

FORWD DWG Project Implementation Plan (PIP)

Comments & Responses

1. Should WDBs be pushing for training to be completed by 11/2026?

The goal will be to complete training by 09/30/2026

- a. If the answer to the above is no, will DWD be requiring full co-enrollment for those in training?

While co-enrollment is not required it is allowable and encouraged. Funds can be braided across the FORWD DWG and other funding sources in any case where the services delivered are allowable under both funding sources. Co-enrollment is always encouraged.

2. Is there a 12-month follow-up?

No, WDBs are not required to provide follow-up funded by FORWD, but co-enrollment is strongly encouraged and could allow for follow-up services to be delivered using other fund sources.

3. Must training be available on the Eligible Training Programs List (ETPL) in order to be funded by the FORWD DWG?

Yes, if the training is being funded using an Individual Training Account (ITA). Training may be funded using a mechanism other than an ITA (e.g., contract) if the criteria identified at [20 CFR 680.320](#) is satisfied.

4. Under the heading of Defined Roles, what is the Wisconsin Department of Health (DHS) providing?

DHS will provide education and coordinate activities related to Individual Placement and Support (IPS) for project operators participating in IPS Disaster Relief Employment (DRE).

The PIP has been updated with this clarification.

5. Under the heading of Employer of Record, is there a contract template for the Employer of Record?

Yes, the following documents are included in the Appendix.

- Appendix A - Participant Placement Agreement
- Appendix B - Placement Site Agreement
- Appendix C - Placement Site Orientation Checklist
- Appendix D - Employer of Record Agreement

6. Can DWD define opioid crisis?

As stated in [TEGL 4-18](#), "the opioid crisis has manifested differently in different areas. In some areas, for example, the chief concern may be a shortage of treatment services. In others, the primary need may be additional health services to curb hepatitis or outbreaks of diseases caused by injectable opioid use.

Successful opioid Disaster Recovery DWG projects will accomplish the following:

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- Facilitate community partnerships that are central to dealing with this complex public health crisis;
- Provide training that builds the skilled workforce in professions that could impact the causes and treatment of the opioid crisis: addiction treatment, mental health, and pain management;
- Ensure the timely delivery of appropriate, necessary career, training, and support activities to dislocated workers, individuals temporarily or permanently laid off due to the opioid crisis, long-term unemployed individuals, and self-employed individuals who are unemployed or significantly underemployed as a result of the opioid public health emergency—including individuals in these populations who have been impacted by opioid use, to promote successful reemployment; and
- Create temporary disaster-relief employment that addresses the unique impacts of the opioid crisis in affected communities.

7. Would mentioning the “FORWD DWG” trigger the need for confidentiality that is similar to how Support to Communities (STC) triggered such actions?

Yes. [Policy 5.7 of the WIOA Title I- A & I-B Policy and Procedure Manual](#) based on [CFR § 38.41](#) requires all case notes and documents that reference or state FORWD or Fostering Opioid Recovery through Workforce Development be marked Confidential because there is no reasonable way to separate FORWD information that "could lead to the disclosure of a disability" from that which may not.

This has been added to the FORWD PIP under the Eligibility Documentation and ASSET Data Entry section.

8. Is it correct that for participants who are co-enrolled in FORWD DWG and a WIOA Title I program that the WIOA Title I program should be the first funder of supportive services?

No, that is not the intent. FORWD DWG funding should be spent prior to WIOA Title I annual formula funding. Local WDBs are also encouraged to maximize the flexibilities allowable within the FORWD DWG to provide support to participants at the highest level(s) possible. The language in the PIP within the Supportive Service section has been updated to clarify. As stated in [TEGL 4-18](#) (page 8), Project Operators must not spend more than 20 percent of their DWG award on supportive services for participants.

9. Is it correct that individuals who are dislocated workers or long-term unemployed do not have to attest to an opioid related impact, but self-employed individuals or those temporarily or permanently laid off must be opioid-related?

Yes, that is correct. See "FORWD Eligibility Table" table in Question 10.

10. Is it correct to read this as eligible individuals who volunteer they have been impacted by the opioid crisis can pursue any training program on the ETPL? And is it correct to read that eligible individuals who do not volunteer opioid impact status would be limited to the

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second option? (How it was with the Type I and Type II Workers in Support to Communities.)

Yes. All employment and training activities must take one or both of the following approaches:

- Reintegration of eligible participants who volunteer that they have been impacted by the opioid crisis. Reintegration activities include career, training, and supportive services.
- Providing career, training, and supportive services to eligible participants aimed at boosting the number of qualified professionals in fields that can have an impact on the crisis. The following are fields that can have an impact on the opioid crisis: addiction treatment, mental health treatment focused on conditions that can lead to or exacerbate opioid addiction and pain management services and practices that the applicant demonstrates could help reduce or avoid prescription painkiller addiction, with the ultimate goal of preparing medical and public health professionals to help impact the causes of the opioid crisis.

Eligible individuals who volunteer they have been impacted by the opioid crisis can pursue any training program for in-demand occupations within your local area AND/OR skills training in opioid recovery and support occupations. Eligible individuals who do not volunteer opioid impact status may pursue skills training in opioid recovery and support occupations.

FORWD Eligibility Criteria			
Participant Employment Goal	Individual wanting to reintegrate into the workforce	Worker who seeks training to provide relief to those impacted by the opioid crisis or address opioid recovery efforts in the local service area.	Disaster Relief Employment positions
Impacted by Opioid Crisis	Eligible participant who volunteers they have been impacted by the opioid crisis	Opioid impact is not required. Eligible participant may share impact, but volunteering status is not required.	Opioid impact is not required. Eligible participant may share impact, but volunteering status is not required.
Skills Training - career, training & supportive services	<ul style="list-style-type: none"> • Skills training for in-demand occupations within the local area • Skills training in opioid recovery and support occupations 	Skills training in opioid recovery and support occupations.	Approved DRE positions
Eligible Participants	<ol style="list-style-type: none"> 1. Dislocated workers, as defined in WIOA section 3(15) 2. Individuals temporarily or permanently laid off as a consequence of the opioid crisis 3. Individuals who are long-term unemployed 4. Self-employed individuals who became unemployed or significantly underemployed as a result of the opioid crisis. 		

* Participants cannot be required to disclose whether they have been impacted by the opioid crisis as a condition of their participation in grant-funded employment, activities, and services.

* Participants' disclosure of impact by the crisis **must be voluntary**.

The PIP has been updated to include the FORWD Eligibility Table.

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11. Does this statement "Grantees cannot require participants to disclose whether they have been impacted by the opioid crisis as a condition of their participation in grant-funded employment, activities, and services" mean that an eligibility checklist cannot have the eligibility criteria (Dislocated workers, individuals temporarily or permanently laid off as a consequence of the opioid crisis, individuals who are long-term unemployed, or self-employed individuals who became unemployed or significantly underemployed as a result of the opioid crisis) listed?

An eligibility checklist or self-attestation may not inquire about **how** an individual has been impacted by the opioid crisis.

Project operators/career planners may only ask the following question to determine that an applicant or eligible participant has been impacted by the opioid crisis:

- Your answer to this question is voluntary. Do you, a friend, or any member of your family have a history of opioid use? Please answer "Yes" or "No".

If the answer is no, is the individual still eligible?

An individual is still eligible to participate as a worker who seeks to enter professions that provide relief to those impacted by the opioid crisis or address opioid recovery efforts in the local service area or in a DRE position AND if they meet one of the 4 eligibility criteria. See eligibility criteria table.

Where is this answer to this question documented? Is DWD collecting this information via ASSET, such as case notes? Or should this be on an application? Is anything being done with this answer?

Self-attestation is allowable documentation for any eligibility criterion not specifically addressed in Chapters [12.3.1](#), [12.4.1](#), and [12.4.2](#).

The "FORWD Eligibility" criteria must be documented with a case note in ASSET that clearly identifies which eligibility criterion applies to the individual along with the applicable sub-criteria. For example: Participants is eligible for FORWD as 3. a. an individual who is long-term unemployed and has not been employed in unsubsidized employment for 4 weeks or longer. [Policy 5.7 of the WIOA Title I- A & I-B Policy and Procedure Manual based](#) on CFR § 38.41 requires all case notes and documents that reference or state FORWD or Fostering Opioid Recovery through Workforce Development are marked Confidential.

12. Can there be shared IEPs between co-enrolled programs?

Yes. [Policy 8.4](#) of the WIOA Title 1-A & I-B Policy and Procedure Manual provides A Note on Co-Enrollment

For participants co-enrolled in multiple programs, the IEP review is an opportunity to review any changes made by partner staff and determine how services can best be integrated or coordinated. For co-enrolled participants, DWD-DET recommends working with partner

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staff to provide joint case management, including joint IEP development and review. This collaboration will enhance service integration and reduce the administrative burden placed on the participant by acknowledging multiple IEPs.

13. Will participant outreach materials be provided by DWD?

No, however, grantees can use funding from their subawards to fund outreach related to the grant.

14. Can DWD provide more clarification how WDBs should be reflected the following language in their grant-related materials?

- The percentage of the total costs of the program or project which will be financed with Federal money;
- The dollar amount of Federal funds for the project or program; and
- The percentage and dollar amount of the total costs of the project or program that non-governmental sources will finance.

These statements can be combined. EXAMPLE: "This workforce product was 100% funded by a \$4.3M grant awarded by the U.S. Department of Labor (DOL)'s Employment and Training Administration (ETA). A hyperlink to the required language is sufficient in cases in which it is not practical to put the acknowledgment statement in the communication itself.

15. Are the DRE positions that are listed in the PIP the only ones that individuals can be employed in while in the grant?

Yes, these are the only acceptable DRE positions without additional approval. Others may be considered, however DWD would need to submit a formal request to DOL for consideration of any additional positions.

16. For the position of Teacher's Aide or Student Monitor, is it exclusively for the demographic of children removed from parental custody due to parental SUD or overdose death?

Yes

17. DWD received a suggestion to add clarity to the Overspending on Wages section.

This section currently reads:

DWD-DET requires project operators, through the employer of record, to pay for the wages and fringe benefits for hours worked by participants, even if there are no remaining subaward funds available to cover those expenses. Additionally, project operators, through the employer of record, are responsible for paying the wages and fringe benefits for hours worked by participants that exceed the maximum allowable hours or months worked (see Hours and Duration in this section of the PIP). Project operators cannot use funds from their WIOA Title I Adult and/or Dislocated Worker formula grants to pay for wages and/or fringe benefits that are provided under the FORWD DWG.

Suggestion is to add language as follows:

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Disaster Related Employment is employment, and all local, state, and federal policies and employment laws apply, i.e. unemployment and worker's compensation insurance requirements apply, overtime for any time worked over 40 hours in a week, benefit eligibility, and wage payment. All hours worked by a participant working in a DRE placement must be paid for all hours worked even if the grant funds are not available. Failure to pay for hours worked is a wage and hour violation under the FLSA and could result in fines.

This statement has been added to the PIP.

18. The PIP states "DWD-DET requires project operators, through the employer of record, to pay for the wages and fringe benefits for hours worked by participants, even if there are no remaining subaward funds available to cover those expenses." Where would the funding come from to support this statement?

The employer of record would be responsible for funding these wages using other funding sources.

19. Should the DRE documents included as Appendix A, B, C, and D be uploaded to the participant's file in ASSET?

Yes, these documents should be uploaded to ASSET if/when they are completed for a participant. Appendix documents that are related to a placement site/employer and are not participant-specific should be retained by the WDB and made available upon request.