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State of Wisconsin  
Department of Workforce Development  
Jim Doyle, Governor  
Roberta Gassman, Secretary  
Ron Danowski, Division Administrator

June 12, 2007

Ms. Janet Sten  
Federal Coordinator for Plan Review and Approval  
USDAOL/ETA  
Office of Workforce Investment  
Division of Workforce System Support, Room S4231  
200 Constitution Avenue, NW  
Washington, DC 20210

Dear Ms. Sten:

This is in response to the Department of Labor's June 4, 2007, communication regarding Wisconsin's pending WIA State Plan Modification 2007-2009. We appreciate the work of the review team and the opportunity to provide additional information.

Attached is the addendum in response to the five issue areas the review team identified.

Please directly contact Gary Denis at (608) 266-6886 or by email at [gary.denis@dwd.state.wi.us](mailto:gary.denis@dwd.state.wi.us) should you need further information or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron Danowski', written over a horizontal line.

Ron Danowski  
Division Administrator

cc: Byron Zuidema, Regional Administrator  
Catherin Brooks, ETA

Attachment

**Addendum June 12, 2007**

**Responses to the Department of Labor  
for the  
Wisconsin Workforce Investment Act State Plan 2007- 2009**

**Replace for  
VIII.G.4.a. Appeal Process (Page 39)**

A procedure was established in the state's initial year policy for training providers to appeal a denial of their eligibility to be on the ITA list. It also addresses appeal situations for a provider's termination and removal from the State list. The policy includes the following specific section on the appeal process:

"Training providers have a right to appeal a local or State decision denying them eligibility or terminating them on the local and State List of Eligible Training Providers. The primary reasons for denial and termination, as cited in the Workforce Investment Act (WIA) section 122 and Regulations 663.510, are a training provider: 1) has not met performance standards, 2) has provided inaccurate information, and 3) has "substantially" violated the Act. In all cases, consultation between the State and local Workforce Development Boards (WDB) must take place before action can be taken against the training provider.

When an eligible training provider is terminated from the list, the following procedures will be followed:

- The training provider will be notified in writing of the action to terminate, and the cause for the termination. Depending on the discussion between the local WDB(s) and the State, one of these entities will author the letter. It will be in a prescribed format agreed upon by both entities.
- The letter will say that in 60 calendar days from the date the letter was signed, the training provider will be removed from the State List of Eligible Training Providers.
- The letter will also inform them of the process they follow to appeal the action."

**Replace for  
VIII.K.5. Reallocation (Page 44)**

The state has a process in place for recapturing and reallocating funds. If a WDB is below the 80 percent obligated at the end of year one, reallocation will occur. The amount recaptured must be based on the amount by which the prior year's unobligated balance of allocated funds exceeds 20 percent of that year's allocation for the program, less any amount reserved for the cost of administration (up to 10 percent).

Funds not fully expended after the end of the two-year grant period will be deobligated. The Division will issue these recaptured amounts as additional WIA grants to WDBs that have expended all their funds during the two-year grant period and will be able to expend the additional funds by the end of the third year of the grant. DWS allows grantees 60 days to close their grants. The recapture process will occur after this 60-day period.

## Replace for

### **IX. H. Faith-Based and Community Organizations (Page 79)**

Faith-based and community organizations (FBCOs) have been essential in outreach to their constituencies for the workforce system particularly with specialized support. The connections with and utilizations of FBCOs starts at the top of state government. Governor Doyle has a director of faith-based initiatives, Julietta Henry, who serves as his liaison for faith and community-based activities. An example of how these organizations are actively involved in specific employment and training activities, Wisconsin Community Action Program Association (WISCAP) has played a vital role in outreach for the workforce system. As a voluntary association of the state's 16 Community Action Agencies and three special purpose agencies, the Governor saw the opportunity to build on his *Grow* Initiatives with the Skills Enhancement Program utilizing this state-wide community network. In addition to general purpose revenue support, WISCAP was the recipient of WIA state set-aside funds to implement this program (addressed in V.G.) This is a high impact initiative that has already demonstrated success in expanding economic opportunity for the working poor by building job skills to obtain living wage employment with health insurance.

The state also reinforces the value of FBCOs as training providers to maximize consumer choice. For example, there are a large number of private, faith-based post-secondary and health care institutions that offer programs approved for the state's ITA list including Marquette, St. Norbert, Viterbo, Cardinal Stritch, Concordia, Carthage, Maranatha Baptist, Wisconsin Lutheran and, out-of-state providers such as the University of St. Francis, Olivet Nazarene, Loyola, St. Scholastics, St. Mary's, St. Thomas, Trinity College and Trinity University as well as health care facilities St. Joseph (Marshfield), St. Joseph Residence (New London), St. Michael (Milwaukee), St. Luke's (Milwaukee), and Holy Family Memorial Health (Manitowoc).

For the WIA Local Plans, DWD specifically requested the WDBs provide examples of "strategies for Faith-based and Community Organizations" to increase the opportunities for their participation "as committed and active partners in the One-Stop delivery system." Examples at the local level within the WIA infrastructure include:

- Ensuring FBCOs are included in all competitive RFPs and as subcontractors for special grant initiatives
- Referring a client to FBCOs when appropriate as part of their employment plan
- Inviting FBCOs to hold itinerate services at the job centers
- Creating out-stations at local faith centers to serve as computer resource areas
- Participating to serve on the local job center coordination teams
- Coordinating services specifically for special needs populations and recent immigrant members of a community
- Sharing resources for joint public service announcements and extensive network referrals.

A specific example of a successful collaboration project occurred in the North Central Wisconsin Workforce Development Area. The WDB facilitated a group of 43 service providers, primarily FBCOs, to identify the needs and strategize how to address the gaps in services for the emerging Latino population in central Wisconsin. Leadership from the group wrote and received a grant that now provides four bi-lingual navigators in an outreach effort to serve the emerging Latino community. The WDB staff and the Chair of the One Stop Consortium are active members in this initiative. From this group, relationships have developed that will undoubtedly lead to further partnerships and integration into the job center system.

Finally, the inclusion of faith-based organizations in the Wisconsin Works (W-2) program was encouraged because of the advantages that these agencies offered in the successful administration of the W-2 program. Historically, the faith-based organizations have always been involved not only in the spiritual growth and strengthening of their communities but also in providing critical services such as health care, counseling, shelter, etc.

The W-2 program effectively employed faith-based organizations through subcontracts in order to provide critical components of services to W-2 participants. Some of the areas for which the W-2 program used the faith-based organizations include the following:

- Case management services
- Life-skills training
- Parenting skills
- Job development
- Supported employment
- Drop-in child care centers
- Money management
- Time management
- Drug screening and counseling
- Conflict management
- Management skills.

The participation of faith-based organizations in W-2 has since declined from its peak at the beginning phase of the W-2 program where W-2 agencies were required to subcontract with them as part of the performance standards that DWD established for W-2 agencies to meet. However, because of limited state funding to the W-2 program that requirement has been removed.

DWD's Equal Opportunity Specialist, William Franks, is the contact person for ensuring that state policies and guidelines are updated to comply with the Federal Equal Treatment Regulations.

#### **Add**

##### **X.D.1.d. Performance Continuous Improvement (Page 81)**

Shortly before negotiations with the U.S. DOL commenced on June 8, 2007, we received further information from the Regional Office regarding their expectations for goal setting and negotiating. We reviewed DOL's counter proposals and made a few adjustments based on our participant and economic data. We have reached agreement on 16 of the 17 performance goals for PY07-08. The agreed upon goals address DOL's questions regarding continuously improving performance. Staff are gathering the necessary data to support the state's position regarding the Adult Average Earnings measure, which is the only goal still under discussion. The current status of these negotiations are reflected in Revised Attachment N on page 8. As you can see on the attached chart, based on the formal negotiations with the Regional Administrator, the performance levels demonstrate the goal for continuous improvement given the current economic environment. Once agreement has been met on all of the measures, we will further expound on continuous improvement of performance for this section, update X.D.8., and provide the final Attachment N.

#### **Add to**

##### **X.D.2. Targeted Groups (Page 81)**

The Division maintains a data warehouse that is Internet accessible and available to any State and local staff who have requested secured access to the site on which the warehouse resides. This warehouse is developed using Business Objects and Web Intelligence (WEBI) software applications. The warehouse has numerous reports that track targeted populations based on services received, participant characteristics, co-enrollment and caseload management. The reports are updated and refreshed on a weekly basis and allow staff to monitor program and participant activities for active as well as exited participants.

Annually, following the submission of the WIA Annual Report, performance staff produce a WIA Title 1 Performance Achievement Report that tracks outcomes for participants in target groups. Examples of the various reports are included below. Local WDA samples and multiple program years are available upon request.

**Statewide Employment Retention for Targeted Populations  
Program Year 2004**

	Employed in Q1 after Exit		Employed in Q3 after Exit		Employed in Q5 after Exit	
	Male	Female	Male	Female	Male	Female
<b>Adults</b>						
Limited English Language Proficiency	27	65	21	59	19	50
Single Parent	154	730	130	672	120	602
UC Claimant or Exhaustee	124	237	118	221	107	203
Low Income	518	1181	448	1085	396	975
TANF	42	318	38	285	33	252
General Assistance	21	135	18	122	17	107
Pell Grant	29	166	26	155	23	143
Displaced Homemaker	0	7	0	6	0	5

	Male	Female	Male	Female	Male	Female
<b>Dislocated Workers</b>						
Limited English Language Proficiency	81	46	76	44	64	39
Single Parent	154	425	146	410	135	391
UC Claimant or Exhaustee	1614	1571	1552	1516	1467	1447
Low Income	23	70	22	65	20	60
TANF	0	22	0	20	0	18
General Assistance	0	3	0	3	0	3
Pell Grant	58	114	57	112	53	106
Displaced Homemaker	6	46	6	42	6	41

	Male	Female	Male	Female	Male	Female
<b>Youth</b>						
Basic Literacy Skills Deficient	312	331	263	282	229	237
Out-of-School Youth	156	224	134	198	119	173
Homeless, Runaway or Foster child	35	64	32	54	28	43
Pregnant or Parenting	35	197	27	176	25	156
Offender	110	41	92	36	79	31
Needs Additional Assistance	393	573	331	494	291	432

**Statewide Average Earnings for Targeted Populations  
Program Year 2004**

	Average Earnings Q1 after Exit		Average Earnings Q2 after Exit		Average Earnings Q3 after exit		Average Q2 &Q3 Earnings for those employed in all 3 quarters	
	Male	Female	Male	Female	Male	Female	Male	Female
<b>Adults</b>								
Limited English Language Proficiency	4827	3302	4784	3589	5193	3340	11558	7754
Single Parent	4043	3919	3640	3917	3974	4080	8789	7998
UC Claimant or Exhaustee	5614	4266	5570	4132	6260	4342	12520	8908
Low Income	4433	3848	4401	3820	4668	3931	10015	8380
TANF	4743	3678	4816	3764	5043	3948	11217	8495
General Assistance	4055	3236	4259	3151	3729	3406	9390	6966
Pell Grant	5253	5361	5283	5454	5239	5651	11113	11706
Displaced Homemaker	0	5081	0	5317	0	4123	0	10040

	Male	Female	Male	Female	Male	Female	Male	Female
	<b>Dislocated Workers</b>							
Limited English Language Proficiency	7137	5256	7085	5396	7365	5013	15036	10759
Single Parent	6870	5492	6991	5467	7103	5851	14269	11450
UC Claimant or Exhaustee	7821	5829	7885	5732	8004	5940	16128	11954
Low Income	7271	4672	6844	4787	8017	5518	15836	10319
TANF	0	4829	0	4875	0	4522	0	9695
General Assistance	0	2693	0	2445	0	2007	0	5081
Pell Grant	7016	6321	7216	6223	7265	6391	15086	13209
Displaced Homemaker	7354	5065	7802	5001	7758	5079	15560	10721

	Male	Female	Male	Female	Male	Female	Male	Female
	<b>Youth</b>							
Basic Literacy Skills Deficient	2556	2214	2736	2181	2681	2322	6314	5325
Out-of-School Youth	2799	2779	2729	2704	2827	2825	6237	6169
Homeless, Runaway or Foster child	2678	1848	2729	1791	3084	1864	7231	4607
Pregnant or Parenting	2255	3182	2485	2870	3159	2998	6238	6730
Offender	2616	2730	2483	2308	2430	2661	6023	5975
Needs Additional Assistance	2520	2413	2686	2451	2550	2463	5866	3296

**Statewide Race and Ethnicity Employment Outcomes  
Program Year 2004**

WIA Title 1 Adult Program 2720 Exited

Hispanic or Latino	American Indian or Alaska Native	Asian	Black or African American	Hawaiian or Pacific Islander	White
180	77	45	961	24	1587

	Employed in Q1 after exit.	Retained employment in Q2 after exit.	Retained employment in Q3 after exit.
Hispanic or Latino	138	129	116
American Indian or Alaska Native	65	57	52
Asian	39	38	35
Black or African American	670	587	514
Hawaiian or Pacific Islander	16	14	13
White	1318	1122	1028

WIA Title 1 Dislocated Worker Program 4678 Exited

Hispanic or Latino	American Indian or Alaska Native	Asian	Black or African American	Hawaiian or Pacific Islander	White
204	54	78	384	20	4106

	Employed in Q1 after exit.	Retained employment in Q2 after exit.	Retained employment in Q3 after exit.
Hispanic or Latino	170	162	147
American Indian or Alaska Native	45	43	40
Asian	69	68	59
Black or African American	312	297	285
Hawaiian or Pacific Islander	19	19	18
White	3558	3421	3260

## WIA Title 1 Youth Program

1903 Exited

Hispanic or Latino	American Indian or Alaska Native	Asian	Black or African American	Hawaiian or Pacific Islander	White
145	50	99	588	9	1138

	Employed in Q1 after exit.	Retained employment in Q2 after exit.	Retained employment in Q3 after exit.
Hispanic or Latino	87	74	64
American Indian or Alaska Native	29	24	23
Asian	68	38	33
Black or African American	360	300	257
Hawaiian or Pacific Islander	6	6	4
White	775	673	581

Revised Attachment N

PY 07/PY 08 Performance Negotiations  
Performance History – State of Wisconsin

<b>Wagner-Peyser Performance</b>									
Wisconsin	PY05*	PY06 Q3		PY 05* National Percentile	PY 2007 GPRA Goal	State Proposal PY 2007	Final Negotiated PY 2007	State Proposal PY 2008	Final Negotiated PY 2008
	Actual	Actual	Negotiated						
Entered Employment Rate	66.6	65	64	60	65%	65.0	<b>65.0</b>	65.3	<b>66.0</b>
Employment Retention Rate	89.1	88	81	95	82%	82.2	<b>86.0</b>	82.6	<b>87.0</b>
Average Earnings*	*\$13,990	\$13,340	\$11,434	85	\$10,750	\$11,605	<b>\$13,500</b>	\$11,663	<b>\$13,800</b>
*PY05 Average Earnings data is from ETA 9002C PY 2006 1st quarter reports.									