Describe the State agency's proposed strategies for:
A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:
i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers; and
ii. How the State serves agricultural employers and how it intends to improve such services.
B. Marketing the Complaint System to farmworkers and other farmworker advocacy groups.
C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

The department's Bureau of Job Service provides the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. In the last two and a half years, the service delivery model has updated to provide both in-person and virtual services. This change has been intentional and is intended to reach people where they're at. It is the goal of Job Service to reach more people in more places with an outreach plan that connects with customers not only in the job centers but in more locations, including libraries, farmer's markets and other community gathering places. The department believes the outreach plan and updates in the service delivery model will make it easier for farmworkers and other customers to receive services.

Migrant and seasonal farmworker status is determined for job seekers who come into the resource room so job service can assess the needs of the job seeker and assist in providing employment services, referrals to the NFJP and WIOA Title I or other WIOA or supportive services.

B.

Every resource room has a complaint system poster that includes information on filing a complaint in English and in Spanish. Job Service staff are trained on taking complaints and offer the option if a jobseeker reveals a concern that may be a violation of an employment law or employment services.

The State Monitor Advocate in their partnership with the National Farmworker Jobs Program grantee facilitates an annual training with the NFJP and other programs that support MSFWs to market the Employment Services Complaint system.

C

One goal for the Program and Planning Section is to increase local Job Service team member's awareness of MSFWs in their area, agricultural employers in the area, the ARS, and the H-2A and H-2B visa programs by creating a training specifically for local staff. An additional goal is to train all Business Services staff on the ARS and how employers can access the H-2A and H-2B visa programs.

6. OTHER REQUIREMENTS.

- A. COLLABORATION

Describe any collaborative agreements the State Workforce Agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and establish new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

The department's State Monitor Advocate has a Memoranda of Understanding (MOU) with the NFJP, UMOS. The goal for this AOP is to increase data sharing and train the NFJP on using the department's case management system so the NFJP can track participants in the same system the state uses.

The department has another MOU with UMOS regarding sharing data and conducting joint outreach with their anti-labor trafficking team. The anti-labor trafficking team at UMOS is working to provide information to MSFWs about labor trafficking, services to victims, and identifying potential cases of labor trafficking specifically in agriculture. The MSFW Outreach Specialists coordinate with this team and also make referrals to the team when there is a concern.

The department's Governor's Council on Migrant Labor creates a formal process for the department to collaborate with MSFW service providers and employers. The department plans to continue to utilize the council to collaborate and build partnerships.

- B. REVIEW AND PUBLIC COMMENT

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed

AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

- i. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.*

The department solicited feedback from employers of migrant workers, agricultural employer organizations, MSFW groups, the NFJP, and public agencies during the development of the Agricultural Outreach Plan (AOP) as part of the process for drafting the WIOA Combined State Plan and did not receive any feedback or suggestions. The organizations/employers contacted include:

- NFJP (UMOS)
- UMOS (Migrant Head Start, Anti-Human Trafficking Team, UI Navigator Grantee)
- Family Health LaClinica
- Legal Action of Wisconsin
- Flyte Family Farms
- Seneca Foods
- Nortera Foods
- Lakeside Foods
- WI Department of Agriculture, Trade and Consumer Protection
- WI Department of Public Instruction, Migrant Education Program
- Madison College HEP Grant Program

Additionally, these entities were notified and provided the opportunity to comment on the proposed plan during the public comment period. Comments on the AOP were submitted by two organizations. The department has reviewed the comments and taken them into consideration for the final AOP. Copies of the comment letters received and the department's response to each are at the end of this section.

LEGAL ACTION OF WISCONSIN

Providing free legal services to low-income Wisconsin clients since 1968 • Proporcionando servicios legales gratuitos a clientes de bajos ingresos en Wisconsin desde 1968

February 16, 2024

WI Dept. of Workforce Development (DWD)
201 E Washington Ave
Madison, WI 53702

Submitted via email to WIOAComms@dwd.wisconsin.gov

Dear Wisconsin Department of Workforce Development:

On behalf of Legal Action of Wisconsin's Farmworker Project, we offer these comments about Wisconsin's Program Year 2024-2027 Workforce Innovation and Opportunity Act ("WIOA") Combined State Plan and its impact on our clients. In making these comments, we are focused on the Wagner-Peyser Act Program section, particularly the Employment Services and Agricultural Outreach Plan. 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. 180-186

MSFWs continue to have less meaningful access to the Unemployment Insurance ("UI") and Job Service systems.

The DWD UI Division's sustained promotion of online systems to process UI claims and register for work continues to create barriers for Wisconsin's MSFWs to access the UI and Job Service systems. Many members of Wisconsin's migrant and seasonal workforce are not computer literate and have limited English proficiency, but the WIOA Combined State Plan fails to deeply address these limitations.

Pursuant to Wisconsin Statute DWD 127.02(7), claimants who participate in an approved job training program are eligible for a waiver of the work search requirement. Although the work search waiver option is a meaningful way for claimants to connect with professional development opportunities while fulfilling the work search requirement, there is little to no information available to claimants during the initial claim application process about the existence of said waiver. Additionally, it is the experience of Legal Action's clients that little information is available to help claimants understand what the Department considers an approved job training program or how to go about requesting the waiver once a claimant is enrolled in an approved program.

Furthermore, from conversations with the DWD's UI Division, Legal Action understands that DWD UI Claimant Specialist staff have been dissuaded from facilitating direct referrals to WIOA employment and training services offered by Job Centers because of the lack of resources and staff needed to be able to take on such referrals. Further integration of WIOA job training programs and other job training programs that allow for a work search waiver is needed on the front end of the claim filing process to effectively assist claimants.

Legal Action also identifies a conflict of interest inherent in the internal goals of WIOA, especially as those goals are expressed in Title II (Adult Basic Education (ABE) and English language services such as Adult Education and Family Literacy Act services (AEFLA)), which is administered by the Wisconsin Technical College System (WTCS), and Title III (Wagner-Peyser Employment Services Program), which is administered by the Department of Workforce Development (DWD). WTCS's mission is to create improvements in Wisconsin's workforce through vocational education.

The WIOA Combined State Plan repeatedly emphasizes the importance of education in the context of improving Wisconsin's workforce. The administering agency for Title II of WIOA is WTCS, which has as its mission to create improvements in Wisconsin's workforce through vocational education. By contrast, the administering agency for Title III of WIOA is DWD, under which its UI program promotes the re-employment of unemployed workers as soon as possible, thereby reducing the number of weeks of unemployment benefits received by the workers. See pages 75 and 118 of the WIOA Combined State Plan. These goals seem mutually exclusive, which could lead to a lack of promotion of educational opportunities to satisfy the work search requirement.

Wagner-Peyser Program, Agricultural Outreach Plan ("AOP"), pgs. 186-200

Farmworker population changes 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.

While past WIOA Combined State Plans lacked analysis of the H-2A program and its impact on the MSFW population in Wisconsin, Legal Action appreciates DWD including more information on the H-2A program in this AOP.

There continues to be significant growth of the H-2A program in Wisconsin. However, although the AOP suggests that there is a decrease in domestic workers seeking agricultural jobs in Wisconsin, particularly in food processing, there are still significant numbers of domestic MSFW who travel and work in Wisconsin agriculture. According to DWD's 2023 Migrant and H-2A Population Report there were around 3,134 non-H-2A migrant workers in Wisconsin in 2023. Furthermore, in recent meetings of MSFW advocates and employers, representatives of Wisconsin food processors indicated high levels of returning MSFW employees during the 2023 season. MSFW serving organizations have also reported at Wisconsin Farmworker Coalition meetings on the increase of MSFW individuals coming from Central American countries like Honduras, Nicaragua, and El Salvador.

To best serve the MSFW population in Wisconsin, it is important to understand the nuanced experiences and needs of both domestic MSFW and H-2A worker populations. The AOP does not indicate whether NFJP's

needs assessment survey included both MSFW and H-2A worker participants. While the AOP seems to suggest that H-2A workers may have less need in areas of food insecurity and housing than domestic MSFW, it is critical to uplift the unique vulnerabilities faced by workers under the H-2A program. Given H-2A workers' reliance upon employers or labor contractors to access food, housing, and medical care, limited access compounded by H-2A workers' lack of personal transportation, community connections, and frequent housing in hotels/motels with limited cooking facilities, H-2A workers likely have deeper or more complex needs than indicated in the AOP.

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.

As indicated in the AOP, the usage of the H-2A program continues to increase in Wisconsin. The DWD reported 2,813 H-2A positions approved by USDOL in Wisconsin in 2023, a 29% increase since 2020. The Adverse Effect Wage Rate ("AEWR") for Wisconsin has also continued to increase. For 2024, workers with H-2A visas and those in corresponding employment should be paid \$18.50 per hour. The Wisconsin state minimum wage remains \$7.25 per hour.

The regulations set forth in 20 CFR subpart B § 653.102 require 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..." These requirements apply to both MSFW and non-MSFW job seekers. 20 CFR, Subpart F, § 653.500. Few of Wisconsin's domestic MSFWs or other domestic workers are aware of their right to apply for jobs listed in H-2A clearance orders. Given that the 2024 AEWR is *2.5 times higher* than the Wisconsin minimum wage, these jobs are valuable economic stabilizing opportunities, and it is important that domestic workers learn about them. Workers will continue to 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.

MSFW focused staff are critical to ensuring that farmworkers receive the services they are entitled to, and their rights are respected.

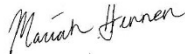
The AOP states that Wisconsin has not been consistently meeting its goal of providing MSFW quantitatively proportionate services as compared to non-MSFWs over the last four years. The underserving of MSFW is troubling.

While the total number of farmworkers in Wisconsin is increasing, according to the WIOA Combined State Plan there are just two MSFW Outreach Specialists covering the entire state of Wisconsin. Historically, DWD Migrant Inspectors also performed MSFW Outreach Specialist work. Legal Action is encouraged that the AOP seems to suggest that DWD Migrant Inspectors may not now be required to perform Specialist duties, in addition to overseeing and enforcing state labor protections related to MSFWs. DWD Migrant Inspector work is critical and requires committed time to complete properly, work that is disadvantaged by also doing Job Service outreach. MSFW Outreach Specialists and DWD staff that enforce Wisconsin's migrant labor law and coordinate foreign labor certification all serve important, but different, roles. Legal Action is glad that DWD is planning to hire more MSFW serving staff.

MSFW Outreach Specialists have the important job of reaching MSFWs at times, locations, and by methods preferred by workers. Given the barriers MSFW face in accessing Job Outreach services, such as lack of personal transportation, work hours that conflict with DWD business hours, no paid time off work, and often limited computer or tech literacy, the traditional One-Stop delivery system is often not an efficient option for MSFWs. While virtual services may provide expanded access, an in-person outreach model remains critical to provide access to MSFW. MSFWs may be unable to come into a Job Center resource room or connect with Job Service staff at libraries or farmer's markets, for example. The AOP could better outline MSFW specific outreach activities, such as visiting with workers at their employer-provided housing during non-work hours, that provide more functional ways of providing services to MSFW.

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 2024-2027 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

/s/
Brenda Lewison
Legal Action of Wisconsin
Attorney

/s/
Ashley Semington
Legal Action of Wisconsin
Farmworker Project Paralegal

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



Tony Evers, Governor
Amy Pechacek, Secretary

March 1, 2024

Mariah Hennen
Brenda Lewison
Ashley Semington
Legal Action of Wisconsin
633 W. Wisconsin Ave., Suite 2000
Milwaukee, WI 53203

Dear Ms. Hennen, Ms. Lewison, and Ms. Semington:

Thank you for providing your comments on the Wisconsin Program Year 2024-2027 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 for reference.

Comment:

MSFWs continue to have less meaningful access to the Unemployment Insurance ("UI") and Job Service systems.

Response:

DWD strives to provide equitable, inclusive access to all of its services. This includes providing meaningful access to individuals with limited English proficiency (LEP).

As you note, many of Wisconsin's seasonal workers are limited in their English proficiency and prefer Spanish. They 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 6:15 a.m. and 5:30 p.m. and on Saturdays between 7:00 a.m. and 1:30 p.m.

Help! ¡Ayuda! Pab!

Our [Frequently Asked Questions \(FAQ\)](#) might have your answer.

Help!	¡Ayuda!	Pab!																		
<p>For help using online services, or for questions not answered online, call (414) 435-7069 or toll-free (844) 910-3661.</p> <p>Help Center Business Hours:</p> <table><tr><td>Wednesday - Friday</td><td>6:15 AM – 5:30 PM</td></tr><tr><td>Saturday</td><td>7:00 AM – 1:30 PM</td></tr><tr><td>Monday - Tuesday*</td><td>6:15 AM – 5:30 PM</td></tr></table> <p>* Mondays and Tuesdays are our busiest days. To reduce your wait time, call on other days of the week.</p>	Wednesday - Friday	6:15 AM – 5:30 PM	Saturday	7:00 AM – 1:30 PM	Monday - Tuesday*	6:15 AM – 5:30 PM	<p>Si necesita ayuda con los servicios en línea o para respuestas a preguntas, las cuales no encontró en línea, llame al (414) 435-7069 o al número gratis (844) 910-3661.</p> <p>Horas de Oficina del Centro de Ayuda:</p> <table><tr><td>miércoles - viernes</td><td>6:15 AM – 5:30 PM</td></tr><tr><td>sábado</td><td>7:00 AM – 1:30 PM</td></tr><tr><td>lunes - martes *</td><td>6:15 AM – 5:30 PM</td></tr></table> <p>* Los lunes y martes son nuestros días más ocupados. Para reducir su tiempo de espera, llame otros días de la semana.</p>	miércoles - viernes	6:15 AM – 5:30 PM	sábado	7:00 AM – 1:30 PM	lunes - martes *	6:15 AM – 5:30 PM	<p>Mus nrhiav kev pab siv cov kev pab online no, losyog koj mus tsis tauonline tiag. hu (414) 435-7069 lossis hu dawb ntawm (844) 910-3661.</p> <p>Chaw Pab Lub Sijhawm ua Haujlwm:</p> <table><tr><td>Wednesday - Friday</td><td>6:15 AM – 5:30 PM</td></tr><tr><td>Saturday</td><td>7:00 AM – 1:30 PM</td></tr><tr><td>Monday - Tuesday*</td><td>6:15 AM – 5:30 PM</td></tr></table> <p>* Hnub Monday thiab hnub Tuesday yog peb ob hnub uas tibneeg hu tauj coob tshaj. Kom txo koj lub sijhawm tos, hu rau lwm lub hnub ntawm lub limtiam.</p>	Wednesday - Friday	6:15 AM – 5:30 PM	Saturday	7:00 AM – 1:30 PM	Monday - Tuesday*	6:15 AM – 5:30 PM
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Getting Help in Wisconsin

- [211 and Other Local Resources for Assistance \(e.g., housing, food, utilities\)](#)

Other Languages

- [Español](#)
- [Hmong](#)
- [Ask Questions or Apply for Unemployment Benefits](#)
- [Interpreter and Translation Services](#)

Additionally, UI and Job Service programs provide Babel notices in all communications of vital information, including hard copy letters or decisions and communications posted on DWD's websites. For more information about how DWD ensures meaningful access to LEP individuals, please refer to the Unemployment Insurance Limited English Proficiency Plan as part of DWD's 2024-25 Nondiscrimination Plan available here: <https://dwd.wisconsin.gov/wioa/pdf/2024-2025-nondiscrimination-plan.pdf>.

The Wagner-Peyser Program (Employment Services/WIOA Title III) is a critical part of the work needed to support workers in Wisconsin, including migrant and seasonal farmworkers (MSFWs). Examples of specific actions taken by DWD to support workers include:

- An increase in the number of bilingual staff providing employment services both in-person and virtually,
- Continued enhancements to the agency's virtual capacity to include working with customers who speak various languages, and
- Collaboration among workforce partners on programs including UI, Title I, and Title II to make appropriate referrals.

You also referenced your perception of a conflict of interest inherent in the internal goals of WIOA, especially between those of WIOA Title II and Title III. WIOA is federal legislation that encompasses a wide range of workforce development programs and the respective goals for each Title program are defined by the United States Department of Labor (USDOL) or Department of Education (DoED). The Wisconsin Technical College System (WTCS) and DWD are the administering agencies for these programs in Wisconsin and do not set the goals at the federal level.

Comment:

Farmworker population changes 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 populations are evolving over time. Based on Legal Action of Wisconsin's comments regarding additional assessments of the needs of H-2A workers, DWD updated this portion of the plan. All available data from the Needs Assessment survey regarding MSFW and H-2A worker participants was provided in the AOP.

Comment:

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.

Response:

DWD promotes job orders processed through the clearance order system via the One-Stop delivery system; this includes promoting opportunities to MSFWs who are interested in finding agricultural jobs. The MSFW outreach specialists are notified of the clearance orders through the One-Stop delivery system.

As stated in the AOP, MSFW outreach specialists promote the services available at the job centers to MSFWs and provide those services on-site if needed. During outreach visits, MSFW outreach specialists promote the entire workforce system. If a MSFW is interested in finding a new job, the specialists assist the worker in finding a job or connecting with a training program that meets the worker's employment goals.

Comment:

MSFW-focused staff are critical to ensuring that farmworkers receive the services they are entitled to, and their rights are respected.

Response:

DWD agrees with your assertion about the importance of the work of DWD migrant labor inspectors and MSFW outreach specialists. You suggest that the AOP could better outline MSFW specific outreach activities. DWD provides information in the AOP that MSFW outreach specialists will travel to visit MSFWs where they live, work, and gather to conduct outreach activities. The specifics of the locations and times cannot be included in the plan as they change frequently. The plan explains that the MSFW outreach specialists and managers will coordinate weekly to organize, communicate, and work together to serve MSFWs.

Thank you again for your thoughtful feedback on the Wisconsin PY2024-2027 WIOA Combined State Plan.

Sincerely,



Amy Pechacek
Secretary
Wisconsin Department of Workforce Development

UNITED MIGRANT OPPORTUNITY SERVICES
COMMENTS
2024 WIOA COMBINED STATE PLAN
Submitted Feb. 16, 2024

Background

The State of Wisconsin has a long history and tradition of promoting the rights and protections of workers. Similar to other states, the living and working conditions of migrant and seasonal farmworkers (MSFWs) are not equal with those of the general population. However, Wisconsin has implemented laws and regulations which exceed those promulgated in other states.

An example of this aggressive approach has been a decade's long establishment and maintenance of the Governor's Council on Migrant Labor. This Council is comprised of four members of the State Legislature, two members of the State Senate and two members of the State Assembly. These four positions are divided equally between Republicans and Democrats. The remaining members of the Council consist of an equal number of migrant advocates and representatives of the agricultural community which hires MSFWs. The duties of the Council are set for in Wisconsin Statutes Section 103.90 – 103.97.

Wisconsin has also promulgated specific legislation requiring worker-employer contracts, housing standards and certain minimum wage guarantees (WI Stat. Chapter 103 - Employment Regulations).

Introduction

The purpose of these comments is to set forth specific areas where United Migrant Opportunity Services (UMOS) believes that the WIOA Combined State Plan can be improved. The State of Wisconsin Department of Workforce Development (DWD) recognizes that it has not consistently been meeting its goals by providing MSFWs quantitatively proportionate services as compared to non-MSFWs over the past 4 years (p. 198). The State Plan sets forth the argument that the goals were not accomplished because staff have not been documenting their activities in a consistent and appropriate manner. This may have some merit, although it is clearly not the only area which has caused problems. DWD states it will review staff practices and research what impact this has had on equity indicators. DWD further states that it is striving to improve its activities to include more robust outreach.

Without robust and effective identification of participants though effective outreach, services can not be provided. This is clearly evidenced by the problems encountered by MSFWs in obtaining equitable services under the Unemployment Insurance Program.

Comments

A. General

It is the position of UMOS that the primary solution to addressing the deficiencies in the performance of DWD is to increase the quantity and quality of communications with MSFWs. The WIOA Plan

states that the DWD will make a robust effort to conduct outreach and provide services in an equitable manner. This is predicated upon a combination of the traditional outreach strategies which require a significant financial investment in staffing, office locations and support systems. UMOS believes that 2 full-time staff members are not sufficient to conduct the wide-range of activities set forth in the Plan.

The other approach is to integrate, to a substantial degree, the use of information technology (IT). The traditional method will require an additional investment in funds and staffing. DWD states that it is planning to add additional positions; however no details are provided. The IT method is a model suited for future use, but it is clearly woefully inappropriate for current circumstances. The circumstances surrounding the Covid pandemic created an awareness among MSFWs that IT can be, in some cases, an effective tool for communication. Nonetheless, a high level of usage of IT is predicated on user competency and possession of technical devices that many MSFWs do not possess. DWD must be prudent in the current use of IT in that it marginally assist in in-person communication, but should not replace or supplant the traditional outreach method.

It must be noted that the model presented by DWD can serve a stable population that has access to adequate resources which, unfortunately, MSFWs do not possess at this time. The Plan provides an assurance in "Subsection 4 - Outreach Activities" that DWD plans to conduct robust outreach to all MSFWs. It is critical to acknowledge that services described in the Plan can only be provided with in-person communication; which is far from being sufficiently available.

B. Unemployment Insurance

There are several areas of the WIOA Plan that address the Unemployment Insurance Program, its implementation, staff training, means of client communications and eligibility. Problems encountered by MSFWs have been identified by DWD and migrant farmworker advocates on a consistent basis for a considerable period of time. These problems were highlighted and intensified by the Covid pandemic.

As with traditional outreach and service components described in Wagner-Peyser and other areas of the Plan, the utilization of IT for communication, outreach and services create numerous barriers and obstacles for MSFWs. These obstacles and barriers include but are not limited to:

- Many MSFWs do not own, nor have access to IT devices;
- MSFWs frequently live in areas where internet coverage is sparse;
- Many MSFWs do not have the knowledge nor experience to utilize IT;
- Most IT used in Wisconsin is English-only;
- As illustrated during the Covid pandemic, IT equipment, when available, is shared by MSFWs and does not allow for privacy.

Effective communication has and continues to be an obstacle in providing unemployment insurance coverage to eligible MSFWs. Along with DWD, the Wisconsin Migrant Labor Council has taken an active role in advocating for changes in the unemployment insurance laws and related regulations. Some specific areas that have adversely affected MSFWs are, but not limited to:

- The 14 day rule;
- Job search requirements;
- Participant self-assessment requirements.

C. Other Services

The WIOA Plan states that the services listed below are accessible to all individuals. The Plan states:

Through the statewide network of 15 Comprehensive and 19 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 DOC facilities.*
- *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.*

As previously stated, services can only be provided to individuals who have been identified through outreach activities. However, another challenge is that services require intense and sometimes sustained interactions between DWD staff and the participant. Note that the majority of services mentioned in this section have been designed for the general public and to be delivered in-person. Due to barriers such as working long hours, English language and IT inefficiency, transportation concerns, etc., MSFWs face numerous barriers to receiving in-person service at the 15 comprehensive and 19 affiliated job centers. The Plan should include how traditional outreach can be conducted to include the delivery of some of these services.

D. Dane County Job Center

Section 4, 1.1, of the Plan states:

The significant one-stop center, the Dane County Job Center, has employment and training specialists trained in the specific needs of MSFW working at the one-stop including bilingual staff. Rigorous outreach is conducted in the workforce development area that the one-stop services to ensure MSFWs are leaving of the services offered at the one-stop.

Clearly, the Dane County Job Center is staffed with employment and training specialists and has bi-lingual capacity, and thus has the ability to serve MSFWs who are able to visit the center. However

UMOS strongly questions the geographic location of the primary center as Dane County is not situated in an area of high MSFW concentration.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'JB', written over a horizontal line.

John Bauknecht
Special Assistant to the President Emeritus
United Migrant Opportunity Services/UMOS Inc.

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



Tony Evers, Governor
Amy Pechacek, Secretary

March 1, 2024

John Bauknecht
United Migrant Opportunity Services/UMOS Inc.
2701 South Chase Ave.,
Milwaukee, WI 53207

Dear Mr. Bauknecht:

Thank you for providing your comments on the Wisconsin Program Year 2024-2027 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 for reference.

Introduction

Comment:

The State of Wisconsin Department of Workforce Development (DWD) recognizes that it has not consistently been meeting its goals by providing MSFWs quantitatively proportionate services as compared to non-MSFWs over the past 4 years. DWD states it will review staff practices and research what impact this has had on equity indicators. DWD further states that it is striving to improve its activities to include more robust outreach. **Without robust and effective identification of participants though effective outreach, services cannot be provided.**

Response:

DWD strives to provide equitable, inclusive access to all of its services and continues to improve its data gathering and analytical services to enhance program performance.

As you've noted, effective outreach is critical to the identification of program participants and subsequent data gathering. However, DWD has exceeded the required number of MSFW reached through outreach and follow-up activities in recent program years. The number of outreach contacts Wisconsin conducted annually for WIOA Program Years 2020, 2021, and 2022 has exceeded the minimum requirement of 40 contacts per week for significant states. Wisconsin was not designated as a significant MSFW state during that timeframe, and still exceeded this benchmark.

General

Comment:

It is the position of UMOS that the primary solution to addressing the deficiencies in the performance of DWD is to increase the quantity and quality of communications with MSFWs.

Response:

See response above describing DWD's performance with respect to outreach and contacts for MSFWs.

Additionally, the Wagner-Peyser Program (Employment Services/WIOA Title III) is a critical part of the work needed to support workers in Wisconsin, including migrant and seasonal farmworkers (MSFWs). Examples of specific actions taken by DWD to support workers include:

- An increase in the number of bilingual staff providing employment services both in-person and virtually,
- Continued enhancements to the agency's virtual capacity to include working with customers who speak various languages, and
- Collaboration among workforce partners on programs including UI, Title I, and Title II to make appropriate referrals.

DWD will note your concern that additional staff are needed for outreach duties, as it considers allocating its resources and staff for operational needs.

Unemployment Insurance and Other Services

Comments:

- Effective communication has been and continues to be an obstacle in providing unemployment insurance coverage to eligible MSFWs.
- The Plan should include how traditional outreach can be conducted to include the delivery of some of these services.

Response:

The AOP demonstrates how MSFW outreach specialists will provide meaningful unemployment insurance (UI) assistance to MSFWs.

The service of providing UI assistance to MSFWs is consistently met and exceeded. MSFW outreach specialists and local job center staff are providing these services to MSFWs and will continue to do so. The services provided at the job centers listed in the Title III section of the WIOA Combined State Plan are provided to MSFWs on-site or at a location of their choosing. MSFWs are not required to go to a job center to receive these services.

DWD strives to provide equitable, inclusive access to all of its services. This includes providing meaningful access to individuals with limited English proficiency (LEP).

Job Service coordinates UI-specific training for statewide Job Service and partner staff who provide services and assistance in job centers. This training ensures that UI programs and services have a presence in job centers throughout the state. Job Service staff receive specific training on UI 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.

Any specific changes to UI laws and related regulations are outside the scope of the WIOA Combined State Plan and will be brought to the attention of the UI division for further consideration.

Dane County Job Center –

Comment:

UMOS strongly questions the geographic location of the primary center as Dane County is not situated in an area of high MSFW concentration.

Response:

The Dane County Job Center was designated as a significant One-Stop Center by the U.S. Department of Labor (USDOL) because of the high number of MSFWs it served in the last program year. The Dane County Job Center is not the only job center in Wisconsin that employs bilingual staff. In the past year, DWD has been intentional about building Job Service bilingual capacity and has increased bilingual staff capacity across the state.

Thank you again for your thoughtful feedback on the Wisconsin PY2024-2027 WIOA Combined State Plan.

Sincerely,



Amy Pechacek
Secretary
Wisconsin Department of Workforce Development

- C. DATA ASSESSMENT

Review the previous four years Wagner-Peyser Act data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals

The state has not consistently been meeting its goals of providing MSFWs quantitatively proportionate services as compared to non-MSFWs over the last four performance years.

The state believes it has not consistently met these goals because staff are performing these services but are not gathering the data elements and validations required to make the MSFW a participant and counted. Training and goals setting for MSFW Outreach Specialists is planned to improve the tracking of services to assist in meeting such goals.

The state also believes that the requirement for all RESEA participants to be co-enrolled in Wagner-Peyser that they are automatically recorded as receiving an Individualized Career Service may impact the proportion and affect these goals. The department plans to review their practices and research what impact RESEA may have on the equity indicators.

The increase in MSFWs who are H-2A visa holders also decreases the number of MSFWs who are eligible for services since H-2A workers are not eligible to receive employment services because of the terms of their visas. The decrease in workers eligible for services makes it more difficult to provide more services. The MSFWs eligible for employment services are mostly MSFWs in food processing facilities. These workers are mainly interested in UI assistance, which is provided and an equity indicator that is consistently met, but they are less interested in other of employment services that assist in meeting the other equity indicators.

- D. ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

A lack of staffing and the impact of COVID-19 lead to the department not conducting as robust of outreach as planned in the previous AOP. The department has hired an additional year-round outreach specialist in January of 2024 has been increasing outreach steadily since the availability of vaccines and PPE to be able to conduct more robust outreach as planned in this AOP.

- E. STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The State Monitor Advocate has reviewed and approved the AOP.

WAGNER-PEYSER ASSURANCES

The Unified or Combined State Plan must include assurances that:	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: <ol style="list-style-type: none"> 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 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; 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 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
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

PROGRAM-SPECIFIC REQUIREMENTS

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

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 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. The previous curriculum had several courses for each level, whereas the new curriculum merges those into one course per level. The new curricula are published in a repository for easy local import and are also made available for viewing through an open access link found at <https://wtcsystem.wids.org>. Professional development on how the English language learning and the WTCS Adult Education standards align will be ongoing and will include an emphasis on designing lessons that support multi-lingual learners in Adult Education and ELL classrooms and increasing instructional rigor.

B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or

Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- *Adult education;*
- *Literacy;*
- *Workplace adult education and literacy activities;*
- *Family literacy activities;*
- *English language acquisition activities;*
- *Integrated English literacy and civics education;*
- *Workforce preparation activities; or*
- *Integrated education and training that—*
 1. *Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and*
 2. *Is for the purpose of educational and career advancement.*

Special Rule. *Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals*

The WTCS awards funds to eligible providers who have demonstrated effectiveness in providing adult education and literacy activities. Local grants will continue to 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;
- Assist immigrants and English language learners to improve reading, writing, math, speaking, and comprehend the English language and acquire understanding of American government, individual freedom, and responsibilities of citizenship; and
- Assist in the attainment of high school equivalency, and transition to post-secondary education and training or employment. Beginning, intermediate and advanced courses include a curriculum

in listening, speaking, reading, and writing using the English language. Courses integrate and contextualize digital literacy and may include elements such as instruction in life skills, civics, workplace literacy, employability skills or career exploration. Student levels are based on proficiency as measured by state approved standardized assessments.

Eligible providers who are awarded funding will follow all required AEFLA curricular and programmatic component expectations, including making sure their workforce/integrated instruction follows the WTCS curriculum standards in English, language arts, mathematics, and English language acquisition. 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. Eligible providers will be required to participate in all required WTCS 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 will include Wisconsin adult education, literacy activities, family literacy activities, English language acquisition activities, Integrated English Literacy and Civics Education, workforce preparation activities, correctional education re-entry activities, and Integrated Education and Training. WIOA Title II funding is approved and overseen by WTCS staff, which includes, the state's Adult Education Director and designated staff for adult education, English language learning, corrections and re-entry, program strategy and improvement, and the WTCS Board.

Activities funded under WIOA Title II will be undertaken by any eligible provider or combination of eligible providers. All Title II applicants will 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.

Open grant competitions will be held every four years. In 2020, the WTCS held an open competition with funded activities starting on July 1, 2021. Open grant competitions for 2026-2029 will be conducted in the same manner and format. The open competition recognizes the broad array of eligible applicants and emphasizes partnerships and career pathway-centered collective efforts whenever possible.

All Title II grant categories will be open in a direct and equitable manner as per WIOA and Department of Education requirements. The funds are made available through a competitive application process. These funding opportunities are posted on the agency website, shared through regional media, and posted on the state's Public Notices informational website.

All grant awards will be made to eligible providers in accordance with 34 CFR 463 subpart C. Any organization that has demonstrated effectiveness in providing adult education and literacy activities is eligible to apply for a grant. To demonstrate effectiveness, applicants will be required to provide performance data on its record of improving the skills of eligible individuals and outcomes related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education or training.

Grants will be competitively awarded on a four-year basis, with updated applications due each year. Each eligible provider seeking a grant will be required to provide a description of how funding will be spent consistent with the requirements of Title II of AEFLA including administrative costs, a description of any cooperative arrangements with other partners, a description of how services are in alignment with the local Workforce Development Board plan, a description of how the applicant will meet performance

targets across the WIOA primary indicators of performance, how the applicant will fulfill the appropriate one-stop partner responsibilities, how the applicant will provide services to meet the needs of learners in the area, and other requirements under 34 CFR 463 subpart C.

The competition review panel will be composed of individuals selected for their experience in the fields of adult and postsecondary education, training, and workforce development. This panel will be trained by the WTCS Grants Management team prior to the review and scoring of applications, which are based on the criteria in the WTCS Application Scoring Rubric. Applications are first reviewed to determine if the applicant meets the definition of an eligible provider of demonstrated effectiveness. If they do not meet this standard, the application will not be scored.

All applications will be evaluated using the same scoring criteria. These criteria will be aligned with the 13 considerations for funding applicants who have demonstrated effectiveness, including:

1. The degree to which the eligible provider would be responsive to regional needs as identified in the local workforce development plan;
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 §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, as well as the activities and services of the one-stop partners;
5. 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;
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 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, 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 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.

Received grant applications are shared with the appropriate local Workforce Development Board to review for consistency with their local plan and are provided an opportunity to make recommendations to promote alignment with the local Workforce Development Board plan.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will use the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- *Adult education and literacy activities;*
- *Special education, as determined by the eligible agency;*
- *Secondary school credit;*
- *Integrated education and training;*
- *Career pathways;*
- *Concurrent enrollment;*
- *Peer tutoring; and*
- *Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.*

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 grant funds will be awarded to eligible providers under Section 225 of the Act that have demonstrated effectiveness in corrections education and in educating other institutionalized individuals. Correctional education grant funds will be made available through the previously mentioned competitive grant application process in accordance with 34 CFR 463 subpart C. The competitive grant announcement will be shared through posting on the WTCS website, media press releases, and through posting on the state's Public Notices site. All eligible providers are provided the same information and all applications are evaluated using the same scoring criteria. Applications are scored by multiple readers utilizing the published guidelines for scoring. Grants are awarded over 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 deliver 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; and
8. Transition to re-entry and post-release services with the goal of reducing recidivism.

The WTCS will require that each eligible provider's grant application describe and define the academic program areas in which they will provide academic preparation and instruction and describe how they will deliver these programs in partnership with correctional institutions.

WTCS incarcerated and re-entry programs will 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 will reduce recidivism by providing a variety of educational and career opportunities to ensure successful re-entry into the community and will be prioritized for individuals who are likely to leave the correctional institution within five years of participation in the program. Beginning in 2019, the WTCS has a dedicated staff member who works with corrections and re-entry education and programming, and who manages all AEFLA correctional education grant awards.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA.

Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

WTCS will fund IELCE services that include instruction in literacy, English language acquisition, instruction on the rights and responsibilities of citizenship and civic participation and workplace preparation and training. These IELCE services prepare English language learners for placement in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency. Eligible participants in this category are adults, including professionals with degrees and credentials in their native countries.

WTCS IELCE programming is aligned with an immigrant integration and inclusion approach. The immigrant integration and inclusion approach promote economic mobility and social inclusion for newcomers and their children. In addition, the approach promotes learner development and growth and provides pathways to postsecondary and workforce systems. WTCS IELCE programming will continue to address the three pillars of immigrant integration and inclusion; civic, linguistic, and economic integration.

WTCS will establish its IELCE programs through a multi-year competition in accordance with Sec 231(c) of WIOA and in accordance with 34 CFR 463 subpart C. WTCS awards eligible providers through a competitive application process, ensuring that all applications are evaluated using the same rubric and scoring criteria which map to the 13 considerations for funding applicants who have demonstrated effectiveness. Previously, WTCS ran an open competition identify providers for the multi-year 2022-2025 grant period. The 2026-2029 multi-year competition will follow the same open competitive process. Applicants will be able to apply for 243 funds in combination with applying for other grant awards or as a standalone application.

WTCS will continue to ensure that all eligible providers have direct and equitable access to apply for multi-year grants by posting guidelines utilizing various regional and statewide media, the agency's website, and posting to 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.

Grant applications will require applicants to demonstrate how their proposed IELCE programs will serve English language learners in accordance with the requirements of section 243 and in accordance with 34 CFR 463 subpart C. Providers must describe how IELCE funds will only be used in combination with Integrated Education and Training as defined in WIOA Section 203(11). Providers must also detail how IELCE pathways provide students with the opportunity to earn certificates and degrees in the workforce or career advancement leading to economic self-sufficiency. In addition, 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 WTCS AEFLA grant guidelines.

An eligible provider who receives funds through the IELCE program will be required to ensure that IETs are connected to programming 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.

Programs may offer instruction in partnership with other entities in order to achieve the requirements of the law. For example: A program, such as a community-based organization (CBO), may deliver contextualized instruction in their literacy program and another program (technical college) may provide the related training activities or workforce preparation activities.

Awarded funds will be used to support the operational expenses of local IELCE programs, including teacher salaries and benefits, other staff such as navigators or transition specialists, classroom supplies, textbooks, and other items necessary to carry out instruction in English language acquisition, workforce preparation activities, and civics education. Funds in the IELCE grant category will be 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;
- Connections to and through integrated education and training;
- Career Pathways' related services and instruction including the ELL/ABE portion of concurrent enrollment in ELL/ABE and occupational training;
- Workforce preparation;
- Numeracy and/or digital literacy; and
- Bridge programming to prepare learners for participation in an IET program.

WTCS IELCE offerings connected to IET will be 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 will 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, each IELCE offering connected to IET is 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. Need assessment data will be collected amongst local IELCE providers through surveys, focus sessions, or discussions with workforce system partners. In addition, each IELCE offering connected to IET 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 support gainful employment for participants.

Providers of IELCE will 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 will 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 will have immediate labor market value upon exit from the program.

Once an IELCE connected to IET is fully implemented and enrolls participants, employer partners will continue to be engaged. Providers of IELCE will coordinate 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 will ensure that IELCE career pathways are responsive to local workforce needs and provide participants with the skills to obtain employment.

Providers of IELCE services will work directly and jointly with their local workforce development system to carry out the activities of the program by 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 will 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 training. IELCE providers will make appropriate referrals to their local one-stop-center for additional services available to participants including occupational skills training supportive of integrated education and training, and assistance with occupational training costs in coordination with other WIOA partners, such as Title I. Participants with other barriers to employment including transportation and childcare will be referred to other WIOA partners for assistance. In addition, the local one-stop-centers and the IELCE providers will coordinate service and instructional hours to best meet the needs of program participants.

Please note that integrated and contextualized English language acquisition activities without workforce preparation and connection to IET and other workplace training must be offered under Section 231 and not through IELCE section 243 funding.

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) Alignment of adult education and literacy activities with other core programs and one-stop partners to implement strategies identified in the State plan.

WTCS will utilize Title II funds to support the alignment of adult education and literacy activities with other core programs and one-stop partners. The coordination of WIOA in Wisconsin relies on active collaborative work amongst representatives of all core and supplemental partners to develop career pathways which provide access to employment and training services for individuals in adult education and literacy activities. As part of this collaboration, there are several cross-title committees that meet, and will continue to meet, to assess statewide needs. These committees will include the WIOA Executive Committee, WIOA Management Committee, WIOA Operations Committee, WIOA Steering Committee, and various working teams including a WIOA Communication Team, Policy and Guiding Principles Team, and Data Steward Team. WTCS Title II will continue to be represented on each of these committees and teams to support alignment of Title II with the other WIOA core programs and one-stop partners. Examples of activities which have supported such alignment 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 statewide professional development such as the Wisconsin WIOA Roundtable Conference.

B) Establish or operate high quality professional development programs to improve adult education instruction.

WTCS will utilize Title II state leadership funds to support high quality professional development programs. Professional development planning and deployment will continue to be led by WTCS Adult Education staff. Professional development programs will be offered in alignment with activities pursuant to section 223. Examples of WTCS professional development activities that will be offered include Student Achievement in Reading (STAR), Teaching the Skills that Matter in Adult Education (TSTM), and the ADVANCE Integrated Education and Training Project's Basic Integrated Education and Training Design Camp and the Advanced Integrated Education and Training Design Camp. In addition, WTCS will continue to identify professional development needs through the review of data, such as the NRS tables, and local provider surveys and feedback. This information will be used to identify local provider challenges and promising practices, which are then addressed and elevated at WTCS professional development opportunities such as the Adult Education Leaders monthly meetings, the bimonthly Integrated Education and Training Community of Practice, annual Adult Education and Re-entry/Justice Involved System Called Meetings, and the WTCS Common Ground Conference.

C) Technical assistance to local providers receiving funds.

WTCS will continue to deliver technical assistance to enhance program effectiveness, assist providers in meeting established performance standards, and understand their role of eligible providers as a one-stop partner. Technical assistance is delivered to all providers and targeted based on individual provider needs. Examples of technical assistance that will be offered includes understanding the WIOA primary indicators of performance and local reporting requirements, federal and state standards in Integrated Education and Training and Integrated English Literacy and Civics Education, distance education

standards, and local alignment with the Wisconsin Assessment Policy. WTCS will also collaborate with WIOA partners to co-deliver technical assistance such as referrals between WIOA Title IV Department of Vocational Rehabilitation or leveraging the WIOA Title I Eligible Training Provider List. Guidance will also continue to be shared with Wisconsin Title II providers on one-stop partnership including establishing MOU's and supporting infrastructure costs.

D) Monitoring and evaluation of the quality of, and improvement in, adult education. Dissemination of information about models and proven, or promising, practices within the State.

WTCS will continue to monitor and evaluate the quality of local Title II providers through a series of approaches. Each funded Title II provider will continue to be required to submit grant progress reports during and at the end of each program year. Providers will detail challenges and successes in operating Title II activities pursuant to their grant awards and provide data to demonstrate their grant outcomes. WTCS Adult Education staff will review the grant reports provided to ensure compliance with WIOA Title II requirements and to identify promising practices within the state.

WTCS will generate a monthly AEFLA Reporting and Performance Accountability Monitoring Report. The report will be distributed to each funded Title II provider and detail progress in achieving grant goals. A series of quantitative indicators will be presented in the report such as the number of participants served, pre-/post-test rate, Measurable Skill Gain rate, grant spend-down rate, and participant counts in Integrated Education and Training and Integrated English Literacy and Civics Education. WTCS Adult Education staff will review the monthly report throughout the year and reach out to local Title II providers who appear to be successfully or unsuccessfully achieving their programs Title II goals. WTCS review of the monthly report will also assist in coordinating targeted technical assistance and support the identification of providers who have potential promising practices which can be shared within the state.

WTCS will continue to coordinate the Wisconsin AEFLA Program Review Process to support its monitoring and evaluation efforts. Program review is an opportunity for WTCS staff and local Title II providers to examine the program's design, effectiveness, performance, and compliance with state and federal guidelines. The process also provides an opportunity for Title II providers to receive technical assistance from the WTCS to strengthen the program.

The AEFLA program review process is coordinated annually by the WTCS and includes virtual and on-site program review with selected Title II providers. Various aspects of the AEFLA program may be reviewed by the WTCS team such as:

- 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; and
- Student accommodations.

Wisconsin AEFLA programs will engage in discussion with WTCS staff in these areas and will 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 Wisconsin AEFLA Program Review Process is a continuous cycle comprised of four core activities that are coordinated on an annual basis by the WTCS. These include:

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

WTCS will use state leadership funds to support a series of permissible leadership activities in a variety of areas. Funds will be used to support the development of content or models for Integrated Education and Training and career pathways, assistance to local providers in meeting the state's adjusted levels of performance, identifying curriculum frameworks and approving local provider adult education and literacy courses in alignment with state standards, aligning adult education and literacy courses to content standards, the development and implementation of a system to assist in the transition from adult education to postsecondary education, including linkages with postsecondary educational institutions or institutions of higher education, and integration of literacy and English language instruction with

occupational skill training, including promoting linkages with employers. (H) Activities to promote workplace adult education and literacy activities.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

WTCS will continue to prioritize and measure program quality on a continuous basis through various mechanisms that include:

- Client Reporting System Data Reporting – The WTCS maintains a student record-keeping system known as Client Reporting. The Client Reporting System allows all funded AEFLA providers to report each of the required data elements necessary to generate the NRS statistical tables. In addition, these student level data are matched with external data systems such as the National Student Clearinghouse to generate the WIOA primary indicators of performance. Data must be reported on at least a quarterly basis. WTCS staff will continue to review data submissions and aggregated data across funded providers on a monthly basis to monitor data reporting and learner outcomes. When data deviates from what is expected or anticipated, WTCS staff will contact funded providers to further understand local policy or practices that might be contributing to the uncovered trends.
- Grant Reports – The WTCS will continue to require that each funded AEFLA provider submit grant reports during the year and at the end of each year. These reports will be reviewed by WTCS adult education staff who serve as grant managers. Grant managers will assess each grant report to identify if local providers are successfully achieving their grant award goals. As local funded providers experience successes or challenges in achieving their grant awards, WTCS staff will intervene to understand technical assistance or professional development needs to promote program quality.
- Monthly AEFLA Data Reporting & Performance Accountability Monitoring Report – The WTCS will continue to generate the AEFLA Data Reporting & Performance Accountability Monitoring Report on a monthly basis. This report will contain each local funded provider’s grant award goals and outcomes data to reveal progress in achieving grant award goals. Examples of data within the report include Measurable Skill Gains rates, pre-/post-test rates, and grant spend down rates. WTCS staff monitor these data throughout the year, email each provider their own report, and coordinate discussion with local providers when data reveals deviations from what is anticipated or expected to promote program quality.
- Wisconsin AEFLA Program Review Process – The WTCS will continue to coordinate the Wisconsin AEFLA Program Review Process to assess adult education provider quality. This multi-step process includes the assignment of a provider “risk score” which ranges from 0 to 100 and is generated from the culmination of a series of weighted student, fiscal, and program operations measures. Local providers with a higher “risk score” are prioritized for virtual or onsite program review. During program review, WTCS staff assess local program policy and practices to ensure

alignment with AEFLA grant awards and WIOA expectation. Provider quality assessment is supported through local staff interviews, data review, document analysis, and other methods. Shortly following program review activities, the WTCS staff generate a summary report identifying commendations and areas of improvement. When necessary, local funded providers will be required to generate continuous improvement plans and engage in required technical assistance to ensure compliance with AEFLA grant award expectations and WIOA requirements.

- **WTCS Action Research** – The WTCS will continue to coordinate the Action Research process to inform education practices and policies through rigorous research. Each year, the WTCS conducts quantitative, qualitative, or mixed methods research to explore various research topics. Each year, the WTCS has prioritized one Action Research project related to the quality of adult education and literacy activities. To date, WTCS has conducted research on mechanisms to enhance Measurable Skill Gains outcomes, equity in Integrated Education and Training participation, and approaches to maximize adult education participation which benefit student self-sufficiency and community advancement. Research findings will continue to be crafted into a brief which are distributed to local funded providers, local WIOA partners, and national adult education and literacy advocates. Action Research brief findings are communicated to local providers to support the enhancement of provider quality.
- **Assessing Quality of Professional Development Programs** – The WTCS will continue to assess offered professional development programs to ensure they meet local program needs. Assessment includes distributing surveys to local providers to first understand their needs. In addition, WIOA expectations related to professional development programs, NRS data, findings drawn from WTCS Action Research, and themes uncovered from the AEFLA Program Review Process will be used to inform professional development needs. Once professional development has been identified and delivered to Title II providers, each professional development program will be assessed through surveys and provider feedback to improve future professional development offerings and quality.
- **Integrated Education and Training Planning Tool** – Providers will be required to submit the IET Planning Tool before they offer the program to students. WTCS Adult Education staff will review the planning tool in collaboration with the relevant occupational Education Director and will provide feedback and technical assistance as necessary. These activities will be coordinated to support Integrated Education and Training program quality and alignment with WIOA and state requirements.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

States must provide written and signed certifications that:

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

The State Plan must include	Include
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 assurances that:

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

PROGRAM-SPECIFIC REQUIREMENTS STATE VOCATIONAL REHABILITATION SERVICES PROGRAM

A. STATE REHABILITATION COUNCIL

All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in Section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has (select A or B):

(A) is an independent State commission.

[X] (B) has established a State Rehabilitation Council.

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

Council Representative	Member	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council	Kyle Kleist	1	September, 2021
Parent Training and Information Center	Lori Karcher	2	July, 2022
Client Assistance Program	Jennifer Espinoza Forlenza	1	May, 2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the State VR Agency)	Gadeen Taylor Duke	2	June, 2023
Community Rehabilitation Program Service Provider	Jennifer Felty	1	July, 2022
Business, Industry, and Labor	Alan Kaltenberg	2	June, 2023
Business, Industry, and Labor	Michael Jackson	1	August, 2022
Business, Industry, and Labor	Richard Straub	2	June, 2023
Business, Industry, and Labor	<i>Vacant</i>	<i>Vacant</i>	
Disability Advocacy Groups	Jaclyn Borchardt	1	May, 2023
Disability Advocacy Groups	Jolene Wanek	1	August, 2022
Disability Advocacy Groups	Kathy Meisner	1	June, 2023

Disability Advocacy Groups	Elizabeth Kennedy	2	July, 2022
Disability Advocacy Groups	Dr. Deborah Lee	1	July, 2022
Disability Advocacy Groups	Lindsey Kreitzman	2	June, 2023
Disability Advocacy Groups	Natalia Graf	1	September, 2021
Current or Former Applicants for, or Recipients of, VR services	Norene Lueck	1	August, 2021
Current or Former Applicants for, or Recipients of, VR services	<i>Vacant</i>	<i>Vacant</i>	
Current or Former Applicants for, or Recipients of, VR services	<i>Vacant</i>	<i>Vacant</i>	
Current or Former Applicants for, or Recipients of, VR services	Alexis Riggs	1	July, 2022
Section 121 Project Directors in the State (as applicable)	Megan Bisonette	2	July, 2022
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	Alicia Reinhard	1	August, 2019
State Workforce Development Board	Ann Franz	1	August, 2022
VR Agency Director (Ex Officio)	Delora Newton	1	May, 2023

If the SRC is not meeting the composition requirements in Section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in Section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

Wisconsin's Rehabilitation Council (WRC) is meeting the composition requirements aside from one open position representing business, industry, and labor. The council is actively recruiting for this position. DVR's Business Services program manager/section chief has reached out to employers that have worked with the DVR program.

In accordance with the requirements in Section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

In October 2022, DVR informed the WRC of the State plan requirements and state timelines. DVR also asked for WRC's recommendations. DVR attended committee meetings when the council was creating their recommendations for the state plan to provide support, responses, and answer questions. DVR received the WRC state plan recommendations in May 2023. WRC reviewed their previous state plan recommendations as well as recommendations from the 2021 CSNA to help inform the recommendations submitted in May 2023. DVR presented our response to the recommendations at the June 2023 Executive Committee and Performance Measures and Quality Assurance Meetings and took additional feedback. DVR presented our state plan draft to the Full WRC council meeting in August 2023.

Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

WRC Recommendation #1: DVR is encouraged to adopt a biennial review of its processes and timelines related to eligibility determination, plan development, and delivery of consumer goods and services.

1A.This review should include feedback from service providers regarding the effectiveness of the services being provided, the ease of providing the services, concerns related to service delivery including payment for the services and any recommendations for improving the consumer experience.

1B.This review should include feedback from consumers regarding the effectiveness of the services being provided, the ease of accessing services, concerns related to the delivery of services, and any recommendations for improving the consumer experience.

DVR is encouraged to obtain council input on the review processes and to share the results of this review with the council for further quality improvement.

DVR Response:

In response to 1A., we continually receive feedback from service providers that helps to inform our decisions. We have and will continue to survey providers every two years to help inform the service agreement review/renewal process as well as collecting input to inform statewide service technical specification changes. In local areas where service provider capacity and concerns have been brought up, DVR has offered local area focus group meetings with providers. These meetings have produced good suggestions and are helping to inform decisions related to provision of services to consumers. We will continue to offer these focus groups as needed. DVR continues to meet with a Service Provider Advisory group twice per year. DVR will also hold two Statewide Service Provider meetings each year with the intent to provide information and solicit feedback.

In response to 1B., DVR has been doing quality assurance case reviews related to DVR processes and consumer experience. We are and will continue to implement rapid engagement strategies and consumer contact standard guidance. DVR's Diversity Equity Inclusion (DEI) Action Plan, our 3-year Comprehensive Statewide Needs Assessment (CSNA) and WDA 2's Milwaukee Equity Action Plan has strategies related to obtaining consumer feedback to help improve the consumer experience. We also feel that DVR staff feedback is important to consider as well.

WRC Recommendation #2:

DVR is encouraged to identify, implement, and conduct connectivity assessments for all consumers that are engaged in the comprehensive assessment process for plan development. In addition, DVR is encouraged to conduct a basic computer and internet assessment for all consumers engaged in work search and post-secondary education. When needed, DVR should purchase the necessary equipment (including adaptive equipment) to ensure that consumers are able to effectively access and function in the digital world. This includes broadband Internet where available and laptops, cell phones and hotspots in cellular service plans. DVR should also provide the necessary training for the consumer to be proficient in using a computer and navigating the internet.

DVR Response:

DVR agrees that technology, such as basic computers and access to the internet, is an important part of a consumer's employment success. DVR is an individualized service program. Requiring this type of assessment for every consumer could slow down the DVR process and a consumer's path to employment. While this type of assessment may be necessary for some consumers, it will not be necessary for others. We will look at technology, access and needs on an individualized basis. DVR has updated its computer purchase guidance and will educate staff on it. There are assessment questions provided in this guidance for staff to use with consumers to help determine technology and connectivity needs. It is hoped that this guidance will get the types of services suggested in this recommendation to the consumers who need it.

This recommendation and response focus mainly on basic computer/technology needs. DVR will continue to focus on technology needs such as specialized/adaptive equipment and software related to disability accommodations.

WRC Recommendation #3:

DVR is encouraged over the lifetime of this state plan to increase the:

3A. Overall hourly wage, hours worked per week and employee benefits by 15%,

3B. Number of credentials attained by consumers by 10% and

3C. Number of consumers pursuing a credential by 10%. This recommendation includes consumers in supported and customized employment. Benefit analysis services should be offered to the consumer to ensure that any increase in wages and hours does not negatively impact the consumer's benefits or affect the overall welfare of the consumer.

DVR Response:

We agree increasing hourly wages, hours worked per week and employee benefits is important. DVR has added a state plan goal to increase consumer wages by 10%-15% over the lifetime of the plan. DVR and WRC agreed to use this range during the WRC Full Council meeting in May 2023. We believe the focus on high quality jobs with an increase in hourly wage will also create an increase in hours worked per week and employee benefits. DVR's Career Pathways Advancement grant also seeks to promote training advancement options for consumers. Additionally, DVR's state plan goals will include strategies to promote education and training services which will lead to increased credentials and high wage jobs. Finally, DVR offers work incentive benefits services and Ticket to Work information to consumers to ensure they have access to information about the impact of earned income on benefits, and the resources to make informed employment decisions.

WRC Recommendation #4:

DVR is encouraged to increase supported and customized employment providers across the State of Wisconsin by 10% over the lifetime of this state plan, with an emphasis on building capacity in underserved regions of the state.

DVR Response:

DVR agrees with this recommendation and has a specific goal related to decreasing the number of providers with waiting lists. A strategy for this goal will be to increase capacity of current providers as well as find new providers.

WRC Recommendation #5:

DVR is encouraged to survey the Business Services Consultants (BSC) to identify training that would enhance their professional knowledge. The council recommends that the BSC's receive at least one yearly training on disability-related employment supports that have been identified as effective in aiding a person with the most significant disabilities to obtain and maintain employment.

DVR Response:

DVR agrees with this recommendation. This will be a strategy under the business service state plan goal.

WRC Recommendation #6:

DVR is encouraged to identify at least four regional resources that would help reinvigorate training in supported and customized employment for service providers across the state.

DVR Response:

We are currently working with Association of People Supporting Employment First (APSE) to provide supported employment training that is Association of Community Rehabilitation Educators (ACRE) certified. We will continue to investigate and encourage training in these areas for providers. Service Provider training will also be a strategy under DVR's goal of increasing service provider capacity.

WRC Recommendation #7:

DVR is encouraged to work with the WRC-Policy Review and Administration Committee to review the processes DVR uses to establish service rates and fees using the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM) rate-setting methodology guide as a tool.

DVR Response:

DVR has been increasing service provider rates over the last several years based on feedback from providers, DVR staff, and consumers. DVR will explore the Rate-Setting Guide from VRTAC-QM and will also be looking into options to contract with an outside resource to assist with setting rates. Review of rates will be a strategy within the state's goal of reducing service provider wait lists. DVR can provide information to the council related to changes in service rates and fees as we have been doing.

WRC Recommendation #8:

DVR is encouraged to identify and implement at least two formal transportation service options that offer timely, reliable, accessible, and affordable transportation services in rural, urban, and tribal areas.

Priority should be given to "transportation deserts" or areas with a limited number of transportation providers.

DVR Response:

DVR is not in the position to assess or create transportation service options. This is a Wisconsin transportation system issue. We will continue to have DVR representation on the Non-Driver Department of Transportation committee. We are open to being a part of other committees or workgroups to address this systemic issue. DVR staff in our local areas help consumers investigate available transportation options to support the IPE. We have assisted consumers with mileage reimbursement, use of public transportation, use of private options like taxi services, Uber and Lyft, and assistance in learning how to use transportation options. Additionally, at the Wisconsin Rehabilitation Council's request, DVR investigated and modified language in our Service Provider agreement to allow for limited transportation of a consumer by a DVR Service Provider who has met defined insurance requirements when the provider is providing a service under the agreement to that same consumer.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA)

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

(1) The VR services needs of individuals with disabilities residing within the State, including:

(A) Individuals with the most significant disabilities and their need for Supported Employment;

The following themes emerged in the most recent CSNA completed in 2021 around the needs of individuals with the most significant disabilities including their need for supported employment.

- Transportation, job skills and training were all identified as the most important rehabilitation needs for individuals with disabilities. Transportation was by far the most frequently mentioned need, especially in the rural areas;
- Mental health impairments were frequently cited as a barrier to employment for DVR consumers.
- The need to develop social skills and to dispel employer's misconceptions about the ability of individuals with disabilities to work were frequently cited as needs;
- Individuals with the most significant disabilities are often fearful of losing SSA benefits, and this continues to affect the jobs they pursue and the hours they strive to work;
- There is a waitlist in many areas for extended services in supported employment and difficulty getting job coaches due to provider turnover during the pandemic;
- Financial literacy was identified as a service need for DVR consumers and the inability to manage money, plan for the future, save and invest was cited as a reason that DVR consumers may lose jobs and return to DVR for services again;
- Affordable housing was identified as an emerging need for individuals with disabilities; and

- There is continued need for the development of supported and customized employment among providers to be able to help these individuals transition to competitive integrated employment from sheltered workshops.

(B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;

The 2021 CSNA identified the following recurring themes related to the needs of individuals with disabilities who are from minority racial or ethnic groups:

- Community and systemic racism were identified as a primary barrier to employment for minorities with disabilities.
- Other rehabilitation needs for individuals with disabilities from diverse cultures are similar to all individuals with disabilities in Wisconsin.
- Most of the individuals that participated in this CSNA did not believe that DVR underserved any specific population of individuals based on race, disability type or geography. However, those that did identify potentially underserved groups cited individuals with disabilities living in rural areas, Hispanics and Asians.

The August 2020 report titled, Understanding the Influences of Race, Disability, and Poverty on Employment: Perspectives from Wisconsin Division of Vocational Rehabilitation (DVR) Participants Living in the Central City of Milwaukee produced by VRTAC-TC and WINTAC funded through RSA identified six primary themes as well as near-term and long-term recommendations. This report resulted from input from 30 residents of Milwaukee's Central City who were engaged with DVR and either pursuing employment and career opportunities or recently having exited the program. Milwaukee area DVR staff with support of DVR Senior Leadership and Central office staff are currently working on implementing these recommendations.

Primary themes shared by participants included:

- The Importance of Effective Counselor Communication, Responsiveness, and Working Alliance
- Concerns About Staff Turnover, Delays, and Lack of Time and Flexibility
- The Influence of Race
- Challenges Presented by Poverty
- Participant Perspective on Improving DVR Services

In 2022 DVR engaged in a Diversity Equity and Inclusion Needs Assessment Study with Roadmap Research Global. In addition to the 2021 CSNA and the 2020 Understanding the Influences of Race, Disability, and Poverty on Employment: Perspectives from Wisconsin Division of Vocational Rehabilitation (DVR) Participants Living in the Central City of Milwaukee, this study examined DVR's DEI-related data, policies, internal and external communications, and training strategy to critically analyze DVR's current DEI practices and to understand DVR's culture. Furthermore, the DVR DEI Needs Assessment Study involved leadership and front-line interviews of 30 individuals across the agency to

gather employee thoughts and perspectives on DVR's culture, the current state and priority of DEI, and ideas for improving DEI at DVR in the coming years. The assessment identified key findings and both short and long-term recommendations. This assessment helped to inform DVR's 2023 DEI Action Plan.

2022 DEI Needs Assessment Key Findings:

- The Culture of DVR is generally defined as caring, compassionate, and one that thrives on collaboration and teamwork.
- There is a significant amount of support for DEI initiatives across all datasets (ERG Survey, DWD Employee Engagement Survey, and DEI Needs Assessment Interviews)
- The data unanimously confirm the need for greater DEI focus at the state level and for all WDAs, indicating a significant underrepresentation of focus on the Hispanic/Latino population, disproportionately low case success rates for people of color, and a lack of acknowledgement of Intersectional diversity in general.
- Consumers and Employees are ready for DVR to move beyond DEI messaging and demonstrate DEI action and understanding.
- Local WDAs need local-level DEI planning and ownership within a unified state framework.
- Internally and Externally, DVR has room for improvement when it comes to communication with and outreach to consumers, DVR leadership communication with staff, and DVR communication skills related to receiving tough feedback and having critical conversations.
- There is a fear of reporting problems and experiencing retaliation in the agency and no clear means for employees to report problems in an actionable way.
- DVR's workforce (particularly management) could be more diverse, representative of the consumers it serves; developing stronger talent pipelines and developing current employees could offer solutions.
- DVR's ERG is a great first step for engaging people of color at DVR, but the ERG's purpose is not clearly defined. In general, DVR could be asking people of color for too much emotional labor without compensation or personal professional/career benefit.
- There is a strong desire for and need for more in-depth training and shifting away from "one and done" trainings
- When it comes to internal and external policies, there is a consensus that current policies are not necessarily inequitable but are often too complex, too slow, require too many "hoops," are too rigid, and are poorly communicated.

- (C) Individuals with disabilities served through other components of the workforce development system; and

The 2021 CSNA identified the following needs of individuals with disabilities served through the workforce development system:

- The interview participants indicated that it is common for DVR to have their consumers register with the Job Centers of Wisconsin and this is borne out by the data on the number of DVR participants that access employment services (Title III) through the Centers. The relationship between DVR and the job centers was described as good, but the pandemic resulted in the Centers operating exclusively online, so access has been limited. The relationship remains primarily one of referral between DVR and the Centers;
 - The referral stream from the job centers to DVR was steady prior to the pandemic but has decreased significantly since the office closures from March 2020 to June 2021. DVR is hopeful that this referral source will pick back up in the future;
 - Prior to the pandemic, the job centers struggled to provide effective services to individuals who are blind, deaf, or have significant mental health impairments. These individuals were routinely referred to DVR without accessing the in-person services at the centers; and
 - The partnership with Adult Education and Family Literacy was noted as an area where DVR and WTCS could increase collaboration and share resources for training for DVR consumers.
- (D) Youth with disabilities, including students with disabilities and their need for pre-employment transition services. 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 IDEA

The 2021 CSNA identified the following needs of youth with disabilities and their need for pre-employment transition services:

- The pandemic and resulting school closures had a significant impact on transition at all levels, especially on providers of pre-employment transition services. However, providers were able to shift to remote service provision and DVR was very supportive of the process;
- The rehabilitation needs of youth and students with disabilities in Wisconsin are similar to all individuals served by DVR except that the need for social skills and self-advocacy skills were cited more frequently and with a greater level of importance than adults;
- All five of the pre-employment transition services were identified as important needs for students with disabilities, with work-based learning cited as the most important service that can help prepare youth and students for employment upon transition;
- Interview participants stressed how important independent living skills development is for youth if they are to be successful in the world of work and achieve their highest potential;
- The Project Search sites were praised by several interview participants as being helpful for transition-age youth and an important source of job training and soft and hard skill development; and
- Section 511 requirements for youth and the career counseling and information and referral have impacted and disrupted the pipeline from secondary school to sheltered workshops. The interview participants stressed that service providers need the capacity to serve this

population through supported or customized employment to promote competitive integrated employment for youth with disabilities.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State.

The 2021 CSNA identified the following needs to establish, develop, or improve community rehabilitation programs within the state:

- There was a need for job coaches noted throughout the state by providers, DVR staff and partners. This service has been especially hit hard by turnover in providers due to COVID. Interview participants indicated that job coaches and other Community Rehabilitation Program (CRP) staff are able to make much more money in other jobs in the current economy, so they are leaving in large numbers, and this severely impacts the capacity of providers to deliver services;
- Several participants indicated a need to improve the quality of job placements provided by vendors. This was a recurring theme in multiple interviews. Placements were described as primarily entry-level and low paying;
- CRP and provider staff were very appreciative of the rate increases DVR authorized during the pandemic, indicating that these increases helped many of them stay afloat during the pandemic;
- The need for IPS services throughout the state was identified by interview participants, especially since individuals with mental health impairments continue to constitute a large percentage of those served by DVR; and
- CRP and other providers articulated gratitude for the training that DVR has provided to them in the past and requested that this continues in the future as they have a lot of new staff.

C. GOALS, PRIORITIES, AND STRATEGIES.

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

(1) Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and

DVR developed draft goals in January 2023 to present to the WRC Performance measures and Quality Assurance committee. We presented our goals to a WRC committee in March 2023 and at a full council meeting in May 2023 and obtained feedback. This feedback was incorporated into the state plan goals and strategies and presented to the WRC full council in August 2023.

(2) *Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in Section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—*

- (A) Support innovation and expansion activities;
- (B) Overcome barriers to accessing VR and supported employment services;
- (C) 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); and
- (D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

DVR developed 6 goals based on our most recent CSNA (2021), performance accountability measurements, WRC feedback and recommendations, agency staff survey information on engagement/employee satisfaction, agency staffing data, 2021 Council on Workforce Investment Business Climate Survey, and DVR's DEI needs assessment. Goals are measurable and address consumer barriers to accessing VR and supported employment services, improving services that lead to quality employment outcomes, continued focus on providing services to transition students, and use of innovation and expansion activities when possible.

1. Business Services:

In each program year of the State Plan, engage 2,820 business establishments to understand their business needs, introduce them to DWD Services and enhance hiring and retention of employees with disabilities. The number of business establishments is based on an average productivity standard for each DVR Business Services Consultant.

(Basis: performance accountability, WRC recommendations, 2021 Council on Workforce Investment Business Climate Survey)

- a. Identify and distribute employment opportunities that meet competitive integrated employment standards
- b. Inform business about ways to connect with WDVR talent, including:
 - i. Recruiting directly through WDVR
 - ii. Creating opportunities for career exploration, including informational interviews, job shadows, and work experiences
 - iii. Engaging youth and students in work-based learning, company tours, and virtual events that provide occupational information
 - iv. Connecting to DVR consumers as they advance along a career pathway
- c. Engage business in learning about disability and employment topics, such as increasing disability awareness, creating inclusive work cultures, and adopting strategies to hire and retain disability talent.

- d. Foster relationships between business and WIOA, workforce, and community partners to ensure access to a full scope of resources and services.
- e. BSCs will complete an annual survey to identify training needs.
- f. BSCs will engage in training to learn about competitive integrated employment and disability-related supports that can aid individuals with the most significant disabilities to obtain and maintain employment and share that information with businesses as appropriate.

2. Increase consumer hourly wages:

10%-15% increase of the average hourly wage for consumers exiting with competitive integrated employment by providing needed services to achieve high paying jobs over the state plan timeframe (July 1, 2024 through June 30, 2028).

(Basis: 2021 CSNA, performance accountability, and WRC recommendation)

- a. Increase the number of consumers pursuing a credential by 10% from current percentage. This recommendation includes consumers in supported and customized employment.
- b. Increase Work Incentive Benefits services by 10% to assist consumers understand the use of Work Incentives, Trial Work Periods, and Ticket to Work when pursuing employment to inform individuals how to work off benefits.
- c. Use of LMI data by staff and consumers to identify high quality jobs and training needs during the IPE development process.
- d. DVR Business Services Consultants sharing local labor market information and "hot" job lead information with other staff and consumers.
- e. Continue to implement the Career Pathways Advancement Grant with focus on healthcare, manufacturing, digital/information technology, and construction.

3. Pre-employment Transition Services:

DVR will continue to achieve the Pre-Employment Transition Services 15% expenditure goal in each Federal Fiscal year during the State Plan timeframe by providing outreach and needed Pre-Employment transition services to students with disabilities throughout the state ensuring they can explore and achieve competitive integrated employment. (Basis: performance accountability, WRC recommendation, 2021 CSNA)

- a. DVR will continue to assign a DVR staff to each public high school to provide outreach, technical assistance, information and referral to secondary education officials in those schools, attend Individualized Educational Plan (IEP) meetings when invited and available, and provide Pre-ETS services to potentially eligible and eligible students.

- b. DVR staff will provide information regarding DVR services at in-service/teacher trainings, local job fairs, parent teacher conference, statewide conferences and CCoT meetings.
- c. DVR staff will work with eligible students and their teams to coordinate transition services, braid funding between DVR and local schools as needed, explore career options, provide Pre-ETS services and other necessary services, and support them towards achieving their employment goals.
- d. At the local WDA level, develop summer work experiences, workplace readiness training to develop social and independent living skills, and other work-based learning experiences to meet the Pre-ETS service needs.

4. Staff Engagement:

Increase DVR staff engagement by improving DWD Employee Engagement survey results to 3.5 or higher out of 5 on a Likert scale in all areas of the survey to nurture a positive work environment which will improve employee retention; increase employee productivity; advance good customer service towards consumers and business partners; and aid in the recruitment and advancement of DVR staff.

(Basis: Agency's staff engagement, recruitment, and retention data, DVR's DEI Needs Assessment)

- a. Advocate for pay increases for staff and for review of possible pay adjustments based on equitable pay structures as outlined in the Wisconsin State Employee Compensation Plan, Discretionary Equity and Retention Adjustments. This is accomplished through discussions with Human Resources staff and DWD Secretary's Office.
- b. Broadly share job postings and promotional opportunities with diverse audiences to attract qualified applicants.
- c. Provide monthly trainings to educate and refresh staff on a variety of topics. Regular training will promote consistent statewide practice, enhance customer service, and instill greater confidence in staff as they perform job responsibilities.
- d. Conduct Stay Interviews at least biannually to cultivate and improve supervisory relationships and learn what staff enjoy about work, what they would like more of or less of on the job, and how their supervisor can help them succeed.
- e. Encourage staff to complete annual surveys distributed by the Wisconsin Department of Workforce Development that measure employee engagement levels. Use the results to determine and implement policy and process changes necessary to improve staff morale.
- f. Utilize DVR's Employee Engagement Team to solicit feedback from staff on training needs, hiring and promotional practices, effectiveness of management communication, and other topics raised by staff that will improve engagement and result in employee retention.
- g. Implementation of DVR's DEI Action Plan strategies that focus on building safe and supportive workspaces for staff.

5. Service Provider Capacity:

DVR seeks to reduce the number of consumers impacted by a DVR service provider wait list by 20% by the end of the state plan timeframe (June 30, 2028) thereby increasing services provider capacity.

For more than 5 years, WI DVR has identified a decrease in the capacity of service providers with a DVR service agreement to deliver authorized services in a timely manner. This has caused a delay in progress for consumers. DVR has defined a service Provider waitlist to be a situation in which a Service Provider is unable to initiate a service(s) within 30 calendar days of receiving a DVR service authorization or continue services for 30 calendar days for an existing authorized consumer. The reasons for provider waitlists include: high turnover, low pay, inadequate training, labor market economic factors, lack of professional growth opportunities, lack of consistent credential requirements or qualifications, unpredictable work schedules, changeable work locations, work related travel requirements, reporting requirements, programmatic complexity, funding and fee differences between schools/DVR and long term care agencies, changing nature of work for people with disabilities, shift from sheltered work to competitive integrated employment.

(Basis: WRC recommendation and performance accountability and service provider waiting list data)

The measurement is made using the DVR dashboard report comparing consumer waiting list numbers tracked and averaged on a quarterly basis.

- a. Increase awareness and understanding about the impact of a service provider wait list on consumers and the programmatic health of the DVR program. Provide information to the provider and stakeholder community including the locations, number of consumers, services, and budgetary impact of wait lists.
 - i. Provide regular updates using the DVR dashboard waitlist report and to the providers, programs and agencies serving common customers.
 - ii. Provide information on use of and need for the DVR wait list mechanism available to all DVR statewide service providers.
 - iii. Provide technical assistance directly to providers experiencing a wait list.
- b. Work to stabilize and expand the workforce of individuals who work in key positions including job developers, those who complete key assessments and systematic instruction providers by encouraging professional training and recognized credentialing opportunities to creating upward mobility for quality providers and improve service quality.
 - i. Promote credentialed training opportunities meeting Association of Community Rehabilitation Education (ACRE) standards and other industry recognized standards.
 - ii. Coordinate implementation of qualification standards with other state departments delivering supported employment services

- c. Stabilize funding and reduce cliff effect when consumer support services transition from one funding source to another in supported employment.
 - i. Encourage transparency from all funding sources to stabilize and grow the provider network. This includes regular and on-going discussions with our partners overseeing and providing long-term care funding such as the Wisconsin Department of Health Services as well as Managed Care Organizations and IRIS (Include, Respect, I Self-Direct) Consulting Agencies (ICA).
 - ii. Regular meetings between DVR and Department of Health Services Leadership to discuss the issues being faced within the Supported Employment system.
 - iii. DVR will monitor and adjust rates of payment to cover costs to deliver services and changing economic factors, not setting rates so low as to effectively deny an individual a necessary service; and not absolute with exceptions permitted so that individual needs can be addressed.
- d. Continue to gather input from DVR staff, providers and others in the workforce and supported employment system in Wisconsin DVR staff to identify the causes of waitlists to develop solutions and adjust approaches as needed.
 - i. Engage in discussions with the Wisconsin Rehabilitation Council (WRC), the DVR Service Provider Advisory Group, related stakeholder forums and gatherings to identify causes and potential solutions to provider wait lists.
 - ii. Include and analyze questions about capacity in the statewide service provider technical specification surveys and the Comprehensive Statewide Needs Assessment.
 - iii. Include in DVR staff and administrative meeting agendas discussion and updates and mitigation plans related to provider wait lists.
 - iv. Identify and implement promising and innovative approaches through reserved innovation and expansion funds to increase effectiveness of services and increase provider capacity in partnership with DVR service providers and stakeholders.
- e. Continue with active statewide partnerships and provider outreach

6. Diversity, Equity, and Inclusion:

DVR will focus on increasing the current percentage of underrepresented/marginalized groups who have an IPE that leads to successful closure. DVR will also increase the percentage of consumers of Hispanic/Latino ethnicity who apply for DVR services.

DVR will implement a 5-year DEI Action Plan beginning in March 2023 focused on equitable experiences for consumers from underrepresented and marginalized groups. DVR will analyze our data each program year by determining the percentage of American Indian, Asian, Black/African American, Hawaiian/Pacific Islander, White, and Multi-Race consumers within the following categories: new applicants, new eligibilities, new IPE's, education and training services, pre-employment transition services and successful employment outcomes.

(Basis: 2021 CSNA, DVR 2022 DEI Needs Assessment, 2023 Wisconsin CIE Plan Report).

- a. DVR will develop a DEI foundational training series for staff.
- b. DVR will focus on consumer engagement through rapid engagement and customer service training.
- c. DVR will add language to service provider agreement acknowledging a DEI focus as well as provision of DEI training for Service Providers.
- d. DVR will develop additional data reports on the DVR data platform (Dashboard) focused on the consumer experience from the perspective of underrepresented and marginalized groups, e.g., wage data by demographics, service provider data by demographics.
- e. Creation of local level DEI Action Plans which will focus on consumer outreach targeting underrepresented and marginalized groups and development of community partnerships.
- f. Increase staff diversity through a review of hiring practices and using tools such as added pay for bilingual counselors.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS.

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

- (1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs.

- Goal 1 Business Services:

In Program Year 2022, DVR's Business Services Consultant (BSC) staff (12) engaged with 2903 business establishments providing 7918 services to these businesses. Services include activities such as employer information and support services, workforce recruitment activities, access to the untapped labor pools through DVR job seekers, and training.

During PY2022, DVR made some structural division enhancements and created a Business Services Section within DVR's Bureau of Management Services. BSC staff were then brought under the supervision

of DVR's Business Services Section Chief. Previously each BSC position had been supervised by different local DVR Directors. This effort was made to enhance and streamline DVR's services to employers.

DVR's Business Services Section is working on a local business outreach plan template for each BSC to use in the workforce development area they work within. This will help the BSC staff be strategic in their business outreach efforts. have in the past worked from local employer outreach plans.

The Business Services Section Chief can provide consistent training and direction to the BSC staff. BSC are involved in mandatory trainings required by DVR and can attend other trainings that meet their needs. Over the next few program years, there will be an effort to provide training related to the employment needs of consumers with the most significant disabilities. Most DVR BSC staff were trained on Windmills and have been providing this training to our workforce partners as well as employers. BSC staff will continue to offer training to employers based on their needs.

DVR's Business Services Section is working on enhancing marketing materials as well as updating the DVR Business Services webpage.

- Goal 2 Employment Outcomes

In Program Year 2022, DVR consumers who were closed successfully working earned an average wage of \$17.55/hour and worked 25 hours per week. In Program Year 2021, the average hourly wage was \$15.86/hour at 25 hours per week. To continue to help increase quality outcomes, DVR would like to also look at increasing the amount of benefits counseling services that are provided to SSI/SSDI recipients so that they can make informed choices about work hours and pay rate. In Program Year 2022, DVR provided 4867 benefits counseling services. DVR also has focused on training staff on the use of labor market information with consumers for planning purposes. DVR has added useful labor market information resources and will continue to build staff knowledge and access to resources in this area over the next few program years. DVR'S Business Services Consultants have provided labor market information to DVR staff as needed and will continue to build on this. DVR has been implementing the Career Pathways grant to help individuals maximize employment outcomes. In Federal Fiscal years 2022 and 2023 (as of August 2023), DVR has enrolled 415 consumers in this grant. This grant lasts for 5 years.

- Goal 3 Continued Focus on Pre-ETS:

In FFY22 the Pre-Employment Transition services 15% expenditure goal was \$9,945,503. In FFY22 DVR spent \$11,226,399 in Pre-ETS services. The FFY23 expenditure goal is \$10,577,981. DVR is on track towards achieving this goal.

In PY22 DVR has a staff assigned to each public high school, provided transition services and outreach, provided trainings and information to partners, parents, and teachers through a variety of methods to help ensure we are meeting our Pre-ETS expenditure goals. DVR has also started using data from the State Education Agency, Department of Public Instruction, related to numbers of students with disabilities in each district and comparing to DVR consumers who are student to target areas where we could get more referrals from.

- Goal 4 Staff Engagement:

DVR continues to use the DWD Staff Engagement surveys that are completed every year. The 2022 DWD Employee Engagement results showed the following areas needed improvement: having staff feel like their opinions count, trusting that leadership is looking out for best interests of staff, and receiving

recognition. DVR's leadership and employee engagement team focused on the area of trust. The DVR employee engagement team created a survey centered around gathering feedback on how trust could be improved. The DVR trust survey results were received in May 2023. At this same time, DVR received our results from the 2023 DWD Employee Engagement survey.

The following are some key take-ways from the 2023 DWD Employee Engagement Survey:

- DVR should comply with all recommendations in the 2023 Department Wide Employee Engagement Survey Report, particularly those related to the job satisfaction barrier Anonymity, and the RESPECT models areas of Empowerment and Consideration, as those were area identified for improvement for DVR.
- DVR should review current programs for employee recognition, as well as policies and procedures for supervisor support and supportive feedback towards front line staff. Staff recognition and increasing feelings of support amongst staff should be a priority for the DVR engagement team in the upcoming year.
- Communication or training programs should be distributed by division leadership regarding the procedures for reporting harassment, bullying, or discrimination. Division leadership should make a point to show their support for these reporting programs.
- Additional effective communication training for DVR supervisors is also recommended.
- Continuous Improvement (CI) and "Moving Up-Down-and-Around" (MUDA) training is advisable for DVR staff. CI training can assist with workflow processes and can help alleviate feelings of being overwhelmed by workload. MUDA training is also helpful for showing staff what a long and successful career can look like at DWD.

DVR leadership and employee engagement team worked on an Employee Engagement Action plan to address the results of the DWD Employee Engagement Survey and DVR Trust Survey.

Over the 2022 and 2023 DWD Engagement Surveys as well as the Trust Survey, staff concerns with pay continue to be stated. DVR has and will continue to work within the parameters of the state compensation plans to leverage pay adjustments. Over the last 2 years, DVR has been able to provide a large number of equity pay adjustments.

In 2022, DWD asked that all managers complete stay interviews with staff. DVR will continue to complete these at regular intervals and review the results.

DVR's Employee Resource Group created and released a survey to DVR employees in September 2021 to employees covering a wide range of topics, including participant demographics, DEI sentiment, experienced microaggressions, reporting of microaggressions and support of those experiencing microaggressions, career development, and respondent ideas to foster DEI and inclusion. This provided information on how we could help support and engage DVR staff and helped to inform the DVR DEI Action Plan as well as elements of this state plan goal.

- Goal 5 Service Provider Capacity

August 2023 Service Provider Capacity data (first quarter with data):

- 37 providers with a published wait list, 185 with no wait list
- 195 consumers of approx. 12,000 in the quarter with IPE's on a provider wait list
- 8 statewide services of 8 with a provider wait list
- 46 Wisconsin counties of 72 with a provider wait list
- 9 Workforce Development Areas of 11 with a provider wait list

DVR has begun regular meetings with referral partners in supported employment to problem solve how to provide supports in a timelier manner for individuals closed by WI DVR.

DVR has also completed a process mapping using lean principles to examine the supported employment case process experience from the consumer experience. Several recommendations are being implemented to find efficiencies and provide timely and accurate information to consumers and their families about competitive integrated employment.

DVR leadership organizes routine meetings with Wisconsin Department of Health Services leadership to discuss the overall health of the supported employment system and the needs of our mutual consumers with the most significant disabilities.

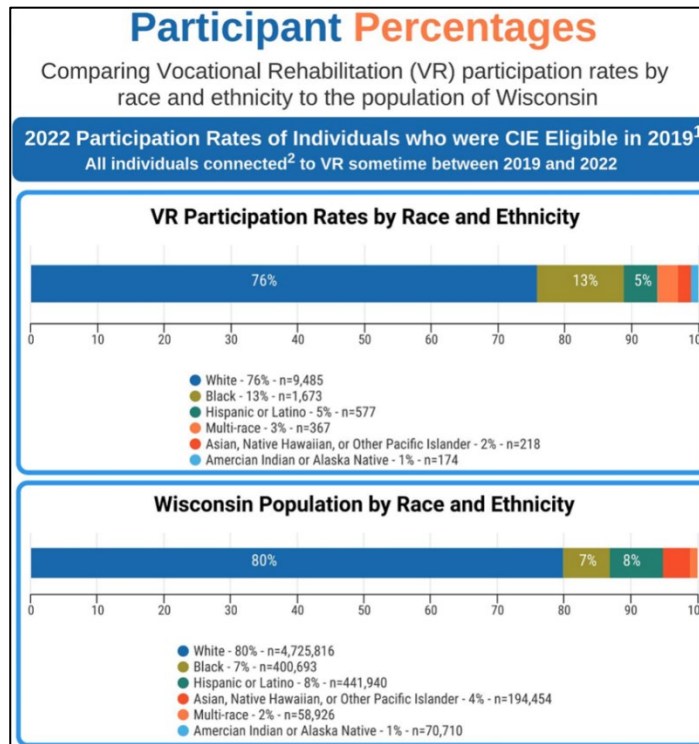
DVR is also part of a required statewide Competitive Integrated Employment Plan. The State Fiscal Year 2024-2025 plan includes some specific targets related to supported employment: 1) Implementation of a 5-year strategic plan to promote quality and broaden access to IPS 2) Operationalize interagency sharing of supported employment assessment and other information that supports individual employment outcomes.

DVR is an active member of the IPS state team and has identified a Policy Analyst position to take the lead in efforts to coordinate IPS services statewide and provide technical assistance.

- Goal 6 DEI:

Several data sets were reviewed in addition to the 2021 CSNA and 2022 DEI Needs Assessment to determine this goal and describe where DVR is currently at with serving consumers in underrepresented/marginalized groups. These other data sets included 2022 US Census data for Wisconsin, State Fiscal Year 2023 Annual Report Wisconsin Act 178 Increasing Competitive Integrated Employment Outcomes, DVR's Data Dashboard on Demographics for Program Year 2022, Wisconsin Transition Improvement Grant (TIG) 2022 Statewide Report of 2020-2021 Exiters with Disabilities, and the Mental Health Community Services Block Grant: 2021 Wisconsin State Summary Report.

In general, Wisconsin DVR participation of underrepresented/marginalized groups mostly mirrors state breakdown by race and ethnicity. There is an increase in DVR participation amongst DVR consumers who identify as Black (13 percent in services with DVR versus 7 percent by overall state population). We do observe the opposite effect in participation amongst individuals who identify as Hispanic or Latino (5 percent in services with DVR versus 8 percent by overall state population).



If you compare the participation of the various race and ethnicity groups in DVR during Program Year 2022 is it similar to the participation rate of these same race/ethnic groups receiving special education services (Wisconsin TIG Report) with the exception of individuals who identify as Hispanic or Latino, which is lower for DVR. Doing outreach within schools and agencies that relate to the Hispanic/Latino community would help DVR to increase the participation of this group of individuals along with a focus on hiring more bilingual DVR staff.

Wisconsin 2022 Statewide Report of 2020-2021 Exited with Disabilities
Comparison of Statewide Population and Statewide Respondents
All Participating Districts

	Statewide Population *		Statewide Sample *		Ineligible State Sample *		Statewide Respondents	
Totals	N=7854		N=6892		N=206		N=4881	
Male	5269	67%	4605	67%	142	69%	3272	67%
Female	2584	33%	2287	33%	64	31%	1609	33%
White	4898	62%	4205	61%	96	47%	3149	65%
Minority	2956	38%	2687	39%	110	53%	1732	35%
American Indian/Alaskan Native	153	1.9%	125	1.8%	5	2.4%	83	1.7%
Asian	185	2.4%	180	2.6%	1	0.5%	126	2.6%
Black or African American	1280	16.3%	1184	17.2%	51	24.8%	729	14.9%
Hispanic / Latino	1012	12.9%	916	13.3%	36	17.5%	600	12.3%
Native Hawaiian or Other Pacific Islander	4	0.1%	3	0.0%	0	0.0%	1	0.0%
Two or More Races	321	4.1%	279	4.0%	17	8.3%	193	4.0%

DVR's Dashboard on Demographics for Program Year 2022 shows differences in the percentage of several race/ethnicity groups when you consider the percentage of each group that moves from

developing an IPE with DVR to being closed successfully. DVR has recently implemented a DEI Action Plan that will focus on strategies like staff training, consumer engagement, and a review of the application of our policies to improve the experience of underrepresented groups within the DVR program.

Program Year 2022 DVR Dashboard												
	New Applicants	% New Apps (of total)	New Eligibilities	% Elig (of Apps)	New IPEs	% IPEs (of Elig)	Edu/ Trng Services	% in E/T (of IPEs)	26's	% 26's (of IPEs)	Pre-ETS	% PreETS (of total)
American Indian	367	3%	257	70%	167	65%	25	15%	48	29%	207	4%
Asian	213	2%	196	92%	154	79%	13	8%	71	46%	149	3%
Black	2088	18%	1777	85%	1101	62%	126	11%	336	31%	555	10%
Hawaiian/Pac Islander	23	0%	17	74%	17	100%	3	18%	4	24%	17	0%
White	8352	71%	7470	89%	5460	73%	683	13%	2538	46%	4252	78%
Multi Race	468	4%	374	80%	249	67%	38	15%	82	33%	259	5%
N/R	267	2%	231	87%	155	67%	18	12%	45	29%	10	5%
TOTALS	11778		10322		7303		906		3124		5449	
Hispanic	957	8%	801	84%	554	69%	80	14%	218	39%	543	10%
Non-Hispanic	10622	90%	9346	88%	6627	71%	812	12%	2866	43%	4902	90%
N/R	199	2%	153	77%	122	80%	14	11%	40	33%	4	0%

(2) Performance on the performance accountability indicators under Section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and

Measure	PY22 Negotiated Level of Performance	Actual Performance
Measurable Skills Gain (MSG)	48.8%	62.9%
Credential Attainment	29%	41.4%
Median Earnings	\$3,100	\$3,362
Quarter 2 Post Exit	52%	56%
Quarter 4 Post Exit	49.8%	53%

- (3) The use of funds reserved for innovation and expansion activities (Sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).

WI DVR reserves funds for the operation of the SILC known in Wisconsin as the Independent Living Council of Wisconsin (ILCW). WI DVR fully funds but does not reserve funds for the operations and activities of the SRC (WRC) as needed annually including covering travel costs for WRC identified members to attend state and national meetings.

WI DVR fully funds but does not reserve funds for innovation and expansion projects in Wisconsin. WI DVR has initiated several projects using and measuring the effectiveness of innovative approaches to expand and improve vocational rehabilitation services.

WI DVR has partnered with the University of Wisconsin at Green Bay to assign an upperclassman with a disability as mentor to an underclassman student with a disability. The mentors receive credits and training and on being a mentor and the mentees receive credits to implement a plan to improve college and community engagement. The goal is to determine if post-secondary students have better outcomes when they have a mentor.

WI DVR has initiated a project called "Thinking Skills for Employment" to use cognitive behavior strategies to improve the employment experience for individuals with mental health barriers. The goal is to determine if working individuals can maintain employment more successfully when they have training on changing thinking patterns about their own success.

Another project WI DVR has implemented is Step Into STEM. This project was designed to provide hands on experience and exposure to various jobs in science technology engineering and math for youth. The goal is to allow for career exploration in these higher paid occupations and provide basic skills and experience prior to enrollment in post-secondary options or employment.

WI DVR has continued to monitor and foster previously initiated projects including Partners with Business and Explore Work. Partners with Business is a strategy for providing on the job support using a consumer's co-workers instead of a provider employee. The employer is reimbursed for the time a co-worker spends assisting a consumer. This service is especially effective for consumers transitioning to Long Term Supports in Supported Employment but can also be used for consumers that will not.

Explore Work is a web-based learning program that covers topics critical to a successful career outcome. The modules are geared toward youth but may be helpful for adults as well. Individual remotely delivered sessions may be authorized to ensure timely and appropriate services for the consumer. Skills are taught using a variety of activities that are engaging and targeted to youth or adult learner.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

- (1) Acceptance of title VI funds:

(A) **X - VR agency requests to receive title VI funds.**

(B) [check box] VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

(2) If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

Goals and Priorities:

WI DVR accepts the title VI funds and utilizes the full grant award. In FFY 22, the entire grant award and matching state funds was used to fund services for youth and adults with the most significant disabilities in supported employment. The services have assisted consumers following the placement in permanent competitive integrated employment through the delivery of ongoing job supports. Several State Plan 2024-2027 goals/priorities and strategies address the experience of consumers in supported employment programs. DVR is prioritizing the need to increase the quantity of DVR services providers providing quality supported employment services. DVR will also focus on increasing the average hourly wage and hours worked per week for consumers in supported employment. Individuals participating in Supported Employment services for Program Year 2022 earned an average wage of \$12.07 per hour and worked an average 14 hours per week. This was an increase from Program Year 2021.

(3) Supported employment services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe 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; and the timing of transition to extended services.

WI DVR uses both title 1 funds and title VI funds to deliver supported employment services in Wisconsin.

Quality

Individuals participating in Supported Employment services for Program Year 2022 earned an average wage of \$12.07 per hour and worked an average 14 hours per week. Individuals not in Supported Employment earned \$18.43 per hour and worked an average of 28 hours per week. Both groups increased the average hourly wage by about \$2/hour.

Scope

WI DVR also provides specialized services prior to supported employment to assist individuals in finding employment to meet their individual goals and interests as well as matching their skills. Individuals in Supported Employment are provided supports until they are deemed to be stable in employment and then they are transitioned to long term supports. In Wisconsin long term supports are provided by Medicaid funded managed care and county mental health agencies.

Extent

Supported Employment services are available in all counties in Wisconsin which could include typical Supported Employment, Individual Placement and Support, or Customized Employment.

In Program Year 2022 WI DVR transitioned 747 individuals to long term supports, 741 of these resulted in a successful closure for Wisconsin DVR. This was approximately 24 percent of WI DVR closures.

(4) Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(c)(19)(v).

WI DVR has formal agreements with the state Medicaid Adult and Mental Health and Education agencies to facilitate cooperative service delivery and transition to long term supports once a job is stabilized in supported employment. In addition, WI DVR has service agreements with community rehabilitation programs to deliver the services directly to DVR consumers with the most significant disabilities in supported employment. WI DVR funds ongoing support services up to 24 months prior to transition to a long-term support agency and extended services for up to 48 months for youth underage 25.

WI DVR has a Competitive Integrated Employment Plan per WI Act 178 Legislation. The SFY 2024-25 Plan includes the following activities that are related to Supported Employment Services for DVR.

- Finalize and implement a strategic five-year plan to broaden access to IPS including implementing three new IPS sites in each year of the joint plan.
- As a result of the supported employment Lean Value Stream Mapping Process completed in 2022, operationalize interagency sharing of supported employment assessments, and other information that supports individual employment outcomes.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

(1) Estimates for next Federal fiscal year—

(A) VR Program; and

During FFY 2021, DVR served 25,846 individuals with disabilities.

During FFY 2022 DVR served 26,040 individuals with disabilities.

During FFY 2023 DVR has served 23,354 individuals with disabilities as of June 3, 2023. *(Considering a review of trends for new applications, we anticipate that in the remaining months left in FFY 2023 we will end up serving a total of 26,500 individuals with disabilities.)*

For FFY 2024, our projected goal is 27,500 individuals with disabilities served. FFY2024 spending goal is roughly \$2000/case, totaling \$55,000,000.

For FFY 2025, our projected goal is 28,325 individuals with disabilities served. FFY 2024 spending goal is roughly \$2040/case, totaling \$57,750,000.

This goal is realistic given our Title I funding levels and need to spend budget during the 2-year period of performance. This is based on the economy, unemployment rate, intended federal/state match funding, consumer data/patterns, and VR policies remaining constant.

While Wisconsin DVR does have Order of Selection in place, we currently are immediately activating anyone who falls into Categories 1 and 2. Individuals in Category 3 are activated the first of every month based on available resources.

The number of individuals falling into Category 3 (activated every month):

FFY 2021 = 57 individuals in Category 3

FFY 2022 = 47 individuals in Category 3

FFY 2023 = 33 individuals in Category 3

Most recent completed data Program Year 2022 (July 1, 2022 through June 30, 2023):

Category 1 = 10,796 consumers, \$33,990,718 total expenses

Category 2 = 6,882 consumers, \$15,531,593 total expenses

Category 3 = 43 consumers, \$190,546 total expenses

(B) Supported Employment Program.

In FFY 2021 there were 4038 individuals within DVR's supported employment program including IPS and CE.

In FFY 2022, there were 4418 individuals within DVR's supported employment program including IPS and CE.

In FFY 2023, there have been 3753 individuals within DVR's supported employment program including IPS and CE (as of May 31, 2023).

All individuals within DVR's supported employment programs are in OOS Category 1. Average cost per cases in OOS Category 1 are roughly \$3000/case.

In FFY 2022, DVR provided supported employment, customized employment, and IPS services to 1532 individuals with the most significant disabilities hired into competitive and integrated employment and successfully transitioned to long-term support services. In FFY 2022, the total costs of these supported employment, customized employment, and IPS services after a person was hired into competitive integrated employment was \$5,957,279.

In FFY 2023 as of August 15, 2023, DVR provided supported employment, customized employment, and IPS services to 1303 individuals with the most significant disabilities hired into competitive and integrated employment and successfully transitioned to long-term support services. In FFY 2023 as

of August 15, 2023, the total costs of these supported employment, customized employment, and IPS services after a person was hired into competitive integrated employment is \$5,924,125.

For FFY 2024, we estimate that roughly 4,000 individuals will be served within DVR's supported employment program including customized employment and IPS. An estimated 1550 individuals within the supported employment program will obtain permanent competitive integrated employment, receive on-going support services, and transition to long-term support. The estimated costs of supported employment services including customized employment and IPS after an individual is hired into competitive integrated employment are estimated to be \$6,100,000.

For FFY 2025, we estimate that roughly 4,050 individuals will be served within DVR's supported employment program including customized employment and IPS. An estimated 1575 individuals within the supported employment program will obtain permanent competitive integrated employment, receive on-going support services, and transition to long-term support. The estimated costs of supported employment services including customized employment and IPS after an individual is hired into competitive integrated employment are estimated to be \$6,300,000.

We are anticipating rate increases for DVR service providers providing supported employment services.

After Wisconsin DVR exhausts all funds under the Title VI supported employment program (50% used for youth), Title I funds are used for supported employment costs.

G. ORDER OF SELECTION

The VR agency is **not** implementing an order of selection and all eligible individuals will be served.

X - The VR agency is implementing an order of selection with one or more categories closed.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

Pursuant to Section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

(1) For VR agencies that have defined priority categories describe—

(A) The justification for the order;

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 internship/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, long term, and career focused job goals with consumers that often requires the pursue of 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 at times.

- (B) The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

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.

DVR will continue with the current OOS plan, which has the support of the Wisconsin Rehabilitation Council (WRC), if resources are available. Categories 1 and 2 will continue to be activated immediately, and other eligible consumers with disabilities will remain on a wait list in Category 3 with review of resources and activation of these cases at the beginning of each month. Category reassessment can be completed at the request of the consumer.

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, two or three 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 have a disability, however, their disability does not seriously limit one or more functional capacities and/or they do not require multiple services over an extended period.

DVR has developed a resource management dashboard and forecasting/projection tools. DVR reviews this tool monthly to determine resources (staff and financial) and consumer demands to project changes to priority categories.

- (C) The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

The following shows the amount of time (in months) it took from IPE development to successful closure in PY 2021 and current data for PY 2022 up to June 1, 2023, for consumers in Categories 1, 2, and 3:

Category	PY 2021	PY 2022 (up to June 1, 2023)
Category 1	28 mos.	27 mos.
Category 2	25 mos.	23 mos.
Category 3	6 mos.	7 mos.

Consumers with the most significant disabilities are given priority, consumers with significant disabilities are given second priority, and other eligible consumers with disabilities are given third priority.

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. As of December 2020, DVR began and continues to activate all consumers on the waitlist monthly.

DVR has activated 204 individuals from Category 3 waitlist from December 2020 to May 2023.

DVR evaluates resource availability and determines if OOS Category 3 consumers can be activated that month. If at a point in the future DVR determines resources are not available and it cannot activate Category 3 consumers, DVR contacts those individuals, at least annually, to notify them of their waitlist status and provide other employment resources. At any time, individuals on the waitlist may choose to be removed or provide information for review of their category placement.

When consumer is notified of Eligibility for DVR and their placement in one of the three (3) OOS Categories, regardless of OOS category placement, the consumer is also given information and referral to their local job center and other employment resources.

(2) Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

Yes

No

H. WAIVER OF STATEWIDENESS

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate “not applicable.”

Not Applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

(1) Analysis of current personnel and projected personnel needs including—

- (A) The number and type of personnel that are employed by the State VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

Table below includes the type and number of personnel employed by DVR.

Permanent Authorized Employees

Job Title	Total Positions
Vocational Rehabilitation Counselor	178
Vocational Rehabilitation Specialist	46
Office Operations Associate (field)	2
Financial Specialist-Senior	39
Field Managers/Supervisors	25
Business Services Consultants	12
Central Office Senior Leaders	8
Central Office Support Staff	28
Total	337

Allocation of positions for local Workforce Development Areas (WDAs) statewide is based on several factors including referrals, applications, eligibilities, IPEs, and caseloads. The current ratio of qualified vocational rehabilitation counselors to clients is approximately 1 counselor to 90 clients. DVR has two position classifications in addition to counselors to assist with managing workload, recruitment, and staff retention. One position is a Vocational Rehabilitation Specialist, designed to allow counselors more time to focus on counseling by these positions 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 qualified DVR Vocational Rehabilitation Counselors 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.

- (B) The number of personnel currently needed by the State VR agency to provide VR services, broken down by personnel category; and

Table below shows the number of permanent authorized positions by personnel category, and the current vacancies as of August 2023 for each category.

Job Title	Total Positions	Current Vacancies /Personnel Needed
Vocational Rehabilitation Counselor	178	9
Vocational Rehabilitation Specialist	46	3
Office Operations Associate (field)	2	0
Financial Specialist-Senior	39	1
Field Managers/Supervisors	25	2
Business Services Consultants	12	1
Central Office Senior Leaders	8	0
Central Office Support Staff	28	3
Total	338	19

- (C) Projections of the number of personnel, broken down by personnel category, who will be needed by the State VR 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.

Table below shows the number of permanent authorized positions by personnel category, and the anticipated vacancies in each category expected in the next five years. DVR anticipates an average turnover rate of approximately 10% percent each year, for the next five years, based on previous data and labor market trends. DVR anticipates the need to maintain the current total number of permanent authorized positions by personnel category over the next five years.

Personnel Category	No. of Personnel Employed	Projected Annual Turnover per Year for the next Five Years (Number of Positions)
Vocational Rehabilitation Counselor	178	18
Vocational Rehabilitation Specialist	46	5
Office Operations Associate (field)	2	1
Financial Specialist-Senior	39	4
Field Managers/Supervisors	25	3

Business Services Consultants	12	1
Central Office Senior Leaders	8	1
Central Office Support Staff	28	3
Total	338	36

(D) Ratio of qualified VR counselors to clients:

Based on our case numbers slowly increasing and efforts to further increase cases, we anticipate our average ratio of VR Counselor to client during this State Plan period to remain as it currently or have a slight increase. We anticipate the ratio to range from 1 VRC to every 90-100 clients

(E) Projected number of individuals to be served in 5 years:

WI DVR had begun seeing a decline in individual numbers beginning in 2018 and a large decline during the pandemic. In PY20 we served 26,131, in PY21 we served 26,436 individuals, and in PY22 we served 27,431. We have seen a slow increase in consumer numbers. If this trend continues, we anticipate serving approximately 27,500 in five years.

(2) Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

- (A) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and 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.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates (Spring, 2023)
University of Wisconsin-Stout	M.S Vocational Rehabilitation Counseling-On Line, only	49 *	18
University of Wisconsin-Madison	M.S Degree in Clinical Rehabilitation Counseling	41	18
Marquette University	Master's in Clinical Rehabilitation Counseling	10	5

*Majority of students already have employment in various DSUs.

- (B) The VR agency's plan for recruitment, preparation, and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and

professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

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 and nationally, 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 sends its postings to a listserv of WI licensed counselors. 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. DVR has also offered sign-on bonuses and relocation expenses to assist in the recruitment of hard to fill positions and has increased the starting pay for several DVR positions to attract qualified candidates.

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.

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.

DVR completed stay surveys with its staff and DWD completes an annual employee engagement survey. 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. Since the pandemic DVR has moved to a hybrid work environment where staff are allowed to telecommute up to 4 days a week depending upon the business needs of their office, consumer needs, and their position. Staff have shared that they appreciate having a hybrid work environment. DVR leaders will also look for additional tools to augment compensation packages to further address retention efforts.

- (C) Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

- i. 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
- ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

The educational needs for DVR personnel are determined based on input from several sources, which include, but are not limited to:

- Rehabilitation Act of 1973, as amended by title IV of the Workforce Innovation and Opportunity Act (WIOA)
- Relevant Federal Regulations through WIOA and RSA, e.g., 34 CFR Part 361
- RSA sub-regulatory language such Policy Directives, Technical Assistance Circulars, etc.
- Information, resources, and training from VR Technical Assistance Centers
- Wisconsin Statutes and Administrative Code (administered by DSPS)
- Professional state councils, (e.g., WRC)
- DVR's Quality Assurance Analyst/Team
- Comprehensive Training Needs Assessment
- Comprehensive Statewide Needs Assessment
- Individual staff performance reviews

Based on several of the above identified sources, DVR's Training Officer develops a training plan and budget each year identifying training and conferences relevant to the education and professional development needs of all staff. Staff are emailed regarding these training opportunities. Staff can also find additional training opportunities and request support from management to attend. Annual employee performance reviews are conducted by management with each employee helping DVR identify training needs for staff. Wisconsin statutes and administrative codes outline specific training needs based on licensure requirements for VR counselors to practice in Wisconsin, e.g., ethics courses. 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. To promote employee engagement and leadership development, all staff are encouraged, and as appropriate, funded to participate in training activities. Additionally, DVR provides training to statewide management staff at bi-monthly meetings.

DVR provides comprehensive new staff training to all new employees. This training program examines DVR processes from point of application, eligibility assessment, IPE development, provision of VR services such as training and job placement, and case closure. The program also incorporates material on rehabilitation technology resources, effective counseling and assessment practices, the Rehabilitation Act, and WIOA performance measures, and other key components of successful rehabilitation outcomes.

DVR continues to ensure that all staff understand and are trained to meet job description performance standards. DVR uses various training modes including local and regional trainings, monthly topic-specific virtual trainings, and all-staff conferences to provide staff training. Training as available in multiple formats including in person, virtual, online/on demand. DVR monthly trainings are offered in real-time, virtually and are also recorded for future viewing. DVR training topics include policy, processes, data collection for WIOA performance measures, refreshers on eligibility assessment and IPE development, ethics, disability-specific education, case documentation, diversity, equity and inclusion topics, and counseling tools such as motivational interviewing, trauma informed care, and effective communication techniques.

DVR also has statewide teams focused on Sensory Disability and Assistive Technology. These teams review and develop policies related to rehabilitation technology needs, identify statewide resources, and provide training to staff on these topics.

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.

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 Leadership Challenge Mentor Experience Program. DVR will continue to support sending one or two managers per year to attend the National Rehabilitation Leadership Institute and training through the National Training Center for Transformational Rehabilitation Leadership. DVR's senior leadership team also attends CSAVR conferences and has allowed other staff to attend virtual CSAVR sessions.

DVR has access to the Department of Workforce Development's electronic training platform called Cornerstone. Staff can seek out many different types of training opportunities through this platform. This platform also tracks completed training. The Department of Workforce Development also requires annual trainings for all staff related to Diversity, Equity, and Inclusion, Records Management, IT/Security, Protection of PII data, and Wisconsin's Mandatory Reporting Law.

DVR developed a platform called the Information Center that provides online access to VR regulatory and program policy information on key issues and topics of relevance to program staff. The Information Center includes VR federal and state requirements and rules, policy interpretations, procedures, guidance, and informational items in a Q&A format. The Information Center also features a search option that cross-references and indexes all the policies, directives, and related guidance affecting the VR program.

DVR employs two full-time Policy Analysts who provide ongoing technical assistance, consultation, and training to staff statewide on service delivery issues as mandated by the Rehabilitation Act/WIOA. DVR Policy Analysts 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 share information from these meetings with staff in their respective local area. DVR WDA Directors and Supervisors meet regularly, during which various training topics are addressed so that they can train and support staff locally. Statewide emails are also sent notifying staff of new or changed policies and housed as a chronological announcement in DVR's Information Center. Staff can also access research information disseminated through teleconferences and webinars sponsored by RSA and the national network of disability research and training entities. Research findings and promising techniques, including information from the RSA Technical Assistance Centers and CSAVR, are regularly shared with staff. DVR will continue to emphasize the need to use and apply research when developing guidance, best practices, and staff trainings.

- (3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—
 - (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
 - (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 Licensed Professional Counselor (LPC). Under these rules, individuals who practice professional counseling must have a state license or hold a temporary or training license. 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 and pass the National Board for Certified Counselors (NCC) exam or the Commission on Rehabilitation Counselor Certification (CRCC) exam. 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. 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) Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

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 (CART) services. Verbal foreign language interpretation is available, on demand, via phone using a contracted vendor. 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. Translations of DVR's most frequently used publications and forms exist in English, Spanish, and Hmong, and can be translated into other languages using a contracted vendor. Written information can also be translated to braille or a large print format using a contracted vendor. Additionally, the Department uses a standard translator option on many of our public facing webpages.

- (5) As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with 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. 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's Statewide Transition Action and Resource Team (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.

COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)

J. COORDINATION WITH EDUCATION OFFICIALS

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

- (1) Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of

educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.

Pre-Employment Transition Services (PreETS)

WI DVR in collaboration with local educational agencies are required to offer to transition age high school students with disabilities (ages 14-21) Pre-Employment Transition Services (Pre-ETS) using 15% of our federal allocation on an annual basis. Pre-ETS services include:

- Job exploration counseling
- Work-based learning experiences, (which may include in-school or after school opportunities, experience outside the traditional school setting including internships, that are provided in an integrated environment)
- Counseling on opportunities in comprehensive transition or enrollment in postsecondary educational programs
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy/peer mentoring

WI DVR is required to spend 15% of our grant award during each Federal Fiscal Year (FFY). To achieve the expenditure goal of 15%, each WDA is given an expenditure target. To reach those goals each WDA is ensuring they have a strong relationship with the local school districts and the local Work Force Development Boards. Summer work experiences, workplace readiness training to develop social skills, Explore Work sessions, Project SEARCH programs, independent living, and other work-based learning experiences have been implemented statewide. Wisconsin DVR has achieved the 15% Pre-ETS spending goal each year since it has been measured.

DVR has developed a Pre-ETS Policy Guide. This policy guide serves as guidance to DVR staff and describes statewide service provision to students with disabilities, specifically regarding pre-employment transition services (Pre-ETS), and to youth with disabilities, specifically regarding limitations on subminimum wage employment (Section 511). This guide also contains policy on providing Pre-ETS to potentially eligible students as defined by WIOA.

Per WI DVR policy students with disabilities are recommended to apply for DVR services at least two years prior to graduation. The plan for employment should be developed as soon as possible, but the time shall not exceed 90 days after the enrollment. DVR staff will use rapid engagement and motivational interviewing techniques when working with this population. DVR in collaboration the local education agency will provide services to assist the student in developing and successfully achieving their Individual Plan for Employment (IPE) goal.

On a statewide basis, DVR has designated high school transition staff to provide leadership, information and referral, advocacy, technical assistance, and to promote collaboration among consumers, parents, adult service providers, and other service agencies. The designated DVR transition staff consists of a Statewide Coordinator and the Statewide Transition Action and Resource Team (START). START has a DVR representative from each of the eleven Workforce Development Area's (WDAs) in the state. For their respective areas, the START members take lead responsibility for transition services delivered across

their WDA. This lead responsibility includes coordination of activities and training of other DVR staff. DVR staff is also involved in various local transition councils and statewide transition initiatives.

To facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services, DVR will:

- Continue to have counselors assigned to each school district and/or school building as identified by DPI. It is the role of the assigned liaison counselors to provide outreach, technical assistance, information and referral to the secondary education officials in their assigned schools and districts as well as to assure the provision of direct services to eligible youth.
- Maintain the Interagency Agreement with the Department of Public Instruction (DPI) to include the Medicaid agency, the Department of Health Services (DHS). DVR utilizes this agreement as the official document to guide its coordination of transition activities for youth with disabilities as they move from school to post-high school vocational rehabilitation services with education officials and with long-term care and employment support providers.
- Promote the use of the web-based Transition Technical Assistance Guide (TAG) to compliment the Interagency Agreement. The TAG details and supports the interagency coordination processes and procedures to deploy the necessary supports and activities for DVR eligible youth to successfully transition from school to post-high school employment. The TAG includes roles and responsibilities of each participant in the transition process, frequently asked questions, acronym and definitions, and best practice examples.
- Assign committed staff to participate in the Wisconsin Community on Transition (WiCoT) leadership team. The WiCoT is comprised of state level leadership whose focus is on areas of transition for youth in Wisconsin. The WiCoT promotes our vision of: All youth with disabilities will transition to a healthy, full, meaningful life. This team is comprised of leadership from the Department of Public Instruction, Division of Vocational Rehabilitation, Department of Health Services (Integrated Employment and Children Service), Transition Improvement Grant, Independent Living Center, Children and Youth with Special Healthcare Needs, Youth Apprenticeship Program, Wisconsin Technical College System, and Family Advocate Organizations.

Interagency Agreement on Transition between DVR, DPI, and DHS

DVR also has a tri-agency Interagency Agreement that defines necessary relationships, policies and procedures between the DVR, and the Departments of Public Instruction (DPI) and Health Services (DHS). The intent of the agreement is to clearly define necessary relationships, communication, and procedures between DPI, DWD-DVR, and DHS to establish collaborative efforts for service delivery to improve CIE outcomes for individuals with disabilities. This agreement also includes elements of the CIE Plan required under 2017 Wisconsin Act 178 legislation. The interagency agreement was originally developed in 2010 and was revised in June of 2020. The three agencies also jointly developed a Transition Action Guide (TAG) that is now a web-based tool for all partners in transition process to use to guide their roles and responsibilities in the process. The TAG puts this agreement into practice.

This agreement between DPI, DVR and DHS has four overall priorities supporting integrated employment:

1. To comply with federal legal mandates under CMS, WIOA, the Rehabilitation Act, and IDEA
2. To provide practical guidance, technical assistance, and training to internal and external stakeholders and staff regarding competitive integrated employment (CIE) related services and supports.
3. To provide information on CIE-related services to individuals with disabilities and their family members or guardians so they will be able to participate fully in CIE.
4. To provide stakeholder role clarification within each respective department regarding individuals with disabilities who have CIE-related support needs to ensure seamless, nonduplicative, and transparent services.

DVR staff attends Individual Education Plan (IEP) meetings, with consent from the student and family. DVR is also available to provide information and technical assistance on transition services to teachers, parents, and other organizations and councils.

As outlined in the TAG and DVR Policy, the development of the plan for employment for students who are eligible for plan development, is to occur prior to the student leaving school. DVR staff and educators are encouraged to coordinate the provision of services and transition activities for students who are eligible for both IEP and an IPE services to assist them in transitioning from school to work.

DVR Statewide Transition Action and Resource Team (START)

The DVR Statewide Transition Action and Resource Team (START), supported by the interagency agreement, have the role to improve consistency and engagement in the transition process. The DVR START team and DPI Wisconsin Transition Improvement Grant (TIG) also collaborate to improve consistency in the provision of service to youth with disabilities as they transition from school to post high school activities that include VR services. TIG provides technical assistance to school districts, Cooperative Educational School Districts (CESA) and County Communities on Transition (CCoT), including, information dissemination and participation in staff development activities. The Interagency Agreement also supports TIG. DVR START and TIG also collaborate to provide training regarding the Interagency Agreement.

DVR staff engages in student outreach by presenting at local conferences, schools, council meetings, and at various other organization meetings. The agreement calls for DPI, DVR, and DHS to share outcome data to determine the impact on outreach efforts

- (2) Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 C.F.R. § 361.22(b), provide, at a minimum, the following information about the agreement:
 - (A) Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational

agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;

WI DPI and DVR will provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities, including Pre-ETS. Consultation and technical assistance may be provided in person or through alternative means, such as email, webinars, conference calls, and video conferences.

- (B) Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under Section 614(d) of the Individuals with Disabilities Education Act;

WI DPI and DVR will work with Local Education Agencies (LEAs) and other state agencies to ensure a coordinated approach to the provision of transition services, including Pre-ETS, in accordance a student's IEP, IPE, identified needs, and any additional applicable service plan in place.

- (C) The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;

The roles and responsibilities and financial responsibilities for each agency are detailed in the interagency agreement as well as a conflict resolution process.

- (D) Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;

The interagency agreement between DVR and Department of Public Instruction (DPI) includes information about DVR's and the LEA's responsibilities to provide Pre-Employment Transition Services to students with disabilities ages 14-21. DVR has a liaison staff assigned to each public high school in Wisconsin. These staff develop strong relationships with staff at the schools they serve to ensure seamless identification of students with disabilities interested in Competitive Integrated Employment (CIE). These liaisons provide technical assistance and consultation, develop collaborative approaches for student outreach and referral for DVR services, and assist with transition planning and service provision that facilitates the student's transition from school to post-school employment. 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. Students are encouraged to apply for DVR services as early as appropriate during the transition planning process or at least two years prior to graduation.

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 staff 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 County Communities on Transition (CCoT) meetings.

The 2017 Wisconsin Act 178 CIE plan, first 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.

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.

- (E) Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

WI DPI and DVR developed options for coordinating documentation at the local level to satisfy the requirements set forth in Section 511 of the Rehabilitation Act regarding individuals with disabilities who are age 24 or younger and are seeking subminimum wage employment. Information can only be shared directly between LEA and DVR personnel with permission of the student and, if applicable, the student's parent or guardian.

- (F) Assurance that, in accordance with 34 C.F.R. § 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

Included in the interagency agreement under the Statewide State Educational Agency (State SEA) is the assurance under 34 C.F.R. § 397.31, that LEAs are not allowed to enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), to operate a program under which a youth with a disability is engaged in work compensated at a subminimum wage. WI DPI provided written notification to LEAs that such contracts with outside agencies are not permissible under Section 511 of the Rehabilitation Act.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

The WI Division of Vocational Rehabilitation (DVR) includes a Business Services Section under the Bureau of Management Services. The Section includes a Section Chief and 12 Business Services

Consultants (BSCs) who serve business customers in each WI workforce development area. The collective goal of the DVR BSCs is to develop and maintain relationships with business, learn about business's workforce needs, work together to create solutions, and inform business about DVR talent and services. BSC staff create local employer outreach plans based on the needs of the area as well as the types of jobs identified in consumer IPEs. DVR BSCs are members of Integrated Business Services Teams in their local regions. These teams include various workforce and community partners such as Veteran's Employment Services, job center, local Workforce Development Board, technical college, and corrections representatives. Business Services Teams collaborate to serve area business in a seamless and comprehensive manner. BSC staff have been integral members of local transition groups, Project SEARCH Business Advisory councils, Youth Apprenticeship consortiums/steering committees which are geared towards employment for students and youth with disabilities. BSC staff have also worked with employers to develop training and employment opportunities for students and adults served by DVR, e.g., Kwik Trip and Walgreen's partnerships. BSCs also provide services designed to increase awareness about disability and employment, accommodation solutions, and a variety of community and workforce partners resources. BSC staff have been trained on the Windmills curriculum, a disability awareness training series. BSCs offer this training to employers as a free educational opportunity which also promotes the hiring of people with disabilities.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are **not** carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

- (1) State programs (designate lead agencies) and implementing entities)) carried out under Section 4 of the Assistive Technology Act of 1998;

The lead agency for the Assistive Technology Act is the Wisconsin Department of Health Services which provides coordination and support for the Assistive Technology Council. DVR has a staff person that is appointed the Council. In addition, DVR has an Assistive Technology Statewide Team that provides a resource to DVR staff when providing assistive technology. DHS provides technical assistance to this team as needed.

- (2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

We have not engaged in collaborative discussions with programs carried out by the Under Secretary for Rural Development of the Department of Agriculture at the state level. DVR staff refer consumers at the local level as appropriate.

- (3) Non-educational agencies serving out-of-school youth;

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 been in collaborative discussions with the Wisconsin Department of Children and Families that administers the Foster Care program.

(4) State use contracting programs;

DVR has no formal agreement with Wisconsin State Use Program outlining cooperation with or utilization of services and facilities. There is a DVR staff person on the State Use Board, appointed by the Governor as required by State Statute.

(5) State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

DVR has an MOU with the Wisconsin Department of Health Services that includes the State Medicaid system. In addition, we have two separate Technical Assistance Guides for youth and adults. These guides are intended to improve communication, coordination, and services for youth and adults with disabilities seeking integrated employment who participate in either the Family Care, Family Care Partnership, PACE or IRIS long term care programs and who are jointly eligible for Division of Vocational Rehabilitation (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 integrated employment.

(6) State agency responsible for providing services for individuals with developmental disabilities;

DVR has an MOU with the Wisconsin Department of Health Services, the state agency that provides services for individuals with developmental disabilities. This MOU was discussed in (1)(5) above.

(7) State agency responsible for providing mental health services; and

DVR has an MOU with the Wisconsin Department of Health Services, the state agency that provides mental health services. This MOU was discussed in (1)(5) above. DVR also has an MOU with the Wisconsin Department of Health Services, Division of Care and Treatment Services, Bureau of Prevention and Recovery, that governs cooperative service delivery for Individual Placement and Support (IPS) in Wisconsin.

(8) Other Federal, State, and local agencies and programs outside the workforce development system.

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. 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

.
(9) Other private nonprofit organizations.
NA

DRAFT

VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

CERTIFICATIONS

States must provide written and signed certifications that:		Include
1.	The Wisconsin Division of Vocational Rehabilitation 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 title IV of WIOA, ⁵ and its State Plan supplement under title VI of the Rehabilitation Act;	Yes
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). 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 or the designated State unit when the designated State agency has a designated State unit) agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) 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;	Yes
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 or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, 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;	Yes
4.	The designated State unit, or if not applicable, the designated State agency 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, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);	Yes
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.	Yes

⁵ Public Law 113-128.

6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.	Yes
7.	The DVR Division Administrator 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;	Yes
8.	The DVR Bureau of Management Services Director has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;	Yes
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.	Yes

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:		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.	Yes
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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.	Yes
3.	Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.	Yes

	<ul style="list-style-type: none"> (b) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. (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. (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). (e) as applicable, 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. (f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act (h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (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. (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 as set forth in section 101(a)(18)(A) (m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act. 	
4.	<p>Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:</p> <ul style="list-style-type: none"> (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act. (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. (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 	Yes

	<p>apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.</p> <p>(d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.</p> <p>(e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.</p> <p>(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.</p> <p>(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.</p> <p>(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 sections 101(a)(14) and 511 of the Rehabilitation Act.</p> <p>(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.</p> <p>(j) with respect to students with disabilities, the State:</p> <ul style="list-style-type: none"> (i) has developed and will implement, <ul style="list-style-type: none"> (A) strategies to address the needs identified in the assessments; and (B) 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 (ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113). (iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services. 	
5.	Program Administration for the Supported Employment Title VI Supplement to the State plan:	Yes

	<p>(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.</p> <p>(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.</p>	
6.	<p>Financial Administration of the Supported Employment Program (Title VI):</p> <p>(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)(H) and (I) of the Rehabilitation Act.</p> <p>(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.</p>	Yes
7.	<p>Provision of Supported Employment Services:</p> <p>(a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that 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 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 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)(7)(C) and (E) of the Rehabilitation Act.</p>	Yes

APPENDIX 1: PERFORMANCE GOALS FOR THE CORE PROGRAMS

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

	Title I – Adult Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	76%		76%	
Employment (Fourth Quarter after Exit)	73%		73%	
Median Earnings (Second Quarter after Exit)	\$8,200		\$8,200	
Credential Attainment Rate	67%		67%	
Measurable Skill Gains	58%		58%	

	Title I – Dislocated Worker Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	80%		80%	
Employment (Fourth Quarter after Exit)	80%		80%	
Median Earnings (Second Quarter after Exit)	\$10,000		\$10,000	
Credential Attainment Rate	69%		69%	
Measurable Skill Gains	65%		65%	

	Title I – Youth Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) ⁶	76%		76%	
Employment (Fourth Quarter after Exit) ⁷	76%		76%	
Median Earnings (Second Quarter after Exit)	\$4,300		\$4,300	
Credential Attainment Rate	58%		58%	
Measurable Skill Gains	56%		56%	

⁶ For Title I Youth programs, employment, education or training.

⁷ For Title I Youth programs, employment, education or training.

	Title II – Adult Education and Family Literacy Act Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	43.60%		43.70%	
Employment (Fourth Quarter after Exit)	40.60%		40.70%	
Median Earnings (Second Quarter after Exit)	\$4,960.00		\$4,970.00	
Credential Attainment Rate	39.60%		39.70%	
Measurable Skill Gains	49.60%		49.70%	

	Wagner-Peyser Act Employment Service Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	68%		68%	
Employment (Fourth Quarter after Exit)	68%		68%	
Median Earnings (Second Quarter after Exit)	\$7,400		\$7,400	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	Vocational Rehabilitation Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	54%		55%	
Employment (Fourth Quarter after Exit)	53%		54%	
Median Earnings (Second Quarter after Exit)	\$3,500		\$3,600	
Credential Attainment Rate	36%		37%	
Measurable Skill Gains	55%		56%	

	All WIOA Core Programs			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers	Pilot	Pilot	Pilot	Pilot

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES PROGRAM (TANF)

TANF General Provisions

References to the State Statutes: Sections of this Plan include references to the Wisconsin Statutes. The statutes are available online at: <https://docs.legis.wisconsin.gov/statutes/prefaces/toc>

References to the Wisconsin Works (W-2) Manual: Sections of this Plan include references to the W-2 Manual. The W-2 Manual is published on the Wisconsin Department of Children and Families (DCF) website at:
<https://dcf.wisconsin.gov/manuals/w-2-manual/Production/default.htm>

References to the Emergency Assistance (EA) Manual: Sections of this Plan include references to the EA Manual. The EA Manual is published on the Wisconsin DCF website at:
https://dcf.wisconsin.gov/manuals/ea-manual/Production/EA_Manual.htm

References to the State Administrative Rules: This Plan includes references to the State Administrative Rules. The Administrative Rules are published online at:
https://docs.legis.wisconsin.gov/code/admin_code

Wisconsin provides several types of Temporary Assistance to Needy Families (TANF) programs, including the Wisconsin Works (W-2) program. The Department of Children and Families (DCF) administers Wisconsin's core TANF programs (W-2, other work programs, Kinship Care, and the Wisconsin Shares child care subsidy program) and is responsible for the TANF section of the WIOA Combined Plan. DCF works closely with the other state departments that also administer TANF programs and services, including the Wisconsin Department of Administration (DOA), Wisconsin Department of Health Services (DHS), Wisconsin Department of Public Instruction (DPI), and Wisconsin Department of Revenue (DOR).

STATES THAT INCLUDE TANF IN THE COMBINED STATE PLAN MUST OUTLINE HOW THE STATE WILL MEET THE REQUIREMENTS OF SECTION 402 OF THE SOCIAL SECURITY ACT INCLUDING HOW IT WILL:

- 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).

Since 1997 Wisconsin has administered W-2, a welfare-to-work program, for low-income families. W-2 is based on work participation and personal responsibility. The program provides employment preparation services, case management, supportive services, and cash assistance to eligible families.

W-2 Contracts for Calendar Years 2013 through 2024

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.

In 2018, DCF identified funding for BOS W-2 Contractors to fund a 1.0 full time equivalent for a W-2 Child Support Liaison position, responsible for creating direct communication, coordination, and cooperation between the W-2 agencies and the local Child Support agencies with the goal of ensuring that low-income noncustodial parents receive the services they need to find work and support their children. A W-2 Child Support Liaison position was added for the four W-2 Contractors in Milwaukee in 2019.

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;
- Equus Workforce Solutions 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.

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 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 \$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 200 percent of the statewide median value for homes, excluding the value of agricultural land owned by the W-2 group. DCF has established a hardship exemption to these asset restrictions by administrative rule in Wis. Admin. Code DCF 101.09(3m)(c). The hardship exemption allows agency workers to disregard any home valued at more than 200 percent of the statewide median home value if any of the following criteria are met:

- No member of the W-2 group has the legal right to sell the home, including for reasons such as the home is subject to pending litigation and the home is jointly owned with a person who is not in the Wisconsin Works group and who refuses to consent to the individual in the Wisconsin Works group selling his or her share;
- The individual had a recent sudden loss of income due to death, divorce, separation, or non-payment of support;
- The Wisconsin Works group includes an incapacitated group member; or
- The individual is or has been a victim of domestic abuse or is at risk of further domestic abuse, or the home is jointly owned with the abuser, and the abuser is not a member of the Wisconsin Works group.

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); Wis. Admin. Code DCF 101.09 (2),.
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 went into effect with the passage of administrative rule Wis. Admin. Code DCF 101.09(2)(n), which was implemented November 1, 2021.
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 which 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 healthcare. 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, healthcare professionals or other meetings approved by the FEP and necessary to prepare a participant for employment.
2. 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.
 3. 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.
 4. 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 placements are available to CPs and NCPs statewide as of 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.

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. CMJ placements are for unemployed individuals who are able to find and keep employment. The goal of the CMJ placement is to rapidly connect individuals who are job ready to employment. CMJ participants are generally assigned to employment search, career planning, and job readiness/motivation activities.
2. CMF placements support job retention for twelve (12) months for on-going W-2 participants who progress from a paid placement to unsubsidized employment. CMF activities encourage participants to stay employed and advance in their careers. Qualifying CMF placed participants may be eligible for a worker supplement, known as CMF+.
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. CMN placements are for NCPs of children whose CP is either participating in W-2 or receiving subsidized child care assistance. CMN activities may include employment search, job retention services, career advancement services, and education and training. A stipend may be paid to NCPs who are unemployed, participating in education and training in certain counties, and are not ready for a TEMP job.
5. CMM placements are for custodial minor parents. Case management services include providing individuals with information on family planning services, available child care services to enable the individual to complete school, employment and training services, and eligibility for other programs, including medical assistance and nutrition programs.
6. CMP placements are for pregnant women who do not have custody of any children. Activities include job search, child care related activities, and activities designed to reduce barriers to employment. Once the child is born, the participant may be eligible for the paid CMC placement, discussed above. CMPs typically transition to the CMC placement after the birth of the child.
7. CMD placements are for individuals who have reached their W-2 time limit and are no longer eligible for a W-2 paid placement. Activities include help to match the individual to employment,

to connect the individual and family to services in the community, and to reassess on a monthly basis whether the individual is eligible for an extension.

(See W-2 Manual Chapter 7.)

Time Limits

The maximum period of participation in a TEMP, CSJ, or W-2 T placement is limited to 24 months for each placement. Extensions of the 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 changed its maximum lifetime limit from 60 months for W-2 participation to 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 promulgated rules to define "hardship" and the criteria for the transition period, which was implemented November 1, 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 (15) percent for no fewer than (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 eight 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 rules 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), Job Access Loans (JAL), and Refugee Cash Assistance (RCA) to help eligible individuals and their families.

1. Contracted Child Care provides short-term child care at the W-2 agency locations or through contracted slots at a regulated child care provider to ensure children are in a quality child care setting while their parents are accessing services at the W-2 agency.
2. EA provides funding to families that meet all EA eligibility requirements including experiencing a current emergency due to homelessness, impending homelessness, energy crisis, fire, flood, or natural disaster. (See EA Manual.)
3. JALs are short-term, interest-free loans to meet immediate and discrete expenses related to obtaining or maintaining employment. (See W-2 Manual Chapter 17.)
4. RCA is a time-limited program for low income refugees who meet the financial eligibility standards of W-2 and meet the RCA program’s criteria for refugee status. A parallel assistance program is the Refugee Medical Assistance (RMA) program for those who do not meet Medicaid eligibility criteria. (See W-2 Manual Chapter 18.) Note: Wisconsin funds RCA with funding other than TANF or TANF Maintenance of Effort (MOE).

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 300 percent of the FPL. The applicable program description indicates when an alternate measure of neediness is used.

Wisconsin’s Other TANF Programs and Services

In addition to W-2 and the W-2 Related Programs described in this section, Wisconsin supports other TANF programs and services described below.

Note: In addition to the W-2 and the Related Programs described in this Plan, the below programs are anticipated to be funded with TANF and/or MOE funding during the plan period.

Wisconsin Shares

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. Starting in state fiscal year (SFY) 2025, provisions set 200 percent as the single initial eligibility and phase-out threshold for Wisconsin Shares subsidies.

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. Starting in SFY 2025, the family's copayment will increase by \$1.00 for every \$5.00 by which the family's gross income exceeds 200% FPL, increasing \$1 for every \$3. 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 implemented the phase-out period for continuing eligibility in 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 established a hardship exemption to the asset restrictions with Wis. Admin. Code DCF 101.09(3m)(c).

Child Welfare Prevention Services

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 through the Brighter Futures program. Brighter Futures supports positive youth development and prevention programs in high-risk communities and high-poverty neighborhoods. Additionally, DCF 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. Due to the COVID-19 pandemic, home visiting moved to a virtual platform and families continued to be served by the home visiting program. 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. Due to the COVID-19 pandemic, home visiting moved to a virtual platform and families continued to be served by the home visiting program. TANF funds are 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). 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund the Brighter Futures program.

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 five Milwaukee elementary schools chosen by the department. Wis. Stat. §49.175(1)(d). In the 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. 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund this program.

Homeless Case Management Services Grants

2017 Wisconsin Act 59 created the Homeless Case Management Services Grant Program that is administered by the DOA, Division of Energy, Housing and Community Resources. 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund this program. 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

The Wisconsin Department of Revenue (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. MOE is only claimed if state funds exceeding the 1995 level are used for the TANF-eligible refunds. 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 EITC. The state program is funded primarily with federal TANF funds but may be funded with state funds or co-mingled funds. The DOR follows the federal earned income credit which is in effect for Wisconsin purposes. Wisconsin did not adopt section 204(c) of Public Law 116-94 relating to the disaster area provision allowing certain taxpayers to use earned income from the preceding tax year to compute the current year federal earned income credit. Therefore, if this federal provision applies to any Wisconsin residents, they must recompute their federal earned income credit using Wisconsin's definition of the Internal Revenue Code to compute the Wisconsin earned income credit.

Educational Support Services to Needy Students

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 replaced the Student Achievement Guarantee in Education (SAGE) program, and only schools that previously participated in SAGE are permitted to participate in AGR. Under SAGE, DPI made grants to schools with a high percentage of low-income pupils which 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 expired at the end of the 2017-18 school year. Under AGR, schools 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.

In-Home Safety Services

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 2021, the program served 38 counties and five Tribes.

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. Starting in SFY 2025, the monthly rate increases from \$300 to \$375. (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 33 counties (Adams, Ashland, Barron, Bayfield, Brown, Burnett, Chippewa, Clark, Douglas, Dunn, Florence, Forest, Iron, Jackson, Juneau, Kenosha, Langlade, Marinette, Menominee, Oconto, Outagamie, Pierce, Polk, Price, Racine, Rock, Rusk, Sawyer, St. Croix, Taylor, Walworth, Washburn, and Winnebago) with a mix of rural and urban areas.

Wisconsin Community/Community-Building Milwaukee (CBM) Services Training Workshops

DCF contracts with Wisconsin Community Services (WCS) 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 helps to encourage the formation and maintenance of two-parent families by promoting 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.

As a result of the COVID-19 pandemic, WCS and the CBM continues to provide most work on a virtual platform. The effectiveness of converting to a virtual platform has allowed WCS to use Community Building workshop tools and principles to develop interpersonal communication programming and skills for TANF participants. WCS will be working with local W-2 agencies to provide extensive

(workforce) training with the focus on healing trauma, emotional health, and overall well-being. In addition, these skills will benefit the W-2 providers and the reduced programming efforts/needs that are provided to their participants. The workshops create an experience of safety, allowing participants to address unproductive attitudes and behaviors, and heal unresolved trauma and grief that may be driving current dysfunctional circumstances and compromised sustainable employment opportunities in our various communities and neighborhoods throughout Southeastern Wisconsin.

Fostering Futures; Connections Count

2015 Wisconsin Act 55 authorized a program under which DCF contracted with local organizations to employ trusted community members who 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. 2019 Wisconsin Act 9 and 2021 Wisconsin Act 58 continued to fund this program. Wis. Stat. §49.175(1)(n).

Adult Literacy Grants

DCF is authorized to award grants to qualified applicants to provide literacy training to TANF-eligible adults. Grant recipients are required to coordinate with W-2 agencies to ensure adequate adult literacy services are available to W-2 participants. DCF has contracted with Wisconsin Literacy, Inc. through June 30, 2025. If funding continues to be made available, the contract provides for a potential two-year renewal. Wis. Stat. §49.169.

GED Services

DCF is also authorized to use TANF funding to provide General Education Development testing and preparation services to assist TANF-eligible individuals (needy parents or pregnant women) to obtain General Equivalency Degrees (GEDs).

In the 2017-19 biennium, DCF combined the GED services funding with the Adult Literacy grant to Wisconsin Literacy, Inc., as the services are closely related. As part of the combined contract, this current TANF use is anticipated through June 30, 2025, with a potential two-year renewal. Wis. Stat. §49.175(1)(v).

Grants for Civil Legal Services

Current legislation provides funding for grants to the Wisconsin Trust Account Foundation, Inc. (WisTAF), a non-profit organization established by the Wisconsin Court System. The grants may not be used for litigation against the state and may only be used to support specific civil legal services (related to domestic abuse, sexual abuse, or restraining orders for certain at-risk elderly and disabled individuals) for otherwise TANF-eligible individuals with incomes under two hundred (200) percent FPL. This funding is also contingent on DCF review and approval of a plan to be developed by WisTAF for the use of the funds.

Skills Enhancement Grants

A program exclusively available to Wisconsin's community action agencies, the Skills Enhancement Program (SEP) provides financial assistance and supportive services to individuals who work at least 20 hours per week and whose earned income is at or below 150 percent FPL for education and training. The SEP focuses on increasing the earnings of working poor households by helping

participants acquire the skills needed to obtain higher paying jobs that offer healthcare benefits by emphasizing short-term, demand driven, job-focused post-secondary training. The program includes access to transportation, child care, career counseling, job placement assistance, and financial support. Historically funded at \$250,000 annually from state general purpose revenue, current legislation provides for an additional \$500,000 in TANF funding for each fiscal year of the 2023-2025 biennium.

DCF contracts with Wisconsin's community action agencies on an annual basis through an application process. Community action agencies undertake outreach, initial screening, processing of applications and enrolling clients into the program. Community action agencies further enhance the success of participants by providing comprehensive support services including but not limited to providing labor market information and individualized training plans, case management, providing assistance with enrolling in approved training, referral and job search assistance. The community action agencies must ensure that the SEP meets all of the program's performance benchmarks and obtain the documentation to support the outcomes they report to DCF. Wis. Stat. s. 9.265(3)(b)11

Jobs for America's Graduates

Students need more than a diploma to be successful, especially students facing challenges like poverty, trauma, and other situations that put them at risk of learning loss and disconnection. Jobs for America's Graduates (JAG) improves social, academic, and employment skills of youth who are eligible to receive TANF in an in-school program that provides the support, connections, and training these students need to transition to adulthood. Students who take part in this program have multiple barriers that traditionally prevent students from graduating high school on time. This program is designed to specifically address those barriers. Graduating participants in this program receive 12 months of follow-up services to ensure they are successfully transitioning into employment, post-secondary education, or the military. Foundations of JAG include:

- Project Based Learning
- Employer Engagement
- Trauma Informed Care

Current legislation provides \$500,000 in TANF funding annually to expand participation in the JAG program. This additional \$500,000 results in \$1 million in total funding. Wis. Stat. s. 49.175 (1)(LM).

Wisconsin's Non-TANF Programs and Services

In addition to Wisconsin's other TANF programs and services, DCF supports a number of non-TANF programs and services, described below, that assist needy families and children.

Note: Some of these programs and services are identified as part of the state's annual determination of TANF MOE while other programs and services may not be counted for TANF MOE based on specific requirements of TANF MOE. Programs and services supported by state funding which are not identified in other sections of this Plan are described below

Substance-Abuse Screening and Testing for Work Experience Programs

2015 Wisconsin Act 55 created a program under which NCPs eligible for services (including a TEMP placement) under W-2, all applicants for the TMJ or TJ programs (described in this plan), and all NCPs ordered by a court to participate in the Children First work-experience and job-training program (also described in this plan) are required to complete a controlled-substance abuse screening questionnaire. If, on the basis of answers to the questionnaire, the administering agency determines

there is a reasonable suspicion that the individual is abusing a controlled substance, the individual must undergo a drug test. Individuals who test positive for a controlled substance without evidence of a valid prescription are required to participate in a treatment program in order to remain eligible for W-2 NCP services, TMJ, TJ, or Children First. DCF is required to pay or reimburse its contractors for testing and treatment costs that are not covered by Medical Assistance (MA) or insurance in effect covering the individual. 2017 Wisconsin Act 195 also created the “Hire Heroes” program, a transitional jobs program for veterans, administered by Wisconsin’s Department of Workforce Development (DWD), under which the screening, testing, and treatment requirements also apply to program applicants and participants. Wis. Stat. §49.162

Under provisions of 2017 Wisconsin Act 59, Wisconsin is expanding the required substance abuse screening, testing, and treatment as a condition of eligibility 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.

2017 Wisconsin Act 59 also replaces the current requirement for screening via a questionnaire with "controlled substance abuse screening," which would mean a questionnaire, a criminal background check, or any other controlled substance abuse screening method identified in administrative rule. DCF is required to promulgate administrative rule to implement the expansion to W-2 and screening changes.

DCF must use state funds to cover abuse screening, testing, and treatment costs that are not otherwise covered by medical assistance, private insurance, or another type of coverage. This program is included as a potential MOE expenditure to the extent that the expenditures are associated with eligible families as defined in this Plan.

Child Support Pass-Through

DCF administers the Child Support program. Cooperation with the child support agency is a requirement for receipt of W-2 services. The family’s income from child support does not affect financial eligibility for W-2 or W-2 payments. Seventy-five (75) percent of payments for current support are passed-through to the families. Seventy-five (75) percent of payments for past-due support during W-2 participation time periods and one hundred (100) percent of payments for past-due support for time periods without W-2 participation are passed-through to the families. (See W-2 Manual Chapters 3 and 15.)

Children First

DCF administers the Children First program, which provides employment and training services for non-custodial parents (NCPs) who are ordered by a court to participate in the program to promote their ability to pay child support and increase their involvement in the lives of their children. An NCP who meets all of the eligibility requirements for Children First and W-2 NCP services may receive both Children First and W-2 services at the same time. Some local agencies may also co-enroll Children First participants in the Food Share Employment and Training Program (FSET), which provides additional transportation and training resources. (See W-2 Manual Chapter 7.)

Case Management Follow-Up Plus (CMF+)

2017 Wisconsin Act 59 established authority for DCF to provide a worker supplement to W-2 participants that obtain unsubsidized employment and meet federal work participation requirements. These CMF+ supplemental payments are assistance provided as a separate state program with state

funds to promote work. For that reason, receipt of a supplemental payment does not count toward a participant's state or federal 60-month TANF time limit and the participant's child support payments are not assigned to the state. The purpose of providing supplemental payments is to assist W-2 participants who become employed and stop receiving federally-funded assistance to transition into stable unsubsidized employment. Supplemental payments serve as an additional support for eligible families to retain employment and participate in services that may improve employment, and CMF+ allows W-2 participants who transitioned to the workforce to be included in Wisconsin's work participation rate calculations.

As of June 23, 2018, W-2 participants who gained unsubsidized employment and met minimum work participation requirements are eligible to receive a monthly \$50 supplemental payment in addition to case management follow-up services. Qualifying CMF placed W-2 participants may be eligible for the worker supplement, known as CMF+. CMF participants are W-2 participants who obtain employment while receiving W-2 services and assistance. The CMF placement makes them eligible to receive ongoing case management services for up to 12 months. CMF+ includes the same ongoing case management services as CMF, plus the \$50 supplemental payment for up to 12 months as long as participants maintain employment that continues to meet work participation requirements and meet W-2 program eligibility requirements. (See W-2 Manual Chapter 7.)

Domestic Violence Services

DCF administers state and federal funds to provide grants for domestic violence services in each county and tribal area in Wisconsin. The goals of the grant program are to: 1) provide crisis, safety, and support services for victims of domestic abuse and their children; 2) educate the community about issues related to domestic abuse; and 3) promote a coordinated community response to domestic abuse. DCF provides funding to End Domestic Abuse Wisconsin to provide training and technical assistance to domestic abuse programs and other systems. Wisconsin claims for MOE only the portion of the state-funded expenditures that are reasonably allocable to eligible families defined as at or below three hundred (300) percent of the FPL.

Burial Services

DHS administers the Wisconsin Funeral and Cemetery Aids Program (WFCAP) in Wisconsin, an assistance program to service providers who offer funeral, cremation, and cemetery services to certain decedents whose services are not fully compensated by the decedent's estate, family, or other resources. DHS reimburses funeral and/or cemetery expenses of a person who was eligible for TANF or MA services. DHS pays funeral and cemetery expenses for eligible families with state funding, which Wisconsin reports as an MOE expenditure. (See W-2 Manual Chapter 19.)

Milwaukee County Alcohol and Other Drug Abuse Services

DHS contracts for the provision of Alcohol and Other Drug Abuse (AODA) services to serve the TANF population in Milwaukee County at or below two hundred (200) percent of the FPL. Special target populations include: pregnant women; specialized minority treatment agencies including tribal agencies; intravenous drug users; correctional clients; and child welfare related service populations. DHS awarded grants for providing new or expanded community-based AODA treatment programs that meet the special needs of TANF eligible individuals based on the program's ability to emphasize parent education, vocational and housing assistance, and coordination with other community programs and with treatment under intensive care.

Emergency Homeless Shelters

Wisconsin provides state funding to a homeless shelter located in the Fox River Valley section of the state. The purpose of the funding is to assist eligible families under two hundred (200) percent of the FPL with services and shelter in order to achieve stability during severe financial hardship. Note: Wisconsin funds other family shelters in the state with federal housing funds.

Home-Visiting Programs

DCF, in collaboration with DHS, administers comprehensive home-visiting programs to expand the in-home services to needy families. These services for families at-risk focus on: improving birth outcomes; supporting maternal and child health; enhancing family functioning; promoting safety and development; and preventing child abuse and neglect.

B. REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE UNDER THE PROGRAM TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THAT THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE THE PARENT OR CARETAKER 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 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 healthcare, 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 Education and Training

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 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 40 hours per week of assigned activities, up to 10 hours per week may be in education and training activities. For W-2 T participants, within the up to 40 hours per week of assigned activities, up to 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 beginning on 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>

In accordance with work requirements under 42 U.S.C. 602(a)(1)(B)(iv) and consistent with the exception provided in section 607(e)(2), Wisconsin requires W-2 participants not exempt from work requirements due to temporary incapacitation to engage in work activities beginning the first month of assistance. Section VII(b) above addresses Wisconsin's requirements for a parent or caretaker receiving assistance under the program to engage in work.

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 through 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. PREVENTION AND REDUCTION OF OUT-OF-WEDLOCK AND ADOLESCENT PREGNANCIES ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(IV) 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 healthcare providers which is available to all customers.

Boys and Girls Club

DCF provides grants to Boys and Girls Clubs (BGC) to operate two programs in Wisconsin. TANF funds from DCF are used to fund the Wisconsin After 3 program, and the BE GREAT: Graduate program. Funds are provided to the Boys and Girls Club of Fox Valley (BGCFV), who acts as the fiscal agent, and distributes funding to other clubs providing programs throughout the state.

Wisconsin After 3

Boys and Girls Club provides a program to support afterschool programming focused on improving fluency in reading and math and career preparation for low-income youth. Services provided through this program are the Stride Online Learning Academy, NBA Math Hoops, Power Hour/Homework Help, and Career Launch. These services focus on study habits, intensive tutoring in math and English, and exposure to career options and role models.

BE GREAT: Graduate

BGC provides the BE GREAT: Graduate afterschool program focused on increasing academic achievement, school engagement, and college and career readiness among low-income youth identified as being at risk of dropping out of high school.

BE GREAT: Graduate follows the evidence-based Check and Connect program model, which links each student with a Graduation Coach to provide weekly interactions with a positive adult and includes intentional efforts to establish a connection between each student's school, parents, and BGC.

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, and tribes. These grants, which fund programs for the prevention of non-marital pregnancy, youth violence, substance use and abuse, and child abuse and neglect, and the promotion of 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. The agencies establish their goals and performance metrics based on the evidence-based curriculum and strategies utilized in the program.

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/statehealthplan/index.htm>

Medicaid Family Planning Services

DHS administers Family Planning Only Services, which is a Medicaid-funded program for persons aged 15 years and older who:

1. Have income that does not exceed three hundred and six (306) percent of the FPL; and
2. Are not enrolled in full benefit coverage from Medicaid or BadgerCare, Wisconsin's health services for low-income families.

The Medicaid Family Planning Services provides selected family-planning services, including free contraceptive services and supplies, routine preventative primary services that are family-planning related, tests for abnormal cervical cells (Pap tests), and tests and treatment for sexually transmitted diseases and voluntary sterilizations for women and men 21 years or older.

F. PREVENTION OF STATUTORY RAPE AND OTHER SEXUAL ASSAULT 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 IN SCOPE TO INCLUDE MEN.

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. PREVENTION OF ACCESS TO ASSISTANCE IN ELECTRONIC FUND TRANSACTIONS 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. ACCESS TO ASSISTANCE WITH NO OR MINIMAL FEES/CHARGE 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 **(g)** 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. RESIDENCE. INDICATE WHETHER THE STATE INTENDS TO TREAT FAMILIES MOVING INTO THE STATE FROM ANOTHER STATE DIFFERENTLY THAN 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. CITIZENS AND NON-CITIZENS INDICATE WHETHER THE STATE INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS AND IF SO, INCLUDE AN OVERVIEW OF SUCH 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.) However, under the Wilson Fish TANF Coordination program, DCF's W-2 Refugee Programs Liaison provides ongoing case management, including adapting and facilitating access to employment and training services and support for eligible refugees receiving W-2 cash assistance in order to promote self-sufficiency and integration. The Liaison partners with W-2 agency FEPs to conduct initial eligibility assessments, intake appointments, and needs assessments for each member of a refugee family.

K. FAIR AND EQUITABLE TREATMENT 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.)

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.)

Due to the variety and needs of each of the TANF programs in this section, 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. ELDER CARE. 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 healthcare 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 healthcare 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 healthcare 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 healthcare 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. MOE-FUNDED SERVICES 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).

See Section VII(a) of this Plan.

TANF CERTIFICATIONS

Wisconsin will operate a program to provide TANF: so that children may be cared for in their own homes or in the homes of relatives; to end dependence of needy parents on government benefits by promoting job preparation, work, and marriage; to prevent and reduce the incidence of "out-of-wedlock" pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and to encourage the formation and maintenance of two-parent families. This program generally is known as Wisconsin Works (W-2).

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

1. Wisconsin's TANF Program

Specify which state agency will administer and supervise the program in part (a) in all political subdivisions of the State:

DCF administers and supervises the program in all political subdivisions of the State;

2. Child Support

Operate a child support enforcement program under the State plan approved under part D (section 402(a)(2) of the Social Security Act);

3. Foster Care and Adoption Assistance

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 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);

4. Administration

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 private sector organizations (section 402(a)(4) of the Social Security Act)—

- (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
- (B) have had at least 45 days to submit comments on the plan and the design of such services;

5. Equitable Access

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);

6. Program Fraud and Abuse

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);

7. Domestic Violence (42 U.S.C. 602(a)(7)) Optional Certification

[x] The State has established and is enforcing standards and procedures to:

- Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
- Refer such individuals to counseling and supportive services; and
- Waive, pursuant to a determination of good cause, other program requirements such as time limits (for as 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.

Wisconsin TANF Certification Requirement from the Consolidated Appropriations Act of 2022

CERTIFICATION THAT THE STATE WILL PROVIDE INFORMATION TO VICTIMS OF SEXUAL HARASSMENT OR SURVIVORS OF DOMESTIC VIOLENCE, SEXUAL ASSAULT, OR STALKING (Section 402 (a)(8) of the Social Security Act):

(A) In general. A certification by the chief executive officer of the State that the State has established and is enforcing standards and procedures to:

- (i) ensure the applicants and potential applicants for assistance under the State program funded under this part are notified of assistance made available by the State to victims of sexual harassment and survivors of domestic violence, sexual assault, or stalking;
- (ii) ensure that case workers and other agency personnel responsible for administering the State program funded under this part are trained in:
 - a. the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking;
 - b. state standards and procedures relating to the prevention of, and assistance for, individuals who are victims of sexual harassment, or survivors of domestic violence, sexual assault, or stalking; and
 - c. methods of ascertaining and ensuring confidentiality of personal information and documentation related to applicants for assistance and their children who provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking;
- (iii) ensure that, if a State has elected to establish and enforce standards and procedures regarding the screening for, identification of, domestic violence, sexual assault, or stalking pursuant to paragraph (7):
 - a. the State program under this part provides information about the options under this part to current and potential beneficiaries and;
 - b. case workers and other agency personnel responsible for administering the State program funded under this part provided with training regarding State standards and procedures pursuant to paragraph (7).

Wisconsin helps families with low-incomes achieve self-sufficiency through the Wisconsin Works (W-2) program. All W-2 applicants receive written information about domestic violence which describes the resources and protections available to applicants and participants who are the survivors of domestic violence. Posters with similar information are posted in common areas of all W-2 agencies. In 2023, language will be added to the written information to address sexual harassment, sexual assault, and stalking.

The Wisconsin Works Programs (WWP) Informal Assessment includes a screening section that assesses participants for domestic violence, sexual assault, and stalking. The screener is offered to every W-2 participant prior to the initial W-2 placement. W-2 agency workers provide supportive resources to survivors of domestic violence based on the results of the screener. Participants may decline to answer without risk of sanction or case closure. The screener is offered again at six-month intervals until completed or until the participant is no longer in a W-2 placement. The participant may also request to revisit the screener at any time. Agency workers explain how participant information will be kept confidential. Wisconsin exempts survivors of domestic violence from child support cooperation requirements.

All agency workers who directly work with applicants and participants must take a state designed and delivered training that covers the nature and dynamics of domestic violence. The topics of sexual harassment, sexual assault and stalking will be added to this training and an updated course will be ready by January 1, 2024. W-2 agencies must work closely with individuals for whom domestic violence is an issue to ensure that these individuals are receiving appropriate services. Workers should explain to participants the good cause exemption from program rules, available resources, and finding support to overcome the barriers they face. Additionally, survivors of domestic violence may receive a time-limit extension if there is an identified need to continue receiving W-2 services.

45-day Public Comment Period

This WIOA State Combined Plan TANF Section was available for public comment for 45 calendar days, January 12, 2024 – February 27, 2024.

Certified by the designee of the Chief Executive Officer of the State of Wisconsin:

Emilie Amundson
Secretary, Wisconsin Department of Children and Families

Date

DRAFT

TANF GLOSSARY OF ACRONYMS

AODA	Alcohol and Other Drug Abuse
ARP	At Risk Pregnancy
BOS	Balance of State
BMCW	Bureau of Milwaukee Child Welfare
CMC	Custodial Parent of an Infant
CMD	Case Management Denied
CMF	Case Management Follow-Up
CMF+	Case Management Follow-Up Plus
CMJ	Case Management for Job Ready Individuals
CMM	Case Management for Minor Parents
CMN	Case Management for Non-custodial Parents
CMP	Case Management for Pregnant Women
CMU	Case Management for Unsubsidized Employment
CNA	Certified Nursing Assistant
CPS	Child Protective Services
CSA	Child Support Agency
CSJ	Community Service Job
CTS	SSI Caretaker Supplement
DOA	Department of Administration
DMCPS	Division of Milwaukee Child Protective Services
DCF	Department of Children and Families
DHS	Department of Health Services
DOJ	Department of Justice
DPI	Department of Public Instructions
DOR	Department of Revenue
EA	Emergency Assistance
EP	Employability Plan
FPL	Federal Poverty Level
FEP	Financial and Employability Planner
IPV	Intentional Program Violation
JAL	Job Access Loan
MOE	Maintenance of Effort
MPCP	Milwaukee Parental Choice Program
NCP	Non-Custodial Parent
PPSCP	Parental Private School Choice Program
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996
SMART	Skills Mastery and Resistance Training
SSDI	Social Security Disability Insurance

SAGE	Student Achievement Guarantee in Education
SSI	Supplemental Security Income
TANF	Temporary Assistance for Needy Families
TEMP	Trial Employment Match Program
TJ	Transitional Jobs
TMJ	Transform Milwaukee Jobs
W-2	Wisconsin Works
W-2 T	W-2 Transition
WCASA	Wisconsin Coalition Against Sexual Assault
WFCAP	Wisconsin Funeral and Cemetery Aids Program
WISH	Wisconsin Interactive Statistics on Health
YRBS	Youth Risk Behavior Survey

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM, EMPLOYMENT AND TRAINING (SNAP E & T) and WORK PROGRAMS AUTHORIZED UNDER SECTIONS 6(d)(4) and 6 6(o) OF THE FOOD AND NUTRITION ACT OF 2008

A. GENERAL REQUIREMENTS

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. IF A STATE AGENCY PLANS TO OFFER SUPERVISED JOB SEARCH IN ACCORDANCE WITH PARAGRAPH (E)(2)(I) OF THIS SECTION, THE STATE AGENCY MUST ALSO INCLUDE IN THE E&T PLAN A SUMMARY OF THE STATE GUIDELINES IMPLEMENTING SUPERVISED JOB SEARCH. THIS SUMMARY OF THE STATE GUIDELINES, AT A MINIMUM, MUST DESCRIBE: THE CRITERIA USED BY THE STATE AGENCY TO APPROVE LOCATIONS FOR SUPERVISED JOB SEARCH, AN EXPLANATION OF WHY THOSE CRITERIA WERE CHOSEN, AND HOW THE SUPERVISED JOB SEARCH COMPONENT MEETS THE REQUIREMENTS TO DIRECTLY SUPERVISE THE ACTIVITIES OF PARTICIPANTS AND TRACK THE TIMING AND ACTIVITIES OF PARTICIPANTS;

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; Educational Programs ; Work Experience*)

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. Job Search Training 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.

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	8	\$18,618	All E&T regional vendors in WI.	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 supervised job 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, if available, and public libraries based on what is available in the region. 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 management is an integral part of all 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:

- Employability Assessments
- Assistance with applications and resume development
- Local labor market information
- Job leads and job referrals
- Job development and job placement, as needed
- Working directly with employers and establishing relationships to advocate for FSET participants

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	631	\$875,028	All regional E&T providers	Number and percent of total supervised job search 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. 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	287	\$48,146	All regional E&T providers	Number of individuals who actively complete 90 days of job retention and are employed 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
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Statewide	ABAWDS and non-ABAWDS	6	\$27,930	Regional providers and Tribal Agencies	Number and percent of total self-employment training participants who obtained unsubsidized employment within the reporting period
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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	<1	\$1,848	Regional providers and Tribal Agencies	Number and percent of total workfare participants who obtained unsubsidized employment within the reporting period

Educational Programs

Basic/Foundational Skills Instruction

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, General Education Development, High School Equivalency, Job Readiness/Motivation, Job Skills Training Program, Language/Literacy, and Driver's Education when directly tied to employment.

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	328	\$866,917	All regional E&T	Number and

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
	non-ABAWDS			providers	percent of total education participants who obtained unsubsidized employment within the reporting period

Career/Technical Education Programs or other Vocational Training

Description: All activities within the education component are qualifying activities. The Career/Technical Education Program component includes the Credential or Certificate Receiving Program activity. Career/technical education is short-term competency based, with a hands-on experience emphasis and a quantifiable measurement of success. The measurements of success will vary depending on the career/technical education program.

Level of Participant Effort: This activity varies locally according to the length of appropriate and available courses and programs.

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	100	\$541,301	All E&T Regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period

English Language Acquisition

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 Language/Literacy.

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	15	\$30,735	All E&T Regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period

Work Readiness Training

Description: Work readiness training is intended for FSET participants exploring their career interests and advancement opportunities.

Activities within the work readiness training component are qualifying activities and include career planning.

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	407	\$888,524	All E&T regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period

Integrated Education and Training/Bridge Programs

Description: This will be new as a unique component in FSET. Bridge programs can vary depending on the population served. Bridge programs are offered to upper-level students in high school soon to be entering their first year of college. Bridge programs are also transitional programs for students who typically hold a two-year college degree and seek to obtain a four-year or graduate degree.

Level of Participant Effort: The criteria for participation in this component will vary greatly by the bridge program activity that is assigned. For example, if a nursing bridge program is offered, case managers will research the skills, knowledge, and experience necessary to participate in the nursing bridge program. If a participant does not meet the standards for the program, the FSET case manager will assign the participant to other activities to gain the required skills for the nursing program.

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	9	\$18,618	All E& T regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period
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Work Experience

Work Activity

Description: Work activity provides an individual with an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain employment and is performed in exchange for SNAP benefits. The purpose of work activity is to improve the employability of those who cannot find unsubsidized full-time employment.

Level of Participant Effort: This activity varies depending on the individual’s household FoodShare allotment. Work activity involves working off the household benefit, therefore it is not possible for an individual to volunteer for additional hours of work activity beyond the number of hours equal to the household's allotment for that month divided by the higher of the applicable federal or State minimum wage. Work activity ends when the household benefit has been worked off, but this would not be sufficient for an ABAWD to meet the ABAWD work requirement. If an ABAWD does work activity for their benefit divided by the minimum wage and it is, for example, only 6 hours a week, then the ABAWD must find 14 additional hours per week of work or a different qualifying activity.

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	\$5,782	All E&T Regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period

Internship

Description: The internship component is for participants seeking short- term work experience to get entry-level exposure to a particular industry or field. It is as much of a learning experience as it is work. Ideally, interns spend their time working on relevant projects, learning about the field, making industry connections, and developing both hard and soft skills. Internships sometimes even lead to full-time job offers.

Level of Participant Effort: This activity varies depending on the industry or field.

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	1	\$2,800	All E&T Regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period

Pre-Apprenticeship

Description: Pre-Apprenticeship is an opportunity to help E&T participants gain the necessary skills for an apprenticeship. These programs can play a valuable role in preparing E&T participants for a career, while contributing to the development of a diverse and skilled workforce. After completing the program, participants can visit our Registered Apprenticeship page and put their new skills to action.

Level of Participant Effort: This activity varies locally according to the length of appropriate and available courses and programs. Numerous pre-apprenticeships and apprenticeships exist across the state of WI that are available to FSET participants. Many apprenticeship and pre-apprenticeship programs are offered through the Wisconsin Technical College System. Program information and criteria for participation can be found online or contacting the college directly.

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
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Statewide	ABAWDS and non-ABAWDS	<1	N/A - Included in the cost of apprenticeship	All E&T Regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period
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Apprenticeship

Description: Apprenticeships offer numerous benefits to both employers and jobseekers. Apprenticeship is post-secondary education like a college or university. But apprentices learn only a portion of their skills in a traditional classroom. They receive most of their training on-the-job, while working for an employer who pays a good wage. The employment is the primary requirement for an apprenticeship - a job must exist for the apprentice to be trained.

Level of Participant Effort: This activity varies locally according to the length of appropriate and available courses and programs. Numerous pre-apprenticeships and apprenticeships exist across the state of WI that are available to FSET participants. Many apprenticeship and pre-apprenticeship programs are offered through the Wisconsin Technical College System. Program information and criteria for participation can be found online or contacting the college directly.

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	1	\$2,128	All E&T Regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period

On-the-job Training

Description: The on-the-job-training component is delivered while an FSET participant is performing tasks or processes related to their particular occupation. The FSET participant typically performs tasks

that are essential to their job function with the supervision of a manager, coach, or mentor. This type of training is typically used to broaden an employee’s skill set and to increase productivity.

Level of Participant Effort: The length of time spent in this component varies depending upon the employment sector. 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	1	\$4,083	All regional providers	Number and percent of total OJT participants who obtained unsubsidized employment within the reporting period

Transitional Jobs

Description: Transitional Jobs programs are government-sponsored employment programs where the state subsidizes short- term work opportunities – which can include placement and training as well as pay – to previously unemployed individuals in either the public, private, or non-profit sectors.

Level of Participant Effort: This activity varies locally according to the length of appropriate and available transitional jobs programs.

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	<1	\$1,400	All E&T Regional providers	Number and percent of total education participants who obtained unsubsidized employment within the reporting period

Other – Trial Employment Match Program

Description: Trial Employment Match Program (TEMP) is a W-2 employment position that provides subsidized work for applicants or ongoing W-2 participants. 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.

Level of Participant Effort: A TEMP job can last for a maximum of six months with an opportunity for a three-month extension. (See 7.3.5.1.2) A custodial parent may take part in more than one TEMP job, but may not exceed a total of 24 months of participation in TEMP. (See 7.3.6)

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;

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 FFY2024. The following is the Operating Budget for FFY2024. Wisconsin’s FSET operating budget does not meet the criteria to require itemization of 50% Federal reimbursement costs.

	State cost	Federal cost	Total
I. Direct Costs:			
a) Salary/Wages	\$0	\$697,231	\$697,231
b) Fringe Benefits* Approved Fringe Benefit Rate Used 43.94 %	\$0	\$0	\$0
c) Contractual Costs (Admin Only)	\$18,149,518	\$18,897,500	\$37,047,018
d) Non-capital Equipment and Supplies	\$0	\$237,500	\$237,500
e) Materials			
f) Travel	\$0	\$61,667	\$61,667
g) Building/Space	\$0	\$0	\$0

h) Equipment & Other Capital Expenditures	\$0	\$0	\$0
Total Direct Costs	\$18,149,518	\$18,897,500	\$37,047,018
II. Indirect Costs:			
Indirect Costs*Approved Indirect Cost Rate Used: 6.73%	\$0	\$87,355	\$87,355
III. In-kind Contribution			
State in-kind contribution	\$0	\$0	\$0
Total Administrative Cost (Total of items I, II, and III)	\$18,149,518	\$18,897,500	\$37,047,018
100 Percent Federal E&T Grant		\$1,937,920	\$1,937,920
100 Percent Federal Pledge Funding		TBD	0TBD
50 percent Additional Administrative Expenditure	\$18,149,518	\$18,331,568	\$36,481,086
IV. Participant Reimbursement (State plus Federal):			
a) Dependent Care (including contractual costs)	\$374,899	\$374,899	\$749,798
b) Transportation & Other Costs (including contractual costs)	\$1,774,121	\$1,831,825	\$3,605,946
c) State Agency Cost for Dependent Care Services	\$0		\$0
Total 50 percent Participant Reimbursement Expenses	\$2,149,020	\$2,206,724	\$4,355,744
V. Total Costs	\$20,298,538	\$22,476,212	\$42,774,750

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

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;

FSET 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;

8,300

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

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, Self-Employment Training, Basic/Foundational Skills Instruction, Career/Technical Education Program, English Language Acquisition, Integrated Training or Bridge Program, Work Readiness Training, Workfare, Work Experience, Work Activity, Work-based learning - Internship, Work-based learning - On-the-job Training, Work-based learning, Pre-apprenticeship/Apprenticeship, Work based learning - Transitional Employment, and Work-based learning- Other (Trial Employment Match Program- TEMP), and Job Retention. Case Management must be offered to all E&T participants engaged in one of the components listed..(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.

FoodShare IM agencies work register all FoodShare members who are not exempt from the FoodShare basic work rules 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

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;

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.

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	<ul style="list-style-type: none"> • Update the “Work Requirement Met” field indicating the prior month’s participation.
2nd Saturday of the month	<ul style="list-style-type: none"> • Update the “Anticipated to Meet Work Requirement” field. • CARES Worker Web (CWW) pulls information from the “Work Requirement Met” field and uses it to update the FoodShare clock.
Adverse Action	<ul style="list-style-type: none"> • 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 FY2024 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 Band of Lake Superior Chippewa, Menominee Indian Tribe, Oneida Nation, Forest County Potawatomi Community, Red Cliff Band of Lake Superior Chippewa, Sokaogon Chippewa Community, 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 bi-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.

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 Band of Lake Superior Chippewa, Menominee Indian Tribe, Oneida Nation, Forest County Potawatomi Community, Red Cliff Band of Lake Superior Chippewa, Sokaogon Chippewa Community, 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 budgeted amounts reflect current dependent care spending trends. FSET providers can request additional reimbursement funds, if needed, throughout the year. The current statewide budget totals \$749,798 for childcare reimbursements.

Wisconsin's FY2024 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 Band of Lake Superior Chippewa, Menominee Indian Tribe, Oneida Nation, Forest County Potawatomi Community, Red Cliff Band of Lake Superior Chippewa, Sokaogon Chippewa Community, 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 \$4,355,744 for participant reimbursements.

Wisconsin's FY2024 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		Only if required for FSET participation and no other transportation option is available.
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.

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			Includes reimbursement for gas when it is reasonable and necessary for the participant to rely on someone else to provide transport to and from assigned FSET activities.
Incentives			X	Supportive services must be both reasonable and necessary for FSET participation. FSET workers cannot provide supportive services as incentives or rewards for enrollment or participation in FSET under any circumstances.
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.
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 component or employment as a part of job retention.

18. FOR EACH COMPONENT THAT IS EXPECTED TO INCLUDE 100 OR MORE PARTICIPANTS, REPORTING MEASURES THAT THE STATE WILL COLLECT AND INCLUDE IN THE ANNUAL REPORT IN PARAGRAPH (C)(17) OF THIS SECTION. SUCH MEASURES MAY INCLUDE:

A. THE PERCENTAGE AND NUMBER OF PROGRAM PARTICIPANTS WHO RECEIVED E&T SERVICES AND ARE IN UNSUBSIDIZED EMPLOYMENT SUBSEQUENT TO THE RECEIPT OF THOSE SERVICES;

Reporting Measure	Data Source and Time Period	Value	Numerator	Denominator
1. Unsubsidized employment in 2 nd quarter after completion of participation in E&T	E&T Completers, FFY2021 Q1+Q2+Q3+Q4	58.67%	5,702	9,718
3. Unsubsidized employment in 4 th quarter after completion of participation in E&T	E&T Completers, FFY2020 Q3+Q4, FFY2021 Q1+Q2	54.34%	5,271	9,700

This measure is employment after completion of FSET, either 6 months or 12 months after completion. The denominator is FSET participants. If the denominator needs to be all FoodShare recipients, more research must be done.

B. THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO OBTAIN A RECOGNIZED CREDENTIAL, A REGISTERED APPRENTICESHIP, OR A REGULAR SECONDARY SCHOOL DIPLOMA (OR ITS RECOGNIZED EQUIVALENT), WHILE PARTICIPATING IN, OR WITHIN 1 YEAR AFTER RECEIVING E&T SERVICES;

This data is not readily available with any current data sources.

C. THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO ARE IN AN EDUCATION OR TRAINING PROGRAM THAT IS INTENDED TO LEAD TO A RECOGNIZED CREDENTIAL, A REGISTERED

APPRENTICESHIP AN ON-THE-JOB TRAINING PROGRAM, A REGULAR SECONDARY SCHOOL DIPLOMA (OR ITS RECOGNIZED EQUIVALENT), OR UNSUBSIDIZED EMPLOYMENT;

This data is not readily available, but could be provided using existing data sources.

D. MEASURES DEVELOPED TO ASSESS THE SKILLS ACQUISITION OF E&T PROGRAM PARTICIPANTS THAT REFLECT THE GOALS OF THE SPECIFIC COMPONENTS INCLUDING THE PERCENTAGE AND NUMBER OF PARTICIPANTS WHO ARE MEETING PROGRAM REQUIREMENTS OR ARE GAINING SKILLS LIKELY TO LEAD TO EMPLOYMENT; AND

This data request being assessed.

OTHER INDICATORS APPROVED BY FNS IN THE E&T STATE PLAN.

B. ABLE BODIED ADULTS WITHOUT DEPENDENTS (ABAWD)

A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs) subject to the 3- month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA

1. ITS PLEDGE TO OFFER A QUALIFYING ACTIVITY TO ALL AT-RISK ABAWD APPLICANTS AND RECIPIENTS;

Wisconsin's approved FY2024 FSET State Plan included a pledge to serve all at-risk ABAWDs.

Wisconsin is seeking Pledge status for FFY 2024. Effective October 1, 2024, Wisconsin pledges that, through its FSET program, the State agency will be ready on October 1st to offer and provide qualifying activities and services each month an ABAWD is at-risk of losing their benefits beyond the 3-month time limit.

Pledge services will be offered across the entire state.

2. ESTIMATED COSTS OF FULFILLING ITS PLEDGE;

In Wisconsin's approved FY 2024 FSET State Plan, DHS estimated that it would cost approximately \$22,496,000 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 FFY2024 estimate (\$370/member).
2. The number of potential at-risk ABAWDS expected in the State during FFY 2024 (60,800).

Multiplying these two numbers together yields a total of \$22,496,000.

3. A DESCRIPTION OF MANAGEMENT CONTROLS IN PLACE TO MEET PLEDGE REQUIREMENTS;

Wisconsin has implemented a host of management controls to ensure that the pledge to serve all at-risk ABAWDs will be 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, 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;

In Wisconsin's approved FY 2024 FSET State Plan, DHS anticipated that there would be approximately 60,800 ABAWDs in the State during FFY 2024, 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
- 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.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

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 veterans with SBEs (veterans significant barriers to employment) eligible spouses, and other eligible individuals. The JVSG staff provide services to eligible veterans through a statewide network of DVOP, LVER, and Consolidated DVOP/LVER staff (Assumes both DVOP and LVER duties). Department of Workforce Development- Division of Employment and Training, Office of Veterans Employment Services (OVES) has staff assigned and located in each of the 11 Workforce Development Areas in Wisconsin.

DVOPs provide comprehensive assessments, career guidance, individualized employment plans, staff assisted services, 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. DVOP develop outreach locations that are best serving to SBE veterans seeking employment and other services. DVOP staff work with many community partners, such as County Veteran Service Officers, veteran service organizations, Homeless Veteran Rehabilitation Programs, correction facilities, and other veteran-centric/community entities that provide veterans services other than employment such as filing disability claims, food, shelter, medical/mental health services, and other resources.

JVSG DVOP staff partner with these agencies to create an all-source environment where a veteran seeking services will have the opportunity to work with DVOP staff and receive other services at the same location. The goal of outreach is to identify veterans seeking other services germane to veterans and providing employment and other services/resources at one location.

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 on conducting job searches and workshops, establish job search groups, 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 and eligible spouses. Working closely with partner agencies assures that 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. JVSG staff partner with numerous state and federal agencies to provide education and workforce training to veterans and certain eligible spouses. Based on comprehensive assessments and the desire and eligibility of the veteran, JVSG staff provide resources and referrals to Wisconsin Department of Veteran Affairs who offer free education through the Wisconsin University and Technical College system using the Wisconsin GI Bill (state). Referral to the WIOA Workforce training program that will provide funding to eligible veterans for specific job-related training to enhance or transfer to new skills required for careers. Referral to Veteran Affairs for enrollment into various training programs using the Montgomery GI Bill, Post 9/11 GI Bill, Chapter 31 – Veteran Employment and Readiness program; or state/federal Apprenticeship programs and those associate with apprenticeships – Troops to Teachers, Helmets to Hardhats, Veteran In Piping, Combat to Construction.

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.

The State of Wisconsin OVES has distinct duties and roles and responsibilities for the DVOP, LVER, and Consolidated staff.

DVOPs: The DVOP provides individualized career services to meet the employment needs of veterans with a significant barrier to employment as identified by DOLVET's guidance, eligible spouses, and other eligible individuals in accordance with VPL's 3-14 changes 1 and 2 and VPL 3-19. 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
- Vietnam 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.

The DVOP duties, to the case managed populations served, include:

- Conduct comprehensive assessment to identify barriers, education, and skill levels.
- Develop individualized employment plan. Develop an IEP 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 job search assistance.
- Document and record all activity using the State of Wisconsin approved computer-based case management system.
- 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.
- Coordinate with LVERs to refer veterans to job openings.

LVERs: 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 to provide JVSG program information and skill market qualified veterans for positions that are seeking candidates.
- 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.
- Submitting quarterly reports on program activities to Regional Supervisors, the Director of OVES, and to the DOL/VETS State Director.

Consolidated DVOP/LVER position: The only Consolidated DVOP/LVER position in Wisconsin is in the Northwest Wisconsin Workforce Development Area. This position is funded through an equal amount of DVOP and LVER funding.

The Consolidated DVOP/LVER position duties include:

- All LVER duties listed above.
- All DVOP duties listed above, except for coordinating with LVERs to refer veterans to Job Openings.
- Ensuring eligibility criteria and population served are compliant with regulations when working as either a DVOP or LVER.

C. **(SUB-PART D) THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR AMERICAN JOB CENTER.**

OVES 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 who develop job opportunities by conducting employer outreach and sharing employer relationships with business service team members and other programs. LVERs assist business services teams in developing job fairs/hiring events, labor law clinics, and business symposiums for local employers. With many business services teams, the LVER and the DVR Business Services Consultant, who have similar population of customers, work in partnership to visit employers to promote respective programs. This allows the business services team, in aggregate, to provide a larger population of individuals to select from. DVOPs partner with WIOA Title I programs, Wagner-Peyser, State Vocational Rehabilitation staff, and other job center-based partner agencies, to develop employment plans and return veterans to self-sufficiency. DVOPs also partner with other agencies and programs not based in the job centers, to include, but not limited to; Veterans Administration Office of Veterans Readiness and Employment, Wisconsin Department of Veterans Affairs, Department of Corrections, County and Tribal Veterans Services Offices, and job center-based programs to provide case management services for co-enrolled veterans served by the Homeless Veteran Reintegration Program. The partnership with these agencies enhances the whole-person approach that allows multiple agencies to mitigate various barriers (homelessness, justice-involved, mental health, etc..) and provide services to veterans in one location to develop a collaborative effort to foster the best process for causing the veteran to become independent in their efforts to reduce barriers, use eligible benefits, and gain employment.

JVSG LVER and DVOP staff partner with the Wisconsin Department of Veterans Affairs, Wisconsin Department of Military and ESGR to provide information at National Guard reintegration events. These events provide another opportunity to connect with National Guard and Reserve members that are eligible for JSVG services.

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 FY 2022 and subsequent years 1% of the grant allocation will be set aside for the Incentive Awards. Per Title 38, U.S.C. Section 4102A(c)(7), 1% of the Jobs for Veterans State Grant (JVSG) allocation states receive is designated 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 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 selection committee of Wisconsin DWD/DET/JVSG Leadership will be used to determine recipients of incentive awards.

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), including labor exchange services funded by the Wagner-Peyer 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 not 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.

Nomination and Selection Criteria

Nomination Guidance: All nomination submissions must be submitted in a memorandum identifying the office or employee to be nominated, location, work address, telephone number, detailed reasons for nomination; and name, contact person and telephone number of the person submitting the nomination.

Selection Criteria: Evaluations will be based on activity or activities conducted to promote veteran employment. Acceptable awards are defined broadly to accommodate the differences in state laws and union agreements.

Selection criteria for award recipients will be based on performance or activities during the fiscal year for which the award is given. Selection criteria will include both objective and subjective data. A selection 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. The committee also will take extra care to recognize those individuals working in various specialized programs that serve certain target groups of veterans in each state.

Considerations will be based on:

- Development of a program for which the impact may not be directly measurable (e.g., a resume skill building program)
- Promotion of entry into federal employment
- Promotion of Hire Veterans Medallion Program
- Outstanding case management
- Exemplary Job Fair Support
- Vocational rehabilitation marketing; direct marketing to employers-Note: This is an example of how awards criteria may foster partnerships, as vocational rehabilitation specialists often work with or rely upon assistance from DVOP or LVER staff.
- Exceptional performance beyond job requirements or outside of established performance goals
- Ideas that are implemented to improve the employment delivery system, improve performance, reduce time or cost, or to promote collaboration.
- Performance measures- Note: If used, must reflect the given performance period.
- Outreach/community-relations efforts, e.g., Chambers of Commerce, employers, etc.
- Generation of positive publicity for a local office; increase awareness of relevant issues within the employer community.
- Enhancement of on-the-job training, customized job training, or compensated work therapy
- Efforts to assist hard-to-place populations (homeless veterans, etc.)
- Collaborative success in providing all services to veterans; may include success in employer.
- relations and “great customer service” to veteran clients.
- Other pre-defined achievements or measures

Award Limitations

Funding may be dispersed per VPL 1-22 and incentive award amounts may change based on each state’s JVSG allocation. For Incentive awarded in 2022, allocation of funds. will be dispersed in the follow manner:

Total of two (2) office awards of up to \$2,500 each.

All office recognition awards will be cash awards.

Total of eleven (11) Individual cash awards of up to \$2,500 each

Individual Awards: Disabled Veterans’ Outreach Program (DVOP) specialists, Local Veterans’ Employment Representative (LVER), or Consolidated DVOP/LVER staff, and any other individual who provides employment, training, and placement services to veterans under the Workforce Innovation and

Opportunity Act (WIOA), including 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.

Actions Required:

- Offices and individuals, in accordance with the eligibility rules listed above, can be nominated by anyone. LVERS are available to assist individuals and/or offices with the submissions of a nomination packet.
- All nominations must be forwarded by email to **arrive no later than June 15th of each year**, to the Director Office of Veterans Services, 201 East Washington, Madison, WI. Late packets will be returned without action.
- DWD/DET and/or JVSG Leadership will form a committee of 3 individuals to review and select individuals and offices from the nominations received, using the criteria listed above.
- The selection committee will review nominations and determine awardees beginning on 1 July.
- The JVSG Director will forward the final award selectees to DET and the department for official notification and announcement not later than 31 August.

Disbursement of Funds: All awards will be cash awards. Cash awards received by individual awardees are considered income for tax purposes. Award funding must be obligated no later than 30 September, and the funds must be disbursed no later than 31 December.

1. **Individual 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. 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 provided as cash may be used by offices for a variety of purposes. Awardees may utilize the funds in any manner that is compliant with their applicable regulations and other programmatic restrictions.
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. (SUB-PART B) 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 or equivalent certification, homeless, and 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, Vietnam era veterans facing difficult times finding and maintaining employment, Transitioning members of the Armed Forces who have been identified as in need of intensive services (now referred to as Individualized Career Services); Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities (MTF) or warrior transition units (WTU); and the spouses or other family caregivers of such wounded, ill, or injured members, veterans and recently separated veterans or currently incarcerated and ex-offenders. 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 Veteran Readiness and Employment program.

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS.

The description of how the state implements and monitors priority of service to covered persons is included in the Common Elements of the WIOA Combined State Plan.

G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND AMERICAN JOB CENTER STAFF:

Job Center staff use a triage approach to identify veteran status and/or status of veterans with a significant barrier to employment (SBE). A triage questionnaire is included in the online Job Center of Wisconsin registration process which determines veteran status, status of an eligible spouse of a veteran, or family care giver of wounded, ill or injured service members. The system identifies those determined to have a significant barrier to employment and notifies the Disabled Veteran Outreach Program (DVOP) staff or the consolidated staff of the individual's registration and eligibility for DVOP services. This process is useful as some individuals register for services without entering the job center.

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

Per VPL 01-22, a response to this section is not required.

Individualized Career services that include comprehensive assessments, individual employment plans and follow-up are provided by DVOP staff are record in MIS systems and reported quarterly to DOLVETs.

EMPLOYMENT PLACEMENT SERVICES, AND

Per VPL 01-22, a response to this section is not required.

JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS.

Per VPL 01-22, a response to this section is not required.

H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

Per VPL 01-22, a response to this section is not required.

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

States must identify and set performance targets for specific indicators for direct services to veterans provided by JVSG staff in their state plans. The established JVSG targets will cover veterans served by JVSG staff only.

JVSG performance reporting is done on a program year, vice a fiscal year, to align with DOL reporting for other programs. Program years are from 1 July, through 30 June.

Per Veterans Program Letter 01-22 Attachment 4, Wisconsin is proposing the following JVSG performance targets for Participants who receive JVSG funded services for Program Years 2024 and 2025:

JVSG Performance Measure	PY2022 Actuals	Proposed Levels for PY 2024 & 2025
Employment Rate - 2nd Quarter After Exit	67.7%	64.4%
Employment Rate - 4th Quarter After Exit	65.3%	62.5%
Median Earnings - 2nd Quarter After Exit	\$10,615	\$8,100

OTHER APPENDICES

OPERATIONAL GUIDE TO DEVELOP THE ANNUAL ALLOCATIONS FOR WORKFORCE
DEVELOPMENT AREAS

WISCONSIN WIOA Allocation Process

The Operational Guide to Develop the Annual Allocations for Workforce Development Areas

DRAFT

Bureau of Workforce Training

Prepared by: Gary Denis, November 2009

Revised: March 2010, May 2015, Oct. 2015, Oct. 2016, Sept. 2017, Jan. 2018, Jan. 2020, Oct. 2021,
Feb. 2022, March 2023 Last Revised: July 2023

Introduction

The workforce development activities carried out in Wisconsin's 11 workforce development areas (WDAs) are federally funded through the Workforce Innovation and Opportunity Act (WIOA). Funds provided are considered allotments and are announced through a U.S. Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) usually in April, 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 and hold harmless provisions.

Allocations Team: A small group of workforce professionals from DWD and the WDBs who review the allocation methodology and allocation results prior to the release of the WIOA allocations for each program year.

Area of Substantial Unemployment (ASU): A collection of contiguous census tracts with a combined area population of at least 10,000 and with a combined unemployment rate of at least 6.45%. Unemployment in ASUs is one of the three factors in the youth and adult formulae. ASUs are also considered as part of the excess unemployment factor in the youth and adult formulae. American Community Survey (ACS) and Local Area Unemployment Statistics (LAUS) data are used in the creation of ASUs.

Data Source Contacts: The key staff to communicate with at agencies that produce data used in the allocation formulae. (Attachment A 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, for each county, the average monthly employment total in each NAICS sector in the most recent calendar year of available data is compared to the employment total from five years prior. If a NAICS sector in a county has less employment in the current data than the base year, then that difference factors into the total employment loss. If a NAICS sector in a county has more employment in the current year than the base year, then it contributes zero to the employment loss tally. The NAICS sector values within the counties within each WDA are summed to get WDA totals. Also factored into the WDA totals is the employment loss in "unknown county" by NAICS sector; this total is distributed into the WDA loss totals based on each WDA's percent of current year total employment. The percentage of the total employment loss by WDA is then calculated. Declining Industries uses data from the Quarterly Census of Employment and Wages (QCEW) and is one of the six dislocated worker formula factors.

Disadvantaged Adults: Individuals aged 22 through 72 who received an income, or is a member of a family that received a total family income that, in relation to family size, does not exceed the higher of the poverty line, or 70% of the Lower Living Standard Income Level (LLSIL). WIOA requires college students and members of the Armed Forces to be excluded from the number of disadvantaged youth and adults to the extent practicable. Rural Concentrated Employment Program areas (WDA7 in WI) have a special

adjusted LLSIL. Disadvantaged adult data come from a special tabulation of American Community Survey (ACS) data and is one of the three adult formula factors.

Disadvantaged Youth: Individuals aged 16 through 21 who received an income, or is a member of a family that received a total family income that, in relation to family size, does not exceed the higher of the poverty line, or 70 percent of the Lower Living Standard Income Level (LLSIL). WIOA requires college students and members of the Armed Forces to be excluded from the number of disadvantaged youth and adults to the extent practicable. Rural Concentrated Employment Program areas (WDA7 in WI) have a special adjusted LLSIL. Disadvantaged youth data come from a special tabulation of American Community Survey (ACS) data and are one of the three youth formula factors.

Excess Unemployment: Unemployment above a 4.5% unemployment rate in a WDA or within the WDA's ASU, whichever is greater. Excess unemployment is one of the three factors in the youth and adult formulae. ASU data and additional LAUS data are considered.

Farmer-Rancher Economic Hardship: For each county, the difference in the number of farms from the most recent Census of Agriculture to the previous Census of Agriculture is calculated. If a county has fewer farms in current data than the base year, then that difference factors into the total farm loss. If a county has more farms in the current data than the base year, then this county contributes zero to the farm loss tally. The county values within each WDA are summed to get WDA totals. The percentage of the total farm loss by WDA is then calculated. Farmer-rancher economic hardship is one of the six dislocated worker formula factors.

Insured Unemployment: The number of monetarily eligible persons in the state who submitted a claim for regular unemployment compensation in a benefit year that expired in the most recently completed calendar year. Insured unemployment is one of the six dislocated worker formula factors and is sourced from the UI Division in DWD.

Internal Review Team: A small group of DWD staff who 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 Unemployment: The number of persons in the state who received regular unemployment compensation payments for at least 15 weeks in a benefit year that expired in the most recently completed calendar year. Long-term unemployment is one of the six dislocated worker formula factors and is sourced from the UI Division in DWD.

Lower Living Standard Income Level (LLSIL): An income level determined annually by the Secretary of the Dept. of Labor based on the most recent lower living family budget issued by the Secretary of the Dept. of Labor.

Plant Closing and Mass Layoff : The number of persons in the state reported as being laid off by employers who filed layoff notices with DWD under the Wisconsin Business Closing and Mass Layoff (WBCML) law and/or the federal Worker Adjustment and Retraining Notification (WARN) Act. The figures come from the Bureau of Workforce Training (BWT) in DWD-DET. The timeframe is the most recently completed calendar year. Plant Closing and Mass Layoff is one of the six dislocated worker formula factors.

Unemployment Concentrations: The WDA must meet or exceed the state unemployment rate or have 10% or more of the state's unemployment in order to qualify. Unemployment Concentrations is one of the six

dislocated worker formula factors and is sourced from the most recently completed program year (July-Dec benchmarked, Jan-May final, June preliminary) LAUS data.

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Factors Used in Calculating the WIOA Allocations for WDAs

Youth Formula

For each factor, the percent received by each WDA is determined by the percent of state total that a WDA has of the factor.

1. 33 1/3% from unemployment in ASUs
2. 33 1/3% from excess unemployment
3. 33 1/3% from disadvantaged youth

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. A WDA shall not receive an allocation percentage for a program year that is less than 90% of the average allocation percentage of the WDA for the two program years.

Adult Formula

For each factor, the percent received by each WDA is determined by the percent of state total that a WDA has of the factor.

1. 33 1/3% from unemployment in ASUs
2. 33 1/3% from excess unemployment
3. 33 1/3% from disadvantaged adults

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. A WDA shall not receive an allocation percentage for a program year that is less than 90% of the average allocation percentage of the WDA for the two preceding program years.

Dislocated Worker (DW) Formula

For each factor, the percent received by each WDA is determined by the percent of state total that a WDA has of the factor.

1. 25% from unemployment concentrations
2. 18.75% from long-term unemployment
3. 6.25% from insured unemployment
4. 25% from declining industries
5. 12.5% from plant closing and mass layoff
6. 12.5% from farmer-rancher economic hardship

To reduce some of the volatility of the formula factors on WDAs, a hold harmless provision is applied to the results of the formula. A WDA shall not receive an allocation percentage for a program year that is less than 90% of the average allocation percentage of the WDA for the two preceding program years.

Review Teams

Internal Review Team: Whenever internal review is needed, the following positions may be consulted.

- Policy Initiatives Advisor
- Bureau of Workforce Information and Technical Support (BWITS) Director or Deputy Director
- BWITS Economic Research Unit Lead Worker
- Governance/Compliance Section Chief
- DET Budget Analyst assigned to WIOA

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
- Director, Bureau of Workforce Training
- BWITS Economic Research Unit Lead Worker
- Policy Initiatives Advisor
- Bureau of Workforce Information and Technical Support (BWITS) Director or Deputy Director
- Directors from two WDBs

Calculating the Allocations

The chart below lists the tabs within the 16-tabbed MS-Excel workbook that calculates the allocations for the youth, adult, and dislocated worker programs. 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.

Columns 2, 3, and 4 describe the purpose of the tab. Columns 5,6, and 7 describe the program that tab applies to.

Tab Name:	Calculator	Info/Print	Input	Adult	Youth	DW
Reference			X	X	X	X
DOL Allotment	X		X	X	X	X
Print Allocation	X	X		X	X	X
Calc Adult	X		X	X		
Calc Youth	X		X		X	
Calc DW	X		X			X
3-Part	X		X	X	X	
DW 6-Part	X					X
Plant Closing and Mass Layoff			X			X
Insured and LT Unemp			X			X
Unemp Concentrations	X					X
Farmer-Rancher Economic Hardship			X			X
Declining Industries			X			X
ASU-EU Calculator	X			X	X	X
ASU calculations			X	X	X	X
Updates		X	X	X	X	X

Specific Instruction for each Tab

Reference: 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: 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: Change the column C5-C12 formula reference so it refers to the correct information in the History Section. Enter new PY allotments from the DOL TEGL into the first free column to the right of the “History Section.”

1. Copy the cell references from this new column in the History Section to D5-D12.
2. Enter the TEGL number and date as the information source in Cell B15 and at the end of the source list starting in A27.
3. 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: The Print Allocations tab calculates and displays each WDA’s allocation shares, allocation amount, and 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 tabs. 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 tab and the program year comes from the Reference tab.

Calc Adult: 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 rounds to 100.00000%, 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 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 the 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.
2. Copy the two most recent Program Years 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 Share.
3. 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 does not round to 100.00000%, copy the first column in Section 1 where the total rounds to 100.00000% to Section 2.
4. The Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used or use Paste Special, Values and Number Formatting to place the correct numbers here.

Calc Youth: 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 rounds to 100.00000%, 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 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 the 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.

2. Copy the two most recent Program Years 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 Share.
3. 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 does not round to 100.00000%, copy the first column where the total rounds to 100.00000% in Section 1 to Section 2.
4. The Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used or use Paste Special, Values and Number Formatting to place the correct numbers here.

Calc DW: This tab applies the hold harmless provision to the Dislocated 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 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 DW 6-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 rounds to 100.00000%, 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 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 the 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.
2. Change the references in Section 1, column C to reference the allocation shares from the two most recent program years prior to the year allocations are being calculated for.
3. 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 does not round to 100.00000%, copy the first column in Section 1 where the total rounds to 100.00000% to Section 2.
4. The Allocations developer must change the references in Section 3, column C to reflect the Section 1 column used.

3-Part: This tab is used to calculate allocation shares for the adult and youth formulae. For adult (youth), the three factors are unemployment in ASUs, excess unemployment, and disadvantaged adults (youth). Each factor is 1/3 of the share. 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 Disadvantaged," & J, "Youth Disadvantaged," change once every five years and must be updated manually based on instructions from the U.S. Department of Labor.

DW 6-Part: 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 the Calc DW tab, 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 updates dates.

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.

- Insured Unemp comes from column D of the Insured and LT Unemp tab.
- The % Insured Unemp comes from column C of the Insured and LT Unemp tab.
- The data for LT Unemp comes from column F of the Insured and LT Unemp tab.
- The % LT Unemp comes from column E of the Insured and LT Unemp tab.
- The Number Affected in WBCML and/or WARN Notices comes from column E of the Plant Closing and Mass Layoff tab.
- Percent of Total Affected by WBCML and/or WARN Notices is accessed from column F of the Plant Closing and Mass Layoff tab.
- The % of Unemp with threshold comes from column C of the Unemp Concentrations Tab.
- WDAs where unemployed concentrations are a factor is imported from the Unemp Concentrations tab, column D.
- The # of Farm Loss comes from the Farmer-Rancher Economic Hardship tab, column E.
- The % of Farm Loss comes from the Farmer-Rancher Economic Hardship tab, column F.
- Employment Decline is from the Declining Industries tab, column I.
- The % Tot Decline comes from column J of the Declining Industries tab.
- Unemployed (LAUS) is 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. The figures here are just for reference.

Plant Closing and Mass Layoff: WDAs receive a prorated share of the total number of persons reported as being laid off from their employment by employers who file a layoff notice with DWD under the WBCML law and/or the federal WARN Act. The data used reflects impacted employee counts from the initial layoff notices filed with DWD during the previous calendar year; the data does not cover subsequent updates that alter the impacted employee counts. The primary reason for adopting this approach is that updates filed with DWD may adjust impacted employee counts from a prior calendar year. When an employer notice affects multiple WDAs and the employer does not specify the location of the affected employees, all impacted WDAs receive an equal share from the notice. The Program and Policy Section within BWT supplies this data. The Allocations Developer copies in this data by WDA from the electronic report provided by the Program and Policy Section to the next available column in the Historic Information section.

The number of employees impacted by WBCML/WARN notices for the most recently completed calendar year are entered in the appropriate calendar year columns. The percent shares are calculated automatically in column F. This data automatically exports to the DW 6-Part Tab, columns H & I.

Insured and LT Unemp: The purpose of this tab is to calculate the relative share each WDA will receive of the state's long-term unemployment and insured unemployment for the Dislocated Worker calculation. Long-term unemployment and insured unemployment data are sourced from the Unemployment Insurance Division.

- Insured Unemployment must be entered into cells D7 to D17 and D19 if applicable. Column C calculates the WDA shares of the state total.
- Long-term unemployment is entered for each WDA in cells F7 through F17 and F19 if applicable. Column E calculates the WDA shares.

The tab exports Columns C, D, E and F automatically to the DW 6-Part tab.

Unemp Concentrations: The purpose of this tab is to determine whether a WDA qualifies as having a concentration of unemployed. The tab calculates the state's unemployment rate for the prior program year, and then calculates the value of 10% of the state's unemployment for the prior program year. If a WDA's unemployment rate (as calculated in column G) equals or exceeds the state rate or if the WDA number of unemployed (column H) equals or exceeds 10% of the state's total unemployment, the WDA qualifies for this factor. The WDAs that qualify receive a relative share based on their share of the total unemployment of the qualifying WDAs.

The Allocations Developer has nothing to manipulate on this tab. 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.

The box that is marked informational in this tab illustrates how each WDA qualifies for the factor. Some WDAs qualify by having 10% or more of the state's total unemployment, some because their unemployment rate is equal to or 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.

Farmer-Rancher Econ Hardship: This tab calculates each WDA's share of farmer-rancher economic hardship experienced in the state. For each county, the difference in the number of farms from the

most recent Census of Agriculture to the previous Census of Agriculture is calculated. If a county has fewer farms in current data than the base year, then that difference factors into the total farm loss. If a county has more farms in the current data than the base year, then this county contributes zero to the farm loss tally. The county values within each WDA are summed to get WDA totals. The percentage of the total farm loss by WDA is then calculated. Cells E7:F18 are exported to the DW 6-Part tab to columns L & M.

Declining Industries: This tab has two sections.

Section A calculates WDAs' relative shares of the State's declining industries total.

- Column I sums the two-digit NAICS declining industry figures by WDA.
- Column J is the WDA share of the State's declining industry total.
- Data in columns I & J move to the DW 6-Part tab in columns N & O.

Section B provides the raw data by two-digit NAICS. The most recent calendar year for which data is available is compared to the employment total from five years prior. If a NAICS sector in a county has less employment in the current data than the base year, then that difference factors into the total employment loss. If a NAICS sector in a county has more employment in the current year than the base year, then it contributes zero to the employment loss tally. The NAICS sector values within the counties within each WDA are summed to get WDA totals. Also factored into the WDA totals is the employment loss in "unknown county" by NAICS sector; this total is distributed into the WDA loss totals based on each WDA's percent of current year total employment. The percentage of the total employment loss by WDA is then calculated.

All of the county data is copied in from a WisConomy data pull or QCEW internal file for suppressed data.

- Column I: This column calculates the number of job losses that have occurred by subtracting industry employment for the base year data set (column G) from the industry employment in the most current year (H). 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.

ASU-EU Calculator: 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 Developer's role on this tab is checking and validating as all actions are done automatically.

- Column G calculates the ASU Unemployment Rate for each geographic area listed in column A by dividing column C data by the sum of columns C & D. The resultant ASU unemployment rate is checked by column I to discern if the rate is at least 6.45%. If it is, the total number of ASU unemployed in the WDA (column C) is entered into column I in the summed row for each WDA. If the ASU unemployment rate is less than 6.45%, a zero is entered into sum row of column I. 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 columns 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 Unemp 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 L & K 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.

ASU Calculations: 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 rate has to be at least 6.45%, 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 in the state. July-December of the prior year uses LAUS benchmarked data; data for the current year January-May uses revised data; and June uses preliminary data (If the LAUS data are reviewed in the following year, the newer figures are likely not to match exactly to the LAUS data in the ASU Calculations tab because of revisions and/or benchmarking). Census data is available by census tract. If an area does not have a 12-month average unemployment rate of at least 6.45%, surrounding census tracts can be added (or subtracted) until the contiguous area reaches a rate of at least 6.45%. It is possible for a WDA to not have an ASU.

Since monthly LAUS data is not available at the census tract level, the ratio of unemployment in census tracts in a given county that are being included in the ASU area to total unemployment in the county (column AB) is multiplied by the total LAUS unemployment and employment (12-month average) for that county. This total is called the ACS-Share and is column O in this tab.

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 allocation process.

Updates: This tab will be used to document changes to the workbook when notable changes are performed.

Attachments

Attachment A: Data Source Matrix

ATTACHMENT A: DATA SOURCES FOR THE WIOA ALLOCATIONS		
Data Required to Calculate Allocations	Contact Name	Source
<ul style="list-style-type: none"> • Excess Unemployment • Unemployment in ASUs • Unemployment Concentrations 	Sheila Ulrich (608) 733-3936	Local Area Unemployment Statistics (LAUS), BWITS, DWD
<ul style="list-style-type: none"> • Disadvantaged Adults • Disadvantaged Youth 	Tom Pethan (608) 733-3913	US Department of Labor, Employment and Training Administration
Farmer-Rancher Economic Hardship	Tom Pethan (608) 733-3913	US Census of Agriculture
<ul style="list-style-type: none"> • Insured Unemployment • Long-Term Unemployment 	Kinen Fleming 608 405-4078	Unemployment Insurance Division, DWD
Plant Closing and Mass Layoff	Stephanie Elmer (608) 733-3869	Dislocated Worker Unit, BWT, DWD
Declining Industries	Sarah Hoffman (608) 733-3882	Quarterly Census of Unemployment and Wages (QCEW), BWITS, DWD