

# InterOffice Memo

Department of Workforce Development  
Division of Workforce Solutions

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To: WDB Executive Directors, WDB Chairs, Chief Local Elected Officials, Job Center Operators, and Job Center Partners

From: Bettie A. Rodgers, Administrator  
Division of Workforce Solutions

Subject: **Workforce Investment Act (WIA) Policy Update 03-05 -- Requirements for Comprehensive Job Centers**

## Background

A draft "Requirements for Comprehensive Job Centers" was distributed for review and comment in February 2003. The Division received comments from 32 individuals representing Workforce Development Boards, Job Center management teams, and a variety of Job Center partners. A summary of comments received is attached for your information. We thank all of those who took the time to consider the proposal and provide the feedback needed for Division of Workforce Solutions (DWS) to develop informed policy guidance.

The comments we received on the proposed requirements raise a number of substantive issues that will require further consideration by DWS. In addition, several key events have occurred or are in process that may influence how Wisconsin's Job Center system evolves in the future.

- ◆ Reauthorization of the Workforce Investment Act is now under consideration in Congress and appears to be on a "fast track". The reauthorization includes a focus on the one-stop system, with provisions that may ultimately influence how Wisconsin approaches further development of its Job Center system.
- ◆ The DWS is engaged in planning to improve integration of our workforce development service delivery system, including significant research in other state activities. Findings from this research are likely to influence future policy direction for Wisconsin Job Centers.
- ◆ The Department and Division have new leaders who are learning about and reviewing a full range of issues affecting programs administered by the Department. The Division's plans for service integration are among the various issues under review, following which final leadership direction is expected.

Given the above, DWS is suspending further action on the "Requirements for Comprehensive Job Centers" until further notice. We expect that future efforts on comprehensive Job Center requirements will be pursued within the context of actions related to the above activities.

## **DWS Policy Guidance**

The DWS remains committed to continuous improvement and integration of services within the context of Wisconsin's Job Center System. These efforts will continue to be pursued within the framework of the 1999 Standards for Wisconsin Job Centers, the 2000 DWS Workforce Program Guide, and the WIA Five Year Planning Guidelines as represented through local Five Year WIA plans. The DWS documents provide guidance related to coordination and integration of services to job seekers and employers, required partners under WIA, collaborative planning, cost sharing/cost allocation and other issues central to the development, operation and continuous improvement of Wisconsin's Job Center system.

## **Local Action Required**

Workforce Development Boards and Job Center partners are encouraged to review the existing DWS policies related to Job Centers and continue to work together to develop and continuously improve upon a seamless delivery system of comprehensive workforce development services for job seekers and employers. Specific policy references for review can be found on the Department of Workforce Development (DWD) Internet site at the following locations.

<http://www.dwd.state.wi.us/dws/manuals/default.htm>

- ◆ Workforce Programs Guide, Part 2, Section 1 (D.) -- General Requirements, One Stop (Job Center) Delivery System

<http://www.dwd.state.wi.us/dws/staff/PG.htm>

- ◆ 1999 Job Center Standards and Technical Assistance Notes

<http://www.dwd.state.wi.us/dwdwia/PDF/guidelines.pdf>

- ◆ Workforce Investment Act, Workforce Development Area Comprehensive Plan, Local Plan Guidelines (1999) -- Part V, Pages 5-9.

## **Contact Information**

If you need further information about this policy guidance, please contact your DWD local program liaison or Sheryl Billups at 608-266-9615 or [sheryl.billups@dwd.state.wi.us](mailto:sheryl.billups@dwd.state.wi.us).

cc: Roberta Gassman, DWD Secretary  
DWD Division Administrators  
DWS Bureau Directors  
Edie Sprehn, BPS, Program Operations Section

Attachment: Comment Summary - Draft Requirements for Comprehensive Job Centers

**COMPREHENSIVE JOB CENTER REQUIREMENTS  
A SUMMARY OF COMMENTS RECEIVED  
April 2003**

The Department of Workforce Development, Division of Workforce Solutions distributed draft "Requirements for Comprehensive Job Centers -- WIA Policy Update 03-05" in February, with a request for Comments by March 21, 2003. DWS received 32 sets of comments on this draft policy, with comments submitted by Workforce Development Boards, Job Center Management Teams, and a variety of Job Center Partners. Representatives of vocational rehabilitation agencies, technical colleges, older worker programs and county department of human services among others submitted partner comments.

The following provides a summary of the major themes that emerged from the comment process as well as a more detailed summary of comments received related to each section of the draft "Requirements for Comprehensive Job Centers."

**Major Themes**

Definitions

Clarify definitions. Commenters felt several definitions in the draft report needed to be clarified, including comprehensive job center, assistance, intake, outreach, mandatory services and fair share of proportional use.

Job Center Partners

Clarify location and services of job center partners. Commenters noted the requirements needed to clarify whether partners must have physical co-location to be a comprehensive job center and how fair-share of proportional use will be determined. Many commenters believe physical co-location is not possible in all circumstances and is not a reasonable requirement. Several commenters believe the list of mandatory partners needs to be revised.

Funding arrangements

Clarify funding arrangements. Many commenters did not understand or questioned how fair share of proportionate use would be calculated. In addition, several commenters pointed out specific funding restrictions for their programs that might contradict the suggested funding arrangements. Many commenters believe that it is up to the local areas to figure out how to fund the job centers since the state does not provide funds for this purpose; alternatively the state should provide some additional funds or incentives to fund the centers.

Differences between rural and urban areas

Differentiate between rural and urban job centers. Commenters believe the requirements do not recognize the differences between rural and urban job centers, noting that rural areas would not be able to meet the standards, even if they have excellent job centers. These commenters believe it is important that job centers continue to exist in rural areas to assist clients who cannot or will not travel to a larger area to visit a comprehensive job center.

### Continuous Improvement Model

Review focus on a specific continuous improvement model. Commenters lacked consensus over the value of using the Baldrige criteria to measure performance excellence and continuous improvement. Some commenters believe the model is useful and should be encouraged, while others think the model focuses too much on process and not enough on return on investment. Finally, several commenters believe it is too early to introduce a specific continuous improvement model when many areas are not familiar with the concepts of continuous improvement and do not understand how such a process might help them achieve or improve their business outcomes.

### State Role

Improve state leadership. Several commenters mentioned a lack of state leadership for the job centers, including a lack of incentives for job centers to become comprehensive. Commenters also mentioned that the state programs do not contribute their fair share of funding and are often some of the biggest obstacles to integrated service. In addition, commenters noted current state efforts in planning for an integrated service delivery system and suggested that comprehensive requirements should wait/take the lead from that activity.

### WIA Performance Standards

Use existing (or revised) WIA performance standards. Several commenters stated that the WIA performance standards (and thus WIA services) exclude most older adults who are seeking only part-time employment. They questioned how older adult services were to be provided and funded in the one-stops, particularly if this issue is not addressed during WIA reauthorization. Other commenters believe the proposal is repetitive since the WIA performance standards already exist.

### Data Systems

Integrate data systems. Several commenters mentioned that service integration would not be possible until data systems are integrated.

## **Detailed Summary of Comments by Draft Requirements Sections**

### Vision Statement

- ◆ Is the vision achievable; especially in rural areas -- not all partners are present, funding issues. Resources are limited for cost-sharing agreements; may cause rural center closings. Facility development freeze hurts planning. Job Centers are costing partners more than their prior situations. State must require minimum funding level from all mandatory partners and also support job centers

### Comprehensive Job Center Definition

- ◆ Who decides whether a job center meets the comprehensive requirements -- WDBs? What are the incentives to being comprehensive?
- ◆ Clarify "fair share" and "proportionate use of the system by customers". What are the expectations and what data will be used? Leases/operating agreements should determine fair share.

- ◆ All mandatory services may not be available; does this preclude comprehensive status. No definition of mandatory services. Do mandatory partners have to be at centers full time if services are only by appointment; or are off-site such as at technical colleges.
- ◆ If providers and subcontractors are not mandatory partners, centers could become administrative entities with few services.
- ◆ If fair share is based on system usage, Wagner-Peyser could have a significant share because it serves the general public; would cause an extreme hardship in some areas.
- ◆ Must a job center be "linked" to a comprehensive center; will current centers close if no comprehensive center in their WDA; want the flexibility to develop, fund and staff satellite centers.
- ◆ Draft does not offer the flexibility of compliance initially intended by the standards committee.
- ◆ Does "operating plan at a single location" mean the local plan, or does it duplicate the board plan at the center level. If so, who could develop, approve, etc, a non-board operating plan.
- ◆ Are "provide" and "offered" different? If all partners do not participate, where is the enforcement?
- ◆ Document does not clearly identify expectations; process and timeframe for implementation. Few specific guidelines and quantifiable actions to meet mandates. If interpretations are left to the WDBs, there will be ongoing challenges/interpretations by DWD/DWS; better to publish clear guiding principles and specific service expectations before local planning.
- ◆ Center leaders/financial managers unclear of future role; some have no interest in being comprehensive; don't want to act without clearly defined expectations and guarantee of funding.
- ◆ If non-comprehensive centers can select what services they provide, how will you collect costs for electronic connections to non-sponsored services, referrals to services at other sites.
- ◆ In most areas residents will be served by non-comprehensive centers. Is this policy for comprehensive centers or to all centers? What happens to rural centers and their funding; is this meant to force consolidation.
- ◆ Requirements go beyond federal law/regulations by stating that scheduled itinerant basis; referral and electronic linkage do not meet comprehensive definition. Current law is more flexible.
- ◆ Must all centers provide all mandatory services; if not comprehensive, must all partners pay fair share.

### Job Center Customers

- ◆ State's role confused; state-operated programs pose some of the biggest obstacles to integrated services; section should specify what the state will do in the operation of state programs.
- ◆ Customer choice idea is not currently accurate; services limited to partners present or linked.
- ◆ Is the comprehensive one-stop operator or the Board responsible for assuring all services are available? If the Center, cost sharing agreements should be subject to fiscal audit.

### Job Center Partners

- ◆ Clarify "fair share as it relates to proportionate use of the system". What data and expectations will be used; does lack of fair share mean a center is not comprehensive? How would this would be calculated; is there just one way?
- ◆ What specific intake activities need to occur for compliance with the criteria? Uniform screening tool for resource rooms would be helpful.

- ◆ Clarify "assistance for determining programmatic eligibility" -- has different meanings in different programs; also clarify "funding arrangements".
- ◆ Current cost allocation plan has been workable. Allow local flexibility in determining fair share.
- ◆ Concerns about how standards affect rural areas - lack of space, all programs not present. How are satellite offices to operate; linkages.
- ◆ Funds for operations take funds away from customers; cost sharing may be against federal regulations.
- ◆ No state support for requiring minimum contribution from mandatory partners. Are there consequences to those who withhold participation or contribution. DWD renewed a lease for one center without consulting partners or reviewing the operating agreement. Thus, DWD partner continues to operate without contributing to common area cost. VR needs to treat services available to the general public as a comparable benefit that it cannot fund.
- ◆ Mandatory partners who are not co-located should not be expected to contribute a fair share of operating costs; non-co-located partners may be paying more through facilities and staffing.
- ◆ Proportionate use of the system for cost allocation will be bureaucratic since customers may use many programs; creates turf issues. Usage would shift costs to Job Service and away from small programs. Centers need flexibility to determine a fair and equitable distribution of shared costs.
- ◆ Are people customers of the Center or the partner program?
- ◆ If multiple providers in an area, will there be space for all? Multiple providers in one location could make referrals difficult. If there is no space at a center or no funding, is there still a fair share cost?
- ◆ Will Title V programs be included in activities if not co-located?
- ◆ Mandate partner funding for screening, referral, outreach, JobNet, coordination and use of facilities; state earmarked funds for each county.
- ◆ Cost allocation will be complicated as several programs may provide services. Divide space, equipment, supplies and services among partners; divide shared expenses among those who participate. Take money off the top for comprehensive centers before distributing to programs.
- ◆ Better define separate workforce investment program vs. mandatory partner. Other programs may be in a job center and should contribute to support of the system
- ◆ Cost sharing language too limited. Dane County is developing an operating agreement for all programs, including non-workforce programs. Shared costs are prorated on space occupancy. Older worker programs have problem being at one center per area and participating in cost sharing; but do provide placement of eligible people in the Job Center -- Nine participants working in centers.
- ◆ WDA customers at WTCS is declining, and E & T do not appear to have a very significant role in the system; fair share could have effect on how WTCS assesses merits of participation in Job Centers.
- ◆ Were county government representatives on the committee; standards don't make significant reference to the role of county human services programs in the system.

#### Criteria for Performance Excellence

- ◆ Don't let the process take over the end result; need more language on outcomes and expectations. There are 13 bullets under process management and only one under business results.

- ◆ Extensive training needed for partners/staff to apply principles; need state funding...use Wisconsin Forward Award staff to integrate principles into system; use 1999 standards until Baldrige is in place.
- ◆ Clarify business plan vs. operating plan.
- ◆ Confusion over state's role as policy administrator and program services operator.
- ◆ What is the role of the Workforce Development Board; should be more than compliance monitoring; Incorporates/overlaps existing board structures; implies additional governing group outside the Board.
- ◆ Baldrige doesn't fit Job Centers where no single authority exists; use Return on Investment which measures specific outcomes and shows the value of public funds; easily understood by private sector.
- ◆ Partners try for effective delivery of services without oppressive compliance requirements.
- ◆ Need specific components, partner relationships, tasks, etc.; tie actions to program goals/outcomes.
- ◆ Must a comprehensive center meet 5 management areas or 7 performance excellence criteria?
  - **Leadership**
    - Has "appropriate committee structure" been defined?
  - **Strategic Planning**
    - "local job center budget" bears no resemblance to what deliberative strategic planning really is; budgets are a mere result, not a strategy, approach, issue, action step...
    - "in alignment with and in reference to regional strategies for same planning period" seems to indicate only goals and objectives included in regional strategies are permitted in the plan.
  - **Customer & Market Focus**
    - Clarify "outreach to and intake of program customers" and "controls applied to telecommunication activities."
    - Second bullet uses both "may" and "would". Is one optional and the other mandatory?
    - Section does not mention customer satisfaction surveys.
  - **Information & Analysis**
    - Clarify expectations for information gathering. Does common data reporting systems mean partners are required to use ASSET? What data will be captured, and how; what kinds of measures will be used?
    - We don't need an additional feedback committee.
    - Will fair share costs for systems like ASSET include access; can providers not in the one-stop have access; can providers incorporate their information into ASSET.
    - What does "at the point of exchange" mean; also "related, relevant services sought by dissimilar customer groups".
    - Why only one acceptable cost allocation method; customers may use many services.

- **Human Resource Focus**
- **Process Management**
  - Section is jobseeker-focused. What about employer services like recruitment?
  - JobNet should be the primary job order system for all centers; ERS should also be considered.
  - Listing job search and placement implies all customers receive what case-managed customers get. Job search is done in workshops; placement is usually individualized.
  - List of service differs from WIA core services list -- education and training assistance.
- **Business Results**
  - Develop measure on Return on Investment. Stakeholders want to know if results are worth the funding levels.
  - Many older adults in Title V programs are only seeking part-time work which disallows them from WIA services; performance benchmarks will adversely affect older workers.

Other/Attachment 1

- ◆ Suggest that these standards wait until the Integrated Service Delivery System is implemented.
- ◆ Why are some mandatory partners not in the Centers or are not required to pay fair share – (including state managed programs like DVR and TANF)?
- ◆ Concerns about the cost associated with reaching comprehensive status.
- ◆ What is DHFS role as administrator of senior programs? Links to health programs are not mentioned.
- ◆ Concerns that all mandatory partners must be full-time; should be able to use electronic links for services like education and training, adult literacy, career development, employer services.
- ◆ Were all mandatory partners involved in developing the standards?
- ◆ An index of definitions for specific terminology would be helpful.
- ◆ Clarify how mandatory partners not in an area affects comprehensive center status.
- ◆ What are the benefits to being a comprehensive job center?
- ◆ Too much emphasis on getting the product -- final should be limited to maximum of 15 pages.
- ◆ The standards repeat already-existing WIA requirements; focus on other areas such as quality of service, branding, funding and state support.
- ◆ Mission and goals of comprehensive centers should evolve from mission of supporting entities and defined operating structures. Then IT, fiscal, etc. can be structured and tailored to fit the entities.