

WISCONSIN PYS 2026-2027 (MOD)

CONTENTS

Wisconsin PYs 2026-2027 (Mod).....	1
Overview	4
Options for Submitting a State Plan.....	4
How State Plan Requirements Are Organized.....	5
I. WIOA State Plan Type and Executive Summary.....	6
a. WIOA State Plan Type	6
Combined Plan Partner Program(s).....	6
b. Plan Introduction or Executive Summary	7
II. Strategic Elements.....	9
a. Economic, Workforce, and Workforce Development Activities Analysis.....	9
b. State Strategic Vision and Goals	57
c. State Strategy	62
III. Operational Planning Elements	66
a. State Strategy Implementation.....	66
b. State Operating Systems and Policies	100
IV. Coordination with State Plan Programs	148
V. Common Assurances (For All Core Programs).....	149
VI. Program-Specific Requirements for Core Programs	152
Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B.....	152
Program-Specific Requirements for Wagner-Peyser Program (Employment Services).....	200
Program-specific Requirements for Adult Education and Family Literacy Act Programs ...	243
Program-Specific Requirements for State Vocational Rehabilitation (Combined or General)	268
VII. Program-Specific Requirements for Combined State Plan Partner Programs.....	339
Temporary Assistance for Needy Families (TANF).....	340
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))).....	406
Trade Adjustment Assistance (TAA).....	427
Jobs for Veterans' State Grants	427
Performance Indicator Appendix.....	437

All WIOA Core Programs	437
Additional Indicators of Performance	445
Other Appendices	445

OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

OPTIONS FOR SUBMITTING A STATE PLAN

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- 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)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- 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.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) ¹

[1] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and

activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:

- State Strategy Implementation,
- State Operating Systems and Policies,
- Assurances,
- Program-Specific Requirements for the Core Programs, and
- Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for State-identified populations. Use of links to external websites and documents is permitted within the State Plan narrative submission if such links remain active and adhere to Section 508 accessibility requirements.

Paperwork Reduction Act: The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

Unified or Combined State Plan. Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

Unified State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

Combined State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below.

This is a combined plan

COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

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

Yes

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

Yes

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

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.))

Yes

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

Yes

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

No

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

No

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

Wisconsin's 2024–2027 Workforce Innovation and Opportunity Act (WIOA) Combined State Plan outlines a coordinated, data-driven strategy to strengthen the competitiveness of workers, job seekers, and employers and to ensure a resilient, responsive workforce system. Grounded in the

strategic direction of the Governor's Council on Workforce Investment (CWI), this Plan aligns Wisconsin's workforce, education, and economic development systems around four interrelated goals: Education, Employers, Workforce, and Organization & Resource Alignment

Together, these goals advance a workforce development system that is industry-driven, accessible, accountable, and capable of adapting to rapid economic transformation.

Wisconsin continued building on the success of 2024's Year of the Worker to help Wisconsin employers find skilled talent while providing workers and job seekers with the resources and guidance to attain in-demand skills and family-supporting jobs. Wisconsin's labor force participation rate ended 2025 at 64.2%, which is 1.8 points above the national rate. Total nonfarm jobs in the state increased 6,700 over the year and unemployment held steady at 3.1% which is 1.3 points below the national unemployment rate. Under the leadership of Governor Evers, and with the investment of \$158 million into the Workforce Solutions Initiative (WSI), the workforce system created sustainable solutions to address in local communities and strengthened partnerships with stakeholders across the state.

Since the approval of Wisconsin's 2024–2027 WIOA State Plan, federal workforce policy direction outlined in the America's Talent Strategy has emphasized:

- Industry-led talent pipelines aligned to national economic priorities
- Expanded labor force participation and economic mobility
- Greater system integration and reduced fragmentation
- Stronger outcome-based accountability
- Increased flexibility and innovation to respond to rapid technological change

Wisconsin's existing framework strongly aligns with these principles. This WIOA State Plan modification strengthens that alignment by confirming priorities, evaluating implementation strategies, and advancing coordinated efforts across programs and partners.

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:

- Using \$7.3 million in Industry-Driven Skills Training Fund grants awarded to the Wisconsin Department of Workforce Development (DWD) through USDOL to launch the Wisconsin Training for Resilient Advanced Industry Needs (WisTRAIN) project. Wisconsin will use the funds to deliver employer-driven, occupational skills training grants that focus on the emerging fields of advanced manufacturing and AI. The project builds on the success of Gov. Tony Evers' Workforce Solutions Initiative and aligns with recommendations by the Governor's Task Force on Workforce and Artificial Intelligence.
- Through coordination among WIOA State Plan partners and the Governor's Council on Workforce Investment, Wisconsin seeks to position itself for early and effective implementation of Workforce Pell in a way that complements its existing workforce and education infrastructure, supports transparency and quality assurance, and expands access to short-term, high-value training opportunities statewide.

- Placing renewed emphasis on system integration and coordination across workforce, education, and partner programs. Recognizing that fragmentation can limit effectiveness, Wisconsin continues to advance strategies that promote alignment, communication, and shared accountability.

II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers; individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include—

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which there is existing demand.

II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which demand is emerging.

III. EMPLOYERS' EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Economic Analysis

Wisconsin reflects broader national trends of a cooling labor market. According to the Current Employment Statistics (CES) program, the state reported a total of 3,045,700 non-farm jobs in November of 2025. Outside of the two most recent recessions, 2025 saw Wisconsin's lowest pace of average monthly job growth since 2003.

Data from the Job Openings and Labor Turnover (JOLTS) survey indicates a general slow-down in openings and hirings across the state. The JOLTS 3-month moving average shows job openings declining from a peak of roughly 240-250 thousand in late 2022 to about 130-140 thousand in late 2025. Over that same period, hiring declined at a more modest rate, from about 115 thousand in late 2022 to 90-100 thousand in late 2025.

Despite a cooling labor market, state unemployment remains low relative to the national average. According to data from the Local Area Unemployment Statistics program, unemployment in Wisconsin hovered around 3 percent throughout the duration of 2025, despite growth in the national rate, which stood at 4.4 percent in December 2025. Weekly unemployment insurance claims exhibited no noticeable deviation relative to historical data from 2023 and 2024.

On the wage side of the equation, year-over-year growth in real average hourly earnings throughout the state flattened in 2025, after strong growth throughout much of 2023 and 2024. January of 2025 marked the end of a run of 19 consecutive months of wage gains outpacing inflation, according to data from the Wisconsin CES. Growth in the Midwest consumer price index stood at just 2.7 percent in December of 2025 despite Federal Reserve policymakers cutting their benchmark rate three times in a latter part of the year, to a level of 3.5 to 3.75 percent. The Fed has signaled that it is likely to hold rates at current levels throughout the first half of 2026 as it assesses the impact of these cuts on the health of the labor market and price growth.

Wisconsin's latest (November 2025) labor force participation rate of 64.1 percent remains slightly higher than the national rate of 62.5 percent. However, the state still faces labor quantity challenges. Data from the [Wisconsin Department of Health Services](#) show state birth rates continuing to decline, dropping to 10 live births per 1,000 population in 2024, below that of the U.S. average. Aside from natural changes, research from the [Wisconsin Policy Forum](#) shows that net migration rose in recent years. Since July 2021, the state saw a total population increase of 81,605 residents from net migration – three-fourths from international migration. This surpassed the total amount of net migration between 2004-2021. Wisconsin ranked second among 12 Midwest states in per capita rates of net migration between 2021-2024.

National-level policy shifts continue to cloud the state's economic outlook. The Trump administration's tariff actions on countries such as Canada, China, and Mexico are estimated to impact about [half of the state's imports and exports](#). Other actions from the administration, such as changes in immigration policy, have resulted in a dramatic slowdown in net migration to the U.S. [The Brookings Institute](#) estimates net migration between -295,000 and -10,000 in 2025, and projects this to remain negative in 2026.

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 (December 2025). In-demand occupations include registered nurses, heavy and tractor-trailer truck drivers, retail sales workers,

customer service representatives, maintenance and repair workers, software developers, educators, food preparation and serving workers, engineers, managers, and nursing assistants, among many others. The knowledge, skills, and abilities and credentials required for these occupations vary widely.

Education and Health Services; Trade, Transportation, and Utilities; and Manufacturing are the largest Wisconsin supersectors in terms of employment (QCEW, 2024). Wisconsin long-term employment projections (Table 1) show that Education and Health Services; Professional and Business Services; and Leisure and Hospitality are expected to add the most jobs from 2022 through 2032.

Table 1: Wisconsin Long-Term Industry Employment Projections, 2022-2032

Industry	2022 Employment (1)	2032 Projected Employment	Employment Change (2022- 2032)	Percent Change (2022- 2032)
Total All Industries	3,162,331	3,387,402	225,071	7.1
Goods Producing	652,063	691,269	39,206	6
Natural Resources and Mining	44,399	47,530	3,131	7.1
Construction	130,865	145,415	14,550	11.1
Manufacturing	476,799	498,324	21,525	4.5
Services Providing	2,348,104	2,517,114	169,010	7.2
Trade, Transportation, and Utilities	555,679	587,138	31,459	5.7
Information	44,412	46,961	2,549	5.7
Financial Activities	158,323	168,735	10,412	6.6
Professional and Business Services	326,200	360,419	34,219	10.5
Education and Health Services	675,933	722,573	46,640	6.9
Leisure and Hospitality	271,202	303,335	32,133	11.8
Other Services (except Government)	150,414	161,571	11,157	7.4
Government	165,941	166,382	441	0.3

Self Employed and Unpaid Family Workers, All Jobs	162,164	179,019	16,855	10.4

(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 2022 – 2032

Emerging Demand Industry Sectors

According to the [University of Wisconsin-Stout 2025 AI Industry Survey](#), Artificial Intelligence (AI) spans beyond tools like ChatGPT, encompassing machine learning/deep learning, natural language processing (NLP), robotics, computer vision, expert systems, and generative AI. Employer purposes for using AI include data analytics, customer service, and marketing, among many others.

With the rapid development of AI technology, data centers – specialized computing facilities built to power AI – have become a prominent emerging industry. According to the [Wisconsin Policy Forum](#), there are an estimated 40 data centers located in Wisconsin, with additional projects planned in Port Washington, Mount Pleasant, Deforest, Janesville, and Beaver Dam. [The Brookings Institute](#) estimates there to be a national shortage in the number of electricians and construction workers required to meet labor demand to keep pace with the proliferation of data centers. Once constructed, however, [case studies](#) have shown that data center facilities are not deemed to be as labor-intensive to operate.

Another emerging demand sector in the state is the biotech industry. In July of 2024, Wisconsin was designated by the U.S. Economic Development Administration as a [Biohealth Tech Hub](#), receiving a \$49 million grant from the agency as part of the 2022 CHIPS Act. The Hub is comprised of a public-private consortium of Wisconsin businesses, universities, and state agencies. Grant funds are used to support a range of innovative projects in the bioscience industry.

Wisconsin is part of a major hub driving the future of quantum technology. According to the [Chicago Quantum Exchange](#) (CQE), quantum information science will enhance secure communication, enable more accurate climate models, and accelerate the development of life-saving medicines. The [Wisconsin Quantum Institute](#), housed at the University of Wisconsin-Madison, is a driver of quantum innovation. Based on a recent CQE [analysis](#), around half of quantum jobs require a bachelor's degree or less of formal education. There is the potential for [many thousands of jobs](#) in the CQE region across the quantum ecosystem by 2035.

Per the [State of Wisconsin 2025 Clean Energy Plan Progress Report](#), the state has a goal of 100 percent carbon-free electricity by 2050. State funding provided to the Wisconsin Climate Action Navigators (WI CAN) network supports local clean energy projects. DWD, along with partners at the WI Department of Administration (DOA) and University of Wisconsin-Madison, are constructing a green jobs inventory that will provide a current snapshot of the employment that Wisconsin has in clean energy. 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.

The University of Wisconsin-Madison is playing a [pioneering role](#) in efforts to commercialize fusion technology, while South Central Wisconsin is home to companies in the fusion space.

Employers' Employment Needs

A 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.

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, data literacy, and basic math and language skills. Soft skills include listening, conflict resolution, and teamwork. Employability skills include 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, Long-Term Occupational Employment Projections (Table 2) show specific employment needs in health care 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.

Table 2: Wisconsin Long Term Occupational Employment Projections, 2022-2032

SOC Code	Occupation Title	Employment 2022 <i>(1)</i>	Projected Employment 2032	Numeric Change	Percent Change	Annual Total Openings <i>(2)</i>	Annual Median Wage <i>(3)</i>
00-0000	Total, All Occupations	3,162,331	3,387,402	225,071	7	381,204	\$45,650
11-0000	Management Occupations	174,376	190,237	15,861	9	15,846	\$106,810
13-0000	Business and Financial Operations Occupations	195,982	213,826	17,844	9	17,827	\$67,560
15-0000	Computer and Mathematical Occupations	86,039	101,367	15,328	18	7,007	\$82,160

17-0000	Architecture and Engineering Occupations	54,757	62,553	7,796	14	4,577	\$77,580
19-0000	Life, Physical, and Social Science Occupations	24,645	27,856	3,211	13	2,488	\$63,440
21-0000	Community and Social Service Occupations	44,771	48,203	3,432	8	4,256	\$49,590
23-0000	Legal Occupations	17,175	17,600	425	3	1,126	\$69,280
25-0000	Educational Instruction and Library Occupations	186,555	197,247	10,692	6	18,030	\$49,580
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	43,787	47,794	4,007	9	4,847	\$50,450
29-0000	Healthcare Practitioners and Technical Occupations	186,217	203,939	17,722	10	12,378	\$77,320
31-0000	Healthcare Support Occupations	143,102	160,520	17,418	12	23,501	\$33,180
33-0000	Protective Service Occupations	54,348	55,201	853	2	6,814	\$47,940
35-0000	Food Preparation and Serving Related Occupations	231,241	251,889	20,648	9	47,135	\$27,930
37-0000	Building and Grounds Cleaning and Maintenance Occupations	96,013	104,115	8,102	8	14,226	\$32,500
39-0000	Personal Care and Service Occupations	79,968	91,945	11,977	15	15,823	\$29,890
41-0000	Sales and Related Occupations	275,815	289,323	13,508	5	37,993	\$35,310
43-0000	Office and Administrative Support Occupations	373,142	361,297	-11,845	-3	40,893	\$40,250
45-0000	Farming, Fishing, and	26,903	27,882	979	4	4,108	\$36,750

	Forestry Occupations						
47-0000	Construction and Extraction Occupations	125,451	140,230	14,779	12	12,623	\$57,760
49-0000	Installation, Maintenance, and Repair Occupations	120,515	133,146	12,631	11	12,170	\$51,430
51-0000	Production Occupations	328,348	338,423	10,075	3	36,404	\$43,560
53-0000	Transportation and Material Moving Occupations	293,181	322,809	29,628	10	41,131	\$38,700

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

(3) Wage estimates from the Occupational Employment and Wage Statistics (OES) survey – May 2022

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

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, and IT industries contain some of the top hot job clusters in the state.

Table 3: Wisconsin Hot Jobs, Long-Term Occupational Employment Projections, 2022-2032

Rank	SOC Code	Occupation Title	Employment (2022)	Projected Employment (2032)	Numeric Change	Percent Change	Annual Total Openings	Typical education needed for entry
1	53-3032	Heavy and Tractor-Trailer Truck Drivers	52,252	56,184	3,932	8	6,023	Postsecondary non-degree award
2	41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and	36,752	39,756	3,004	8	3,664	High school diploma or equivalent

		Scientific Products						
3	49-9071	Maintenance and Repair Workers, General	32,215	34,971	2,756	9	3,289	High school diploma or equivalent
4	11-1021	General and Operations Managers	32,975	35,821	2,846	9	2,989	Bachelor's degree
5	47-2061	Construction Laborers	23,618	27,587	3,969	17	2,574	No formal educational credential
6	13-2011	Accountants and Auditors	27,816	30,287	2,471	9	2,460	Bachelor's degree
7	41-3091	Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	19,617	21,438	1,821	9	2,098	High school diploma or equivalent
8	51-4121	Welders, Cutters, Solderers, and Brazers	18,926	20,690	1,764	9	2,088	High school diploma or equivalent
9	49-9041	Industrial Machinery Mechanics	16,968	21,219	4,251	25	1,893	High school diploma or equivalent
10	47-2031	Carpenters	18,625	21,036	2,411	13	1,865	High school diploma or equivalent
11	15-1252	Software Developers	19,272	25,275	6,003	31	1,779	Bachelor's degree
12	13-1161	Market Research Analysts and Marketing Specialists	14,506	17,077	2,571	18	1,671	Bachelor's degree
13	13-1071	Human Resources Specialists	17,357	18,932	1,575	9	1,641	Bachelor's degree
14	47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	16,355	18,313	1,958	12	1,560	High school diploma or equivalent

15	13-1082	Project Management Specialists	17,038	19,312	2,274	13	1,480	Bachelor's degree
16	13-1111	Management Analysts	14,353	16,440	2,087	15	1,447	Bachelor's degree
17	49-3023	Automotive Service Technicians and Mechanics	14,407	15,516	1,109	8	1,371	Postsecondary non-degree award
18	53-1047	FirstLine Supervisors of Transportation & Material Moving Workers, Exc Aircraft Cargo Handling Supervisor	11,785	12,769	984	8	1,318	High school diploma or equivalent
19	47-2111	Electricians	12,042	13,706	1,664	14	1,288	High school diploma or equivalent
20	15-1232	Computer User Support Specialists	12,830	14,002	1,172	9	998	Some college, no degree
21	11-3031	Financial Managers	9,840	11,802	1,962	20	916	Bachelor's degree
22	17-2112	Industrial Engineers	11,776	13,834	2,058	17	905	Bachelor's degree
23	41-3021	Insurance Sales Agents	9,077	10,314	1,237	14	889	High school diploma or equivalent
24	47-2073	Operating Engineers and Other Construction Equipment Operators	8,753	9,849	1,096	13	887	High school diploma or equivalent
25	11-9051	Food Service Managers	7,200	7,786	586	8	885	High school diploma or equivalent
26	15-1211	Computer Systems Analysts	11,459	13,113	1,654	14	881	Bachelor's degree
27	25-1071	Health Specialties Teachers, Postsecondary	7,302	9,026	1,724	24	807	Doctoral or professional degree

28	21-1018	Substance Abuse, Behavioral Disorder, and Mental Health Counselors	7,437	8,629	1,192	16	779	Bachelor's degree
29	47-2152	Plumbers, Pipefitters, and Steamfitters	7,610	8,377	767	10	758	High school diploma or equivalent
30	11-9021	Construction Managers	8,039	9,413	1,374	17	751	Bachelor's degree
31	27-3031	Public Relations Specialists	8,181	8,922	741	9	744	Bachelor's degree
32	17-2141	Mechanical Engineers	9,346	10,963	1,617	17	713	Bachelor's degree
33	13-1151	Training and Development Specialists	7,585	8,157	572	8	709	Bachelor's degree
34	41-9022	Real Estate Sales Agents	6,864	7,546	682	10	665	High school diploma or equivalent
35	49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	6,501	7,343	842	13	658	Postsecondary non-degree award
36	29-2010	Clinical Laboratory Technologists and Technicians	7,712	8,820	1,108	14	635	Bachelor's degree
37	11-3021	Computer and Information Systems Managers	6,223	7,442	1,219	20	558	Bachelor's degree
38	11-3051	Industrial Production Managers	7,117	7,677	560	8	551	Bachelor's degree
39	11-9111	Medical and Health Services Managers	5,194	6,519	1,325	26	537	Bachelor's degree
40	29-1171	Nurse Practitioners	4,947	7,481	2,534	51	528	Master's degree

41	41-3031	Securities, Commodities, and Financial Services Sales Agents	6,003	6,656	653	11	527	Bachelor's degree
42	13-2052	Personal Financial Advisors	5,954	7,170	1,216	20	525	Bachelor's degree
43	27-1024	Graphic Designers	5,622	6,121	499	9	518	Bachelor's degree
44	11-2022	Sales Managers	6,144	6,661	517	8	516	Bachelor's degree
45	41-4011	Sales Representatives, Wholesale and Manufacturing, Technical and Scientific Products	4,620	5,329	709	15	509	Bachelor's degree
46	17-2051	Civil Engineers	5,975	7,114	1,139	19	497	Bachelor's degree
47	13-1121	Meeting, Convention, and Event Planners	3,835	4,353	518	14	476	Bachelor's degree
48	11-3012	Administrative Services Managers	5,223	5,688	465	9	463	Bachelor's degree
49	13-1081	Logisticians	4,083	5,031	948	23	455	Bachelor's degree
50	15-1254	Web Developers	5,128	6,173	1,045	20	451	Bachelor's degree

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. **Total Openings.** Includes exits, transfers, and growth.
3. **Typical Education needed for entry.** What most workers need to enter the occupation.

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

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions, including for populations with barriers to employment described in the first paragraph of Section II. Analysis must include—

I. EMPLOYMENT AND UNEMPLOYMENT

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

II. LABOR MARKET TRENDS

Provide an analysis of key labor market trends, including across existing industries and occupations.

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

Provide an analysis of the educational and skill levels of the workforce.

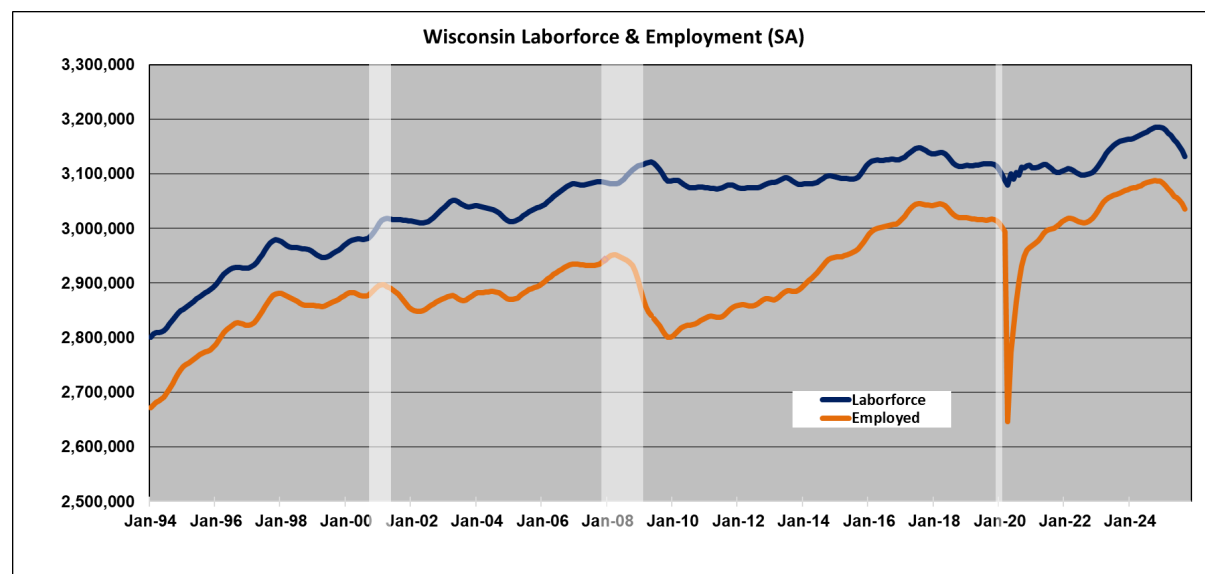
IV. COMPARISON OF ECONOMIC AND WORKFORCE ANALYTICAL CONCLUSION. DESCRIBE AREAS OF OPPORTUNITY FOR MEETING HIRING, EDUCATION, AND SKILLS NEEDS IDENTIFIED IN THE ECONOMY COMPARED TO THE ASSETS AVAILABLE IN THE LABOR FORCE IN THE STATE.

Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state.

Labor Force and Employment

Wisconsin's labor force and employment increased through 2023 and 2024 (Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics (LAUS)). Average monthly gains in labor force and employment in 2023 were 4,200 and 3,300, respectively. Growth rates slowed in 2024, with average monthly gains of 1,800 (labor force) and 1,200 (employment). Both labor force and employment experienced declines in 2025 (Figure 1).

Figure 1: Wisconsin's Labor Force and Employment



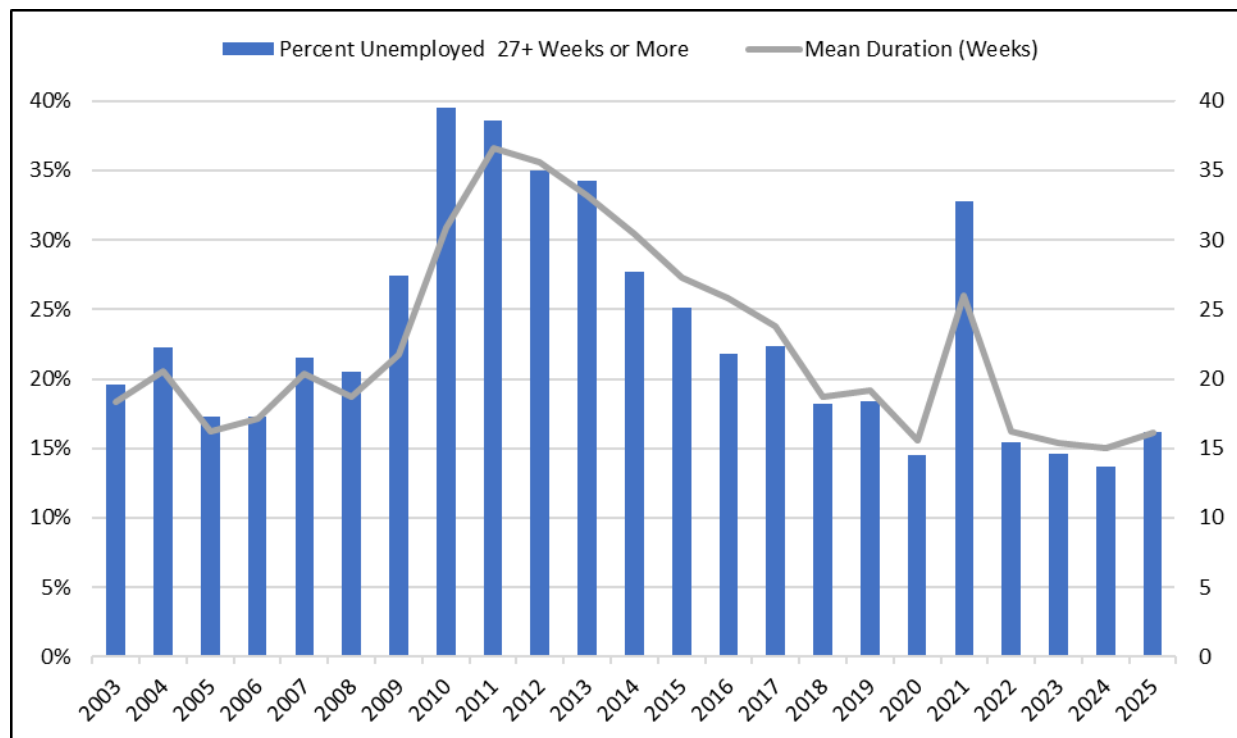
Source: Office of Economic Advisors, Wisconsin Department of Workforce Development

Unemployment

Based on 2025 Current Population Survey data (11 month average, no October 2025), there were 106,300 unemployed people in Wisconsin. Out of that total, 39,300 people were unemployed less than five weeks, 30,700 people were unemployed between five and 14 weeks, 19,100 people were unemployed between 15 and 26 weeks, and 17,200 people were unemployed 27 weeks or more.

Per the figure 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. There was slight uptick in the long-term unemployed share in 2025 relative to 2022-2024.

Figure 2: Annual Average Share of Long-Term Unemployed, Duration of Unemployment



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

Individuals with Barriers

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

Table 4: WIOA Identified Barriers to Employment – WI Individuals

Population/Barrier	WIOA Reference	Individuals in WI	Source
Low-Income Individuals (Defined as having income below the federal poverty level)	WIOA Sec. 3(24)(B)	601,246	2024 American Community Survey, Table S1701
American Indians or Alaska Natives ((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)	48,384	2024 American Community Survey, Table DP05
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)	1,892	2024 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)	62,978	2024 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)	369,760	2024 American Community Survey, Table S18120
Older Individuals (Individuals who are age 55 or older)	WIOA Sec. 3(24)(E)WIOA Sec. 3(39)	1,960,434	2024 American Community Survey Table S0101
Homeless Individuals	WIOA Sec. 3(24)(G)	5,049, with 38% a part of families	2024 HUD Annual Homeless Assessment Report (AHAR)
Youth who were in out-of-home care (As of Dec. 31, 2024)	WIOA Sec. 3(24)(H)	1,091 children aged 15 or older	2024 Wisconsin Department of Children and Families Out-of-Home Care Report

Population/Barrier	WIOA Reference	Individuals in WI	Source
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)	192,370	2024 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)	6,232	2025 Migrant and H-2A Worker Population Report, WI DWD
Individuals within two years of exhausting lifetime eligibility for Temporary Assistance for Needy Families (aka TANF)	WIOA Sec. 3(24)(K)	Wisconsin averaged 23,525 Temporary Assistance for Needy Families (TANF) participants (during fiscal year 2024)	U.S. HHS Administration for Children and Families
Long-Term Unemployed Individuals (those who have been unemployed for 27 consecutive weeks or more)	WIOA Sec. 3(24)(L)	17,200	2025 Current Population Survey (no Oct 2025 data)
Refugees (Individuals the Refugee Services Program served in Employment and Training Activities, FFY 2021 and 2022)	WIOA Sec. 3(24)(N)	1,723	Wisconsin Department of Children and Families

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 759,018 individuals in the civilian, non-institutionalized population in Wisconsin that self-identify as having a significant disability, according to the 2024 American Community Survey. Slightly under half of these individuals (369,760) are of working age, defined as between the ages of 18 and 64. This constitutes 10.5 percent of the state's total working age population. Of this number, 191,742 individuals are employed and an additional 16,426 reported being unemployed. This results in a 7.9 percent unemployment rate within this group – a rate that is over double the overall age 18 to 64 unemployment rate over the same period. This leaves 161,592 individuals with a disability unattached to the labor force. The most common disabilities for those not in the labor force are ambulatory (86,646); independent living (86,516); and cognitive (82,862) disabilities. Respondents can identify more than one disability.

These figures result in a 54.2 percent labor force participation rate for the disabled population, significantly lower than Wisconsin's rate of 82.7 percent for the 18 to 64 age group.

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 2024 American Community Service data, there are 272,410 military veterans in Wisconsin. Nearly 90 percent of veterans are White, four percent are Black, and about three percent are Hispanic or Latino with other races making up the remaining percent. Males account for 91 percent while females account for 9 percent. Thirty-eight percent of veterans are between the ages 35 and 64.

There are 122,747 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 slightly lower than that of the overall population (2.8 percent compared to 3 percent – 2024 American Community Survey), though the labor force participation rate is about three percentage points lower.

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 March 14, 2025, the Wisconsin Department of Corrections (DOC) has nearly 23,000 Persons in Care. This population averages 41 years of age. Sixty-five percent currently has less than five years of prison time remaining. Seventy-five percent 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 2024, 340,689 (10 percent) in Wisconsin in this age group lived in poverty, compared to 428,177 (12.3 percent) in 2010. Despite this 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 WIOA 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.

Characteristics of Those Not in the Labor Force

According to 2025 Current Population Survey data (11 month average, no October 2025), 1.73 million or 35.7% of the Wisconsin civilian, non-institutionalized population aged 16 and over did not participate in the labor market. The large majority of this population (94.6%) 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 206,200 residents between the ages of 16 and 24 (many of whom are full-time students), 293,700 residents between the ages of 25 and 54, and 1,232,700 residents aged 55 and over. Thus, 71.1% of the non-participating total are aged 55 and over.

**Table 5: Civilians not in the labor force by sex and age, January 2025-December 2025
(based on CPS, no October 2025 data) (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	1732.6	206.2	293.7	1232.7	782.4	950.2
Do not want a job now	1638.4	174.7	259.8	1204.0	747.6	890.8
Want a job	94.2	31.5	34.0	28.7	34.8	59.4
Did not search for work in previous year	61.6	18.5	19.7	23.4	24.5	37.1
Not available to work now	9.5	4.9	3.2	1.4	2.9	6.5
Available to work now	23.1	8.1	11.2	3.9	7.4	15.8
Reason not currently looking:						
Discouragement over job prospects	3.8	0.7	2.5	0.6	0.9	2.9
Reasons other than discouragement	19.4	7.4	8.6	3.3	6.5	12.9

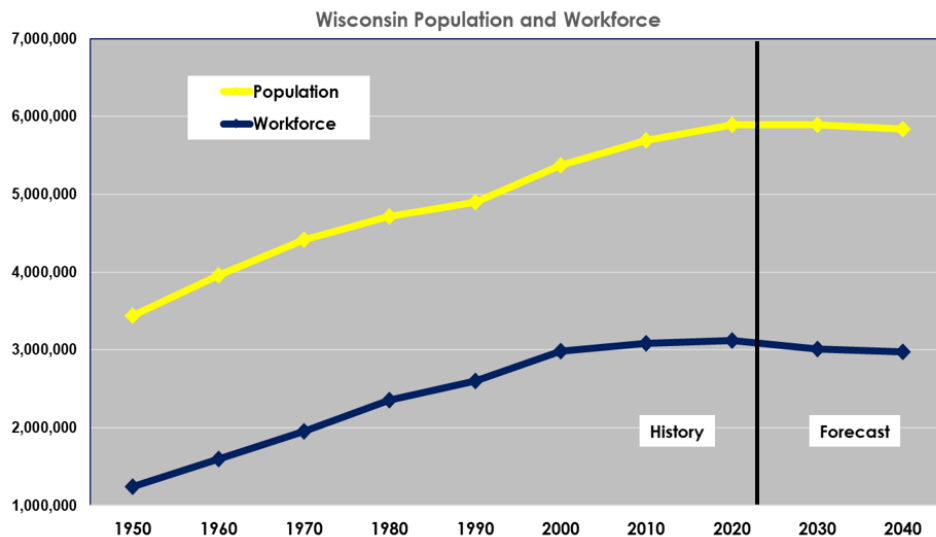
Source: Office of Economic Advisors, Wisconsin Department of Workforce Development

Employment Outlook

[The Wisconsin Department of Revenue](#) forecasts minimal state job growth through 2028, with Education and Health Services expected to be the main source of gains. Workforce quantity remains a primary factor impacting Wisconsin's economic future. The demographic dynamics facing the state, other upper-Midwest states, the U.S., and most developed economies will advance unaltered in the coming decades and continue to create employment challenges.

The Wisconsin Department of Administration (DOA) published [population projections](#) in 2024 that incorporate counts from the 2020 Decennial Census. Wisconsin's population growth is expected to be near zero from 2020-2030, while a decline of 0.8% is projected from 2030 to 2040. The percentage of Wisconsin's population 65 years and older was 18.0% in 2020, and that percentage is expected to increase to 22.8% in 2030. Meanwhile, the percentage of the population age 25-64 decreases from 51.1% in 2020 to a projected 47.7% in 2030. The number of Wisconsinites age 25-64 is expected to decline by nearly 200,000 from 2020 to 2030. Reflective of this population backdrop, DWD's Office of Economic Advisors projects the state's labor force to decline from 3,118,600 in 2020 to 3,011,000 in 2030 (Figure 3).

Figure 3: Wisconsin Population and Labor Force



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

Despite the current projections, addressing various barriers that Wisconsinites face may boost labor force participation in the state. Childcare affordability remains a prevalent issue. According to the [Wisconsin Department of Children and Families](#), the average price of center-based child care of one infant exceeds \$11,900 per year – equivalent to about 16 percent of median household income in the state. Survey research from the [Wisconsin Institute of Research on Poverty](#) shows that in June of 2025, approximately half of all surveyed respondents reported that someone in their family missed at least one day of work or school in the previous year due to childcare. Just over 12 percent reported leaving the workforce due to issues with childcare. This was more common among females and non-white Hispanic individuals, as well as for respondents with children six years or under and those with household incomes below seventy thousand.

Another prevalent challenge to the state workforce is housing affordability. According to the [Wisconsin Policy Forum](#), the median sales price of homes in Wisconsin increased by over 50 percent between 2017 to 2022, while the state's median household income increased by only 20 percent. Data from the 2024 American Community Survey indicate that just over 42 percent of renter households in the state are classified as cost-burdened, spending at least 30 percent of income on housing.

Education and Skill Levels of the Workforce

For job openings in the state to be filled, worker skills must align with the skills demanded by Wisconsin's employers. 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.

Table 6 shows 2024 ACS data on statewide educational attainment by major age cohorts.

Table 6: Wisconsin Population Educational Attainment

Population 18 to 24 years	555,061	
Less than high school graduate	49,169	8.9%
High school graduate (includes equivalency)	218,083	39.3%
Some college or associate's degree	206,144	37.1%

Bachelor's degree or higher	81,665	14.7%
Population 25 years and over	4,172,638	
Less than 9th grade	99,085	2.4%
9th to 12th grade, no diploma	163,198	3.9%
High school graduate (includes equivalency)	1,202,481	28.8%
Some college, no degree	781,284	18.7%
Associate's degree	484,694	11.6%
Bachelor's degree	943,201	22.6%
Graduate or professional degree	498,695	12.0%
High school graduate or higher	3,910,355	93.7%
Bachelor's degree or higher	1,441,896	34.6%
Population 25 to 34 years	757,466	
High school graduate or higher	720,433	95.1%
Bachelor's degree or higher	309,139	40.8%
Population 35 to 44 years	761,404	
High school graduate or higher	706,573	92.8%
Bachelor's degree or higher	300,184	39.4%
Population 45 to 64 years	1,482,726	
High school graduate or higher	1,388,545	93.6%
Bachelor's degree or higher	503,620	34.0%
Population 65 years and over	1,171,042	
High school graduate or higher	1,094,804	93.5%
Bachelor's degree or higher	328,953	28.1%

Source: U.S. Census Bureau, 2024 American Community Survey 1-Year Estimates (Table S1501)

Table 7 breaks down DWD's long-term employment projections by typical education for entry.

Table 7: Typical Education for Entry Totals and Percent by Education Type 2022-2032

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

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

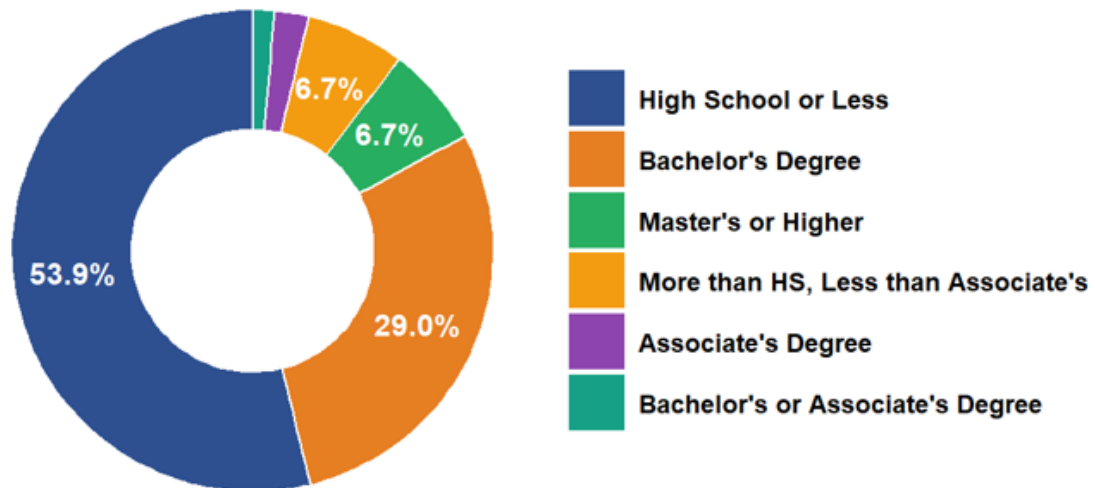
Typical Education for Entry	# Jobs - 2022	Percent of Total Job Base - 2022	# Jobs - 2032	Percent of Total Job Base - 2032	Numeric Change (2022 - 2032)	Percent Change (2022 - 2032)
No formal educational credential	681,873	21.60	732,090	21.64	50,217	7.36
High school diploma or equivalent	1,324,775	41.96	1,395,753	41.26	70,978	5.36
Some college, no degree	85,995	2.72	87,131	2.58	1,136	1.32
Postsecondary non-degree award	197,435	6.25	211,327	6.25	13,892	7.04
Associate's degree	64,108	2.03	69,202	2.05	5,094	7.95
Bachelor's or associate degree	62,255	1.97	65,565	1.94	3,310	5.32
Bachelor's degree	613,252	19.42	678,517	20.06	65,265	10.64
Master's degree	48,506	1.54	55,279	1.63	6,773	13.96
Doctoral or professional degree	79,321	2.51	87,641	2.59	8,320	10.49
Total Job Base	3,157,520	100	3,382,505	100	224,985	7.13

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

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

Figure 4 shows the composition of projected annual growth in openings by education needed for entry.

Figure 4: Education Needed for Entry: Annual Growth Openings 2022-2032– Percent of Total



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

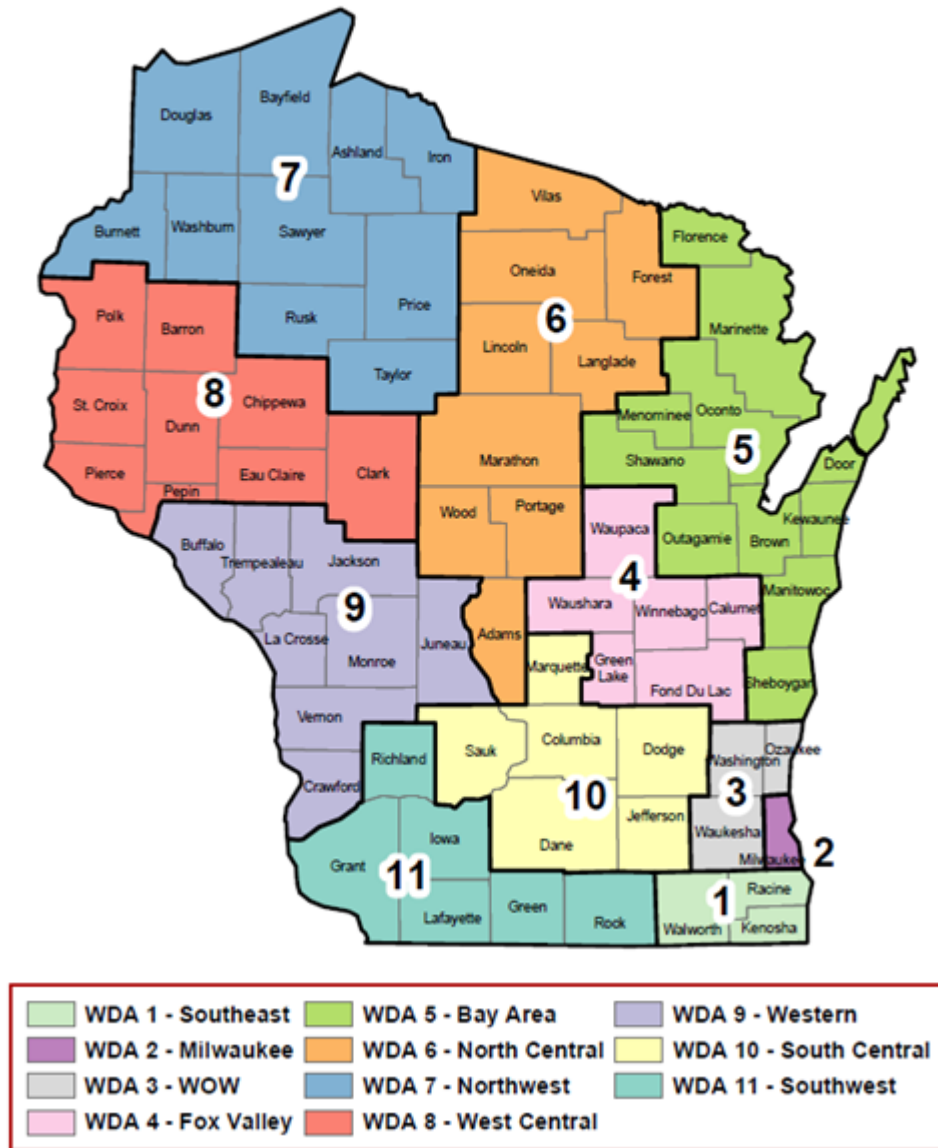
The apparent 'skills gaps' is a two-part challenge for the state. Firstly, Wisconsin is facing a worker quantity challenge. Secondly, the worker quantity challenge foretells the 'skills gap' challenge; without enough workers, all industries and occupations will have too few appropriately skilled job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

Details on Wisconsin's strategic goals to address these challenges and how WIOA core and Combined State Plan partner programs can achieve these goals are provided after the regional analysis section.

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



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. Although it encompasses a large geographical area, the Bay Area WDA is not the most populous WDA, nor does it contain the largest labor force or job base. Further, because of its large expanse, changes in the labor force, jobs, wages, and income will vary, sometimes significantly, from one county to the next.

Labor Force (LAUS)

	2024	2023	Percentage Change
Labor Force	454,448	449,674	1.1%
Employed	442,103	438,079	0.9%
Unemployed	12,345	11,595	6.5%
Unemployment Rate	2.7%	2.6%	3.8%

In calendar year 2024, Bay Area's labor force totaled 454,448 participants consisting of 442,103 employed and 12,345 unemployed. From 2023 to 2024, the labor force grew by 4,774 participants: a 1.06% increase. While the number of employed rose by 0.92% over the year, the number of unemployed rose by 6.47%.

The Bay Area's unemployment rate was 2.7% in 2024; a 0.1 percentage point increase from 2023. This rate was lower than the statewide rate of 3.0%. Generally, the Bay Area 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). The Bay Area's LFPR in 2024 was 66.0%. The regional LFPR increased by 0.1% relative to 2023.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	423,959	420,064	0.9%	0.7%
Natural Resources & Mining	6,815	6,710	1.6%	2.3%
Construction	23,955	23,362	2.5%	2.7%
Manufacturing	93,054	92,897	0.2%	-1.9%
Trade, Transportation, Utilities	79,842	80,113	-0.3%	0.5%
Information	3,288	3,210	2.4%	0.1%
Financial Activities	18,981	19,409	-2.2%	0.5%
Professional & Business Services	38,710	39,521	-2.1%	0.1%
Education & Health Services	86,625	84,513	2.5%	2.7%
Leisure and Hospitality	44,266	43,099	2.7%	2.5%

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Other Services	11,397	10,837	5.2%	3.7%
Public Administration	16,418	15,668	4.8%	4.4%

In calendar year 2024, the total job base in the Bay Area region numbered 423,959 jobs: 3,895 greater than 2023.

The **Education and Health Services** supersector saw the largest numerical job increase in the Bay Area, up 2,112 jobs over the year (2.50%). In addition, the Leisure and Hospitality (+1,167 jobs, 2.71%) and **Public Administration** (+750 jobs, 4.79%) sectors were also among the fastest growing industries in the Bay Area over the course of 2024. Employment in the Bay Area's largest supersector, **Manufacturing**, experienced an increase of 157 jobs (0.17%). Net job losses were present in industries such as **Professional and Business Services** (811 jobs, -2.05%) and **Financial Activities** (428 jobs, -2.21%).

Total area wages increased from \$24.2 billion in 2023 to \$25.4 billion in 2024. These \$1.2 billion (4.86%) increases were greater than the statewide rate of 4.73%. Construction (+7.98%) is an additional industry that experienced relatively high total wage growth in 2024. No industries experienced an annual decline in total wages.

Fox Valley WDA

The Fox Valley 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 fourth lowest unemployment rate and seventh highest labor force participation rate. Many of the region's urban cores are situated along the I-41 highway corridor, wholly containing two Metropolitan Statistical Areas (MSA) - Oshkosh-Neenah and Fond du Lac, while Calumet County is included as part of the Appleton MSA.

Labor Force (LAUS)

	2024	2023	Percentage Change
Labor Force	226,669	225,726	0.4%
Employed	220,418	220,051	0.2%
Unemployed	6,251	5,675	10.1%
Unemployment Rate	2.8%	2.5%	12.0%

In calendar year 2024, Fox Valley's labor force totaled 226,669 participants, consisting of 220,418 employed and 6,251 unemployed. From 2023 to 2024, the labor force grew by 943 participants: a 0.42% increase. While the number of employed rose by 0.17% over the year, the number of unemployed rose by 10.15%.

The Fox Valley's unemployment rate was 2.8% in 2024; a 0.3 percentage point increase from 2023. This rate was lower than the statewide rate of 3.0%. Generally, the Fox Valley region experiences a lower unemployment rate than that seen statewide.

The Fox Valley's LFPR in 2024 was 65.5%. The regional LFPR decreased by 0.2% relative to 2023.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	185,250	185,268	0.0%	0.7%
Natural Resources & Mining	3,492	3,427	1.9%	2.3%
Construction	10,861	10,967	-1.0%	3.4%
Manufacturing	42,261	43,581	-3.0%	-1.9%
Trade, Transportation, Utilities	32,434	32,767	-1.0%	0.5%
Information	198	217	-8.8%	0.1%
Financial Activities	7,582	7,438	1.9%	0.5%
Professional & Business Services	7,735	17,359	2.2%	0.1%
Education & Health Services	36,139	35,716	1.2%	2.70%
Leisure and Hospitality	16,846	16,463	2.3%	2.5%
Other Services	740	698	6.0%	3.7%
Public Administration	9,037	8,768	2.9%	4.4%

In calendar year 2024, the total job base in the Fox Valley region numbered 185,250 jobs; 18 fewer jobs than in 2023.

The **Education and Health Services** supersector saw the largest numerical job increase in the Fox Valley, up 423 jobs over the year (1.17%). In addition, the **Leisure and Hospitality** (+385 jobs, 2.29%) and **Professional and Business Services** (+376 jobs, 2.12%) sectors were also among the fastest growing industries in the Fox Valley over the course of 2024. Employment in the Fox Valley's largest supersector, **Manufacturing**, experienced the greatest employment decline in the region (1,320 jobs, 3.12%). Net job losses were also present in industries such as **Trade, Transportation, Utilities** (333 jobs, 1.03%) and **Construction** (106 jobs, 0.98%).

Total area wages increased from \$10.5 billion in 2023 to \$11.0 billion in 2024. Area wages grew by \$513 million (4.89%) from 2023 to 2024; this rate was greater than the statewide rate of 4.73%. **Financial Activities** (+7.58%) is an additional industry that experienced relatively high total wage growth in 2024. No industries experienced an annual decline in total wages.

Milwaukee WDA

The Milwaukee WDA 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)

	2024	2023	Percentage Change
Labor Force	464,762	461,749	0.7%
Employed	447,437	445,787	0.4%
Unemployed	17,325	15,982	8.5%
Unemployment Rate	3.7%	3.5%	5.7%

In calendar year 2024, Milwaukee's labor force totaled 464,762 participants consisting of 461,749 employed and 17,325 unemployed. From 2023 to 2024, the labor force gained 3,013 participants: a 0.7% increase. While the number of employed rose by 0.4% over the year, the number of unemployed rose by 8.5%.

The Milwaukee area's unemployment rate was 3.7% in 2024; a 0.2 percentage point increase from 2023. This rate was higher than the statewide rate of 3.0%. Generally, the single-county WDA experiences a higher unemployment rate than that seen statewide.

Milwaukee's LFPR in 2024 was 62.6%. The regional LFPR decreased by 0.1% relative to 2023.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	468,915	467,332	0.3%	0.7%
Natural Resources & Mining	83	85	-2.4%	2.3%
Construction	13,398	12,816	4.5%	3.4%
Manufacturing	47,204	48,082	-1.8%	-1.9%
Trade, Transportation, Utilities	76,503	77,158	-0.8%	0.5%
Information	7,799	8,049	-3.1%	0.1%
Financial Activities	28,252	28,709	-1.6%	0.5%
Professional & Business Services	70,005	70,594	-0.8%	0.1%

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Education & Health Services	140,443	139,307	0.8%	2.70%
Leisure and Hospitality	51,199	49,809	2.8%	2.5%
Other Services	13,831	13,506	2.4%	3.7%
Public Administration	20,198	19,218	5.1%	4.4%

In calendar year 2024, the total job base in the Milwaukee region numbered 468,915 jobs; 1,583 more jobs than in 2023, up 0.3%. The **Leisure & Hospitality** supersector saw the largest numeric increase with 1,390 additional jobs over the year: up 2.8%. **Construction** increased at the fastest rate with growth of 4.5%, or 582 additional jobs.

Total area wages increased from \$31.0 billion in 2023 to over \$32.4 billion in 2024, an increase of \$1.5 billion (4.7%); this rate matched the statewide rate.

Additional industries that experienced relatively high total wage gains include **Public Administration** (+10.9%) and **Educational and Health Services** (+5.8%). **Natural Resources & Mining** was the only industry to measure a decline in total wages (-1.4%).

North Central WDA

The North Central 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)

	2024	2023	Percentage Change
Labor Force	215,287	213,732	0.7%
Employed	208,663	207,405	0.6%
Unemployed	6,324	6,327	4.7%
Unemployment Rate	3.1%	3.0%	3.3%

In calendar year 2024, North Central's labor force totaled 215,287 participants consisting of 208,663 employed and 6,624 unemployed. From 2023 to 2024, the labor force increased by 1,555 participants; a 0.7% increase. The number of employed increased by 0.6% over the year and the number of unemployed increased by 4.7% over the year.

The North Central region's unemployment rate was 3.1% in 2024, up from 3.0% in 2023. This rate was higher than the statewide unemployment rate of 3.0%. Generally, the North Central region generally experiences a higher unemployment rate than that seen statewide.

North Central Wisconsin's LFPR in 2024 was 61.5%, sitting well below the state's LFPR of 65.5%. The region's LFPR decreased by 0.1% relative to 2023, continuing the trend of declining rates over

time. This long-term trend is expected to continue as the baby boomer population continues to age, applying a downwards pressure on the rate.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	189,759	188,988	0.4%	0.7%
Natural Resources & Mining	3,902	3,689	5.8%	2.3%
Construction	8,786	8,299	5.9%	3.4%
Manufacturing	33,701	34,322	-1.8%	-1.9%
Trade, Transportation, Utilities	41,028	40,998	0.1%	0.5%
Information	2,216	2,292	-3.3%	0.1%
Financial Activities	12,266	12,250	-0.2%	0.5%
Professional & Business Services	12,508	12,967	-3.5%	0.1%
Education & Health Services	39,627	39,413	0.5%	2.70%
Leisure and Hospitality	21,134	20,547	2.9%	2.5%
Other Services	5,011	4,874	2.8%	3.7%
Public Administration	9,586	9,299	3.1%	4.4%

In calendar year 2024, the total job base in the North Central region numbered 189,759 jobs; 771 more jobs than in 2023. From 2023 to 2024, employment in the region grew by 0.4%. This growth was outpaced by the statewide growth rate of 0.7%.

Construction experienced the greatest proportional gain in jobs, growing at a rate of 5.9% over the year. Statewide, **Construction** grew at a slower rate of 3.4%. Four industries recorded declines in employment in the region. **Professional & Business Services** experienced the greatest proportional loss of jobs, decreasing by 3.5% over the year. Statewide, this industry grew by 0.1%.

Total wages in North Central increased from 10.2 billion in 2023 to 10.5 billion in 2024. Total wages grew by 294.9 million (2.9%) over the year, growing at a slower pace than statewide wages (4.7%). The fastest growth in total wages by industry occurred in **Construction**, growing at a rate of 11.0%. Statewide, **Construction** grew at a slower rate of 7.8%. North Central's average annual wages were highest in **Financial Activities** (\$67,413), **Construction** (\$61,297), and **Manufacturing** (\$59,003). In North Central, average annual wages for these industries grew by 1.1%, 6.8%, and 3.0% respectively over the year. Statewide, average annual wages for these industries grew by 4.7%, 4.3%, and 4.0% respectively over the year.

Northwest WDA

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

Labor Force (LAUS)

	2024	2023	Percentage Change
Labor Force	87,404	86,969	0.5%
Employed	83,920	83,570	0.4%
Unemployed	3,484	3,399	2.5%
Unemployment Rate	4.0%	3.9%	2.6%

The 2024 LFPR in the Northwest WDA was 57.5%, down 4.2% from 2014. This was larger than the state's overall 2.8% decrease in LFPR over the same period. In 2024, the Northwest WDA had by far the lowest LFPR of any WDA in Wisconsin, 4.0% lower than the second lowest WDA and 8.0% lower than Wisconsin as a whole.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	64,995	64,948	0.1%	0.7%
Natural Resources & Mining	1,054	1,031	2.2%	2.3%
Construction	3,286	3,318	-1.0%	3.4%
Manufacturing	11,218	11,607	-3.4%	-1.9%
Trade, Transportation, Utilities	12,940	12,917	0.2%	0.5%
Information	505	493	2.4%	0.1%
Financial Activities	1,969	2,032	-3.1%	0.5%
Professional & Business Services	3,418	3,384	1.0%	0.1%
Education & Health Services	13,763	13,744	0.1%	2.70%
Leisure and Hospitality	8,597	8,341	3.1%	0.96%
Other Services	1,621	1,595	1.6%	3.7%
Public Administration	6,630	6,471	2.5%	4.4%

The covered employment in the Northwest WDA region was 64,995 in 2024, representing 2.2% of the overall jobs in the state. This is a small decrease over the region's 2023 percentage of overall jobs. The three largest supersectors in terms of employment *are Education & Health Services, Trade, Transportation, Utilities, and Manufacturing*. These three industries represent 58.3% of all jobs in Northwest Wisconsin. Two of the three saw an increase in employment from 2023 to 2024. *Education & Healthcare* had an employment increase of 21 0.1%. *Trade, Transportation, Utilities* increased 0.2%. *Manufacturing* decreased 3.4%. The industry supersector that saw the largest employment growth was *Leisure & Hospitality*, with a 3.1% increase.

From 2023 to 2024, overall wages in Northwest Wisconsin grew 2.2%, which was slower than the state wages growth rate of 4.0%. All but two supersectors in the Northwest Wisconsin experienced positive wage growth. *Professional & Business Services* saw the largest percentage increase at 7.2%. *Natural Resources & Mining* wages grew 3.3%. *Construction* wages declined 8.7% and *Financial Activities* wages decreased 0.8%

South Central WDA

The South Central WDA is composed of six counties: Columbia, Dane, Dodge, Jefferson, Marquette, and Sauk. The economic center of this region is the city of Madison, the state's capital. The region includes a majority of the Madison MSA (Columbia, Dane, Iowa, and Green counties)

Labor Force (LAUS)

	2024	2023	Percentage Change
Labor Force	519,540	512,236	1.4%
Employed	506,838	500,626	1.2%
Unemployed	12,702	11,610	9.4%
Unemployment Rate	2.4%	2.3%	4.3%

The total number of South Central residents increased in 2024, adding to both employment and unemployment levels. However, the number of unemployed increased faster than the number of people in the labor force, which contributed to an increase in South Central WDA's unemployment rate of 0.1%.

The 2024 LFPR in the South Central WDA was 69.0%, a slight decrease of 0.1% from 2023. South Central continues to have the highest LFPR of all WDAs in the state. Much of this was driven by the high LFPR of Dane County, a county that has a young population.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	491,813	484,942	1.4%	0.7%
Natural Resources & Mining	5,426	4,267	3.0%	2.3%

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Construction	26,418	25,460	3.8%	3.4%
Manufacturing	57,267	59,146	-3.2%	-1.9%
Trade, Transportation, Utilities	77,703	77,419	0.4%	0.5%
Information	20,323	20,182	0.7%	0.1%
Financial Activities	25,469	25,823	-1.4%	0.5%
Professional & Business Services	55,871	56,034	-0.3%	0.1%
Education & Health Services	124,440	119,319	4.3%	2.70%
Leisure and Hospitality	53,195	52,140	2.0%	2.5%
Other Services	14,673	14,185	3.4%	3.7%
Public Administration	29,620	28,557	3.7%	4.4%

Total wages in the South Central WDA during 2024 totaled \$33.9 billion. This was an increase of 5.6% compared to the \$32.1 billion in 2023. This total wage growth outpaced the state's overall, which grew at a rate of 4.7%.

The largest sector, ***Education and Health Services***, was also the fastest growing in terms of employment in the South Central WDA. This WDA is home to the University of Wisconsin-Madison, the flagship institution of the Universities of Wisconsin, as well as several large medical institutions. This area's growth also outpaced the rate of growth for the state overall in this sector.

The second-largest sector, ***Professional and Business Services***, declined by 0.3%. In contrast, employment in this sector increased statewide. This could indicate that previous growth in this sector in the South Central area is diversifying geographically.

Last year, ***Information*** was the fastest-growing sector in terms of employment. In 2024, that sector only grew by 0.7%. This dramatic slowdown in hiring could reflect the changing hiring dynamics in industries like ***Information***, which are heavily affected by artificial intelligence technologies.

Southeastern WDA

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

Labor Force (LAUS)

	2024	2023	Percentage Change
Labor Force	258,414	254,313	1.6%
Employed	250,075	246,521	1.4%
Unemployed	8,339	7,792	7.0%
Unemployment Rate	3.2%	3.1%	3.2%

In calendar year 2024, Southeast's labor force totaled 258,414 participants consisting of 250,075 employed and 8,339 unemployed. From 2023 to 2024, the labor force gained 4,101 participants: a 1.6% increase. The number of employed rose by 1.4% over the year, while the number of unemployed rose by 7.0%.

The Southeast WDA unemployment rate was 3.2% in 2024; a 0.1 percentage point increase from 2023. This rate was higher than the statewide rate of 3.0%. Generally, this WDA experiences a slightly higher unemployment rate than that seen statewide, but follows similar trends. The LFPR for the WDA in 2024 was 67.4%, up 0.5% relative to 2023.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	195,861	191,975	2.0%	0.7%
Natural Resources & Mining	1,211	1,176	3.0%	2.3%
Construction	7,636	7,105	2.0%	0.7%
Manufacturing	36,155	36,354	-0.5%	-1.9%
Trade, Transportation, Utilities	47,783	47,156	1.3%	0.5%
Information	842	829	1.6%	0.1%
Financial Activities	5,301	5,035	5.3%	0.5%
Professional & Business Services	18,477	18,865	-2.1%	0.1%
Education & Health Services	40,612	39,283	3.4%	2.70%
Leisure and Hospitality	23,535	22,690	3.7%	2.5%

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Other Services	4,765	4,550	4.7%	3.7%
Public Administration	9,544	8,930	6.9%	4.4%

In calendar year 2024, the total job base in the Southeast region numbered 195,861 jobs: 3,886 more jobs than in 2023, up about 2.0%.

The **Education & Health Services** supersector saw an increase of 1,329 jobs over the year: up 3.4%, which was the largest numeric gain in the WDA. The **Public Administration** supersector had the highest growth rate (+4.4%). Notably, **Business Administration** lost the highest number of jobs (-388).

Total area wages increased from \$10.6 billion in 2023 to \$11.3 (5.8%). This rate was higher than the statewide rate of 4.7%. Total wages grew for all industry subsectors in the region. Additional industries that experienced relatively high total wage gains include **Construction** (+14.4%) and **Financial Activities** (+11.0%).

Southwest WDA

The Southwest WDA region is composed of six counties: Grant, Green, Iowa, Lafayette, Richland, and Rock. It borders Iowa and Minnesota to the west and Illinois to the south. The two largest cities in the region are Janesville and Beloit, both along the I-90 highway corridor leading towards Illinois. The western portion incorporates part of the broader Madison MSA (Green and Iowa counties) as well as the Janesville-Beloit MSA (Rock County).

Labor Force (LAUS)

	2024	2023	Percentage Change
Labor Force	167,184	165,205	1.2%
Employed	162,213	160,418	1.1%
Unemployed	4,971	4,787	3.8%
Unemployment Rate	3.0%	2.9%	3.4%

In calendar year 2024, the Southwest region's labor force totaled 167,184 individuals, 4,971 of whom were unemployed. From 2023 to 2024, the region's labor force grew by 1,979. Employment increased by 1,795 while unemployment increased by 184 individuals. As a result, the unemployment rate increased slightly to 3.0% in 2024, which matched Wisconsin's overall unemployment rate of roughly 3.0%.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	124,003	122,744	1.0%	0.7%
Natural Resources & Mining	2,681	2,662	0.7%	2.3%

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Construction	6,554	6,142	6.7%	3.4%
Manufacturing	22,802	22,913	-0.5%	-1.9%
Trade, Transportation, Utilities	29,989	29,739	0.8%	0.5%
Information	1,369	1,522	-10.1%	0.1%
Financial Activities	3,529	3,580	-1.4%	0.5%
Professional & Business Services	8,788	8,719	0.8%	0.1%
Education & Health Services	27,730	27,324	1.5%	2.70%
Leisure and Hospitality	11,388	11,253	1.2%	2.5%
Other Services	2,829	2,768	2.2%	3.7%
Public Administration	6,348	6,131	3.5%	4.4%

In calendar year 2024, the total employment in the Southwest WDA was 124,003 individuals, up 1,259 individuals from 2023. In both 2024 and 2023, the largest sector was **Trade, Transportation, Utilities**, accounting for 24.2% of overall employment in the region in 2024. From 2023 to 2024, this supersector saw employment increase of 250 individuals for a growth rate of 0.8%, outpacing the state overall. The fastest growing supersector in the region was **Construction**, which grew by 6.7%, adding 412 individuals. However, **Construction** accounted only for 5.3% of overall employment.

Total area wages increased from \$6.5 billion in 2023 to \$6.9 billion in 2024, growing at a rate of 4.9%. The **Information** supersector was the only supersector which experienced a decline in total wages from 2023 to 2024, which can be contributed to its 10.1% decrease in employment. **Information** was also the smallest industry in terms of employment, making it more susceptible to volatility.

West Central WDA

The West Central 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 highway 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)

	2024	2023	Percentage Change
Labor Force	270,196	266,997	1.2%
Employed	261,420	258,702	1.1%
Unemployed	8,776	8,295	5.8%
Unemployment Rate	3.2%	3.1%	3.2%

The LFPR for the West Central WDA was 66.8% during 2024. This is a slight decrease compared to its LFPR of 67.0% during 2023. Despite this decline, West Central's LFPR was higher than the state's LFPR of 65.5% in both years. The overall labor force in the area added 3,199 individuals during 2024, growing at a rate of 1.2%. All nine counties in the West Central WDA experienced an increase in the number of individuals employed and in the labor force. However, at 5.8% growth, the number of unemployed individuals grew at a faster rate than the labor force. Due to this, the unemployment rate in West Central increased slightly, going up by 0.1% from 3.1% to 3.2%.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	202,283	200,287	1.0%	0.7%
Natural Resources & Mining	3,256	3,210	1.4%	2.3%
Construction	9,651	9,224	4.6%	3.4%
Manufacturing	35,213	36,484	-3.5%	-1.9%
Trade, Transportation, Utilities	44,510	43,884	1.4%	0.5%
Information	1,445	1,397	3.4%	0.1%
Financial Activities	6,053	6,009	0.7%	0.5%
Professional & Business Services	15,213	15,549	-2.2%	0.1%
Education & Health Services	50,046	48,661	2.8%	2.70%
Leisure and Hospitality	21,690	21,190	2.4%	2.5%
Other Services	4,965	4,811	3.2%	3.7%
Public Administration	10,246	9,813	4.4%	4.4%

The West Central region added 1,996 employed individuals during 2024, for a growth rate of 1.0%. This outpaced the state's 0.7% growth rate of number of employed during that period. The

Education and Health Services sector remained the largest sector, accounting for 24.7% of all employed people in the area. Employment also grew at a rate of 2.8%, 0.1% higher than the state's growth rate in the sector. This sector has outpaced the state's growth during both 2024 and 2023. The average total monthly payroll in the region in 2024 was \$10.8 billion, up 4.1% from 2023.

Western WDA

The Western WDA includes eight counties: Buffalo, Crawford, Jackson, Juneau, La Crosse, Monroe, Trempealeau, and Vernon. Within this region lies the La Crosse-Onalaska MSA, which contains La Crosse County in Wisconsin and Houston County in Minnesota. However, Houston County is not part of the Western WDA regional data.

Labor Force (LAUS)

	2024	2023	Percentage Change
Labor Force	155,272	154,100	0.8%
Employed	150,754	149,792	0.6%
Unemployed	4,518	4,308	4.9%
Unemployment Rate	2.9%	2.8%%	3.6%

The region's labor force grew by 1,172 individuals from 2023 to 2024, reaching a total of 155,272 individuals. Employment increased by 962 while unemployment increased by 210 individuals. As a result, the unemployment rate increased slightly to 2.9% in 2024

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	139,520	138,951	0.4%	0.7%
Natural Resources & Mining	2,856	2,870	-0.5%	2.3%
Construction	5,659	5,556	1.9%	3.4%
Manufacturing	21,283	21,859	-2.6%	-1.9%
Trade, Transportation, Utilities	30,232	30,434	-0.7%	0.5%
Information	1,170	1,086	7.7%	0.1%
Financial Activities	4,528	4,561	-0.7%	0.5%

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Professional & Business Services	9,519	9,761	-2.5%	0.1%
Education & Health Services	37,753	37,124	1.7%	2.70%
Leisure and Hospitality	13,949	13,706	1.8%	2.5%
Other Services	3,800	3,720	2.2%	3.7%
Public Administration	8,647	8,278	4.5%	4.4%

The three largest industries in the region remained the same from 2023 to 2024, comprising of roughly 64.0% of industry jobs in 2024: **Education & Health Services** (27.1%); **Trade, Transportation, Utilities** (21.7%); and **Manufacturing** (15.3%).

Information and **Public Administration** industries saw the largest percentage increase from 2023 to 2024, up by 7.7% and 4.5% respectively. **Manufacturing** and **Professional & Business Services** had the largest percentage decrease in employment from 2023 to 2024, down by 2.6% and 2.5% respectively. The local manufacturing decline in employment is consistent with the broader statewide trend.

Overall, industry jobs in the Western region of Wisconsin remained stable, increasing by 0.4% in 2024. Total area wages increased from \$7.3 billion in 2023 to \$7.6 billion in 2024, growing at a rate of 4.1%.

WOW WDA

The WOW WDA consists of three counties in the southeastern part of the state: Waukesha, Ozaukee, and Washington (WOW). 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)

	2024	2023	Percentage Change
Labor Force	356,507	354,599	0.5%
Employed	347,330	346,007	0.4%
Unemployed	9,177	8,592	6.8%
Unemployment Rate	2.6%	2.4%	8.3%

In calendar year 2024, WOW's labor force totaled 356,507 participants, consisting of 347,330 employed and 9,177 unemployed. From 2023 to 2024, the labor force gained 1,908 participants: a 0.5% increase. While the number of employed rose by 0.4% over the year, the number of unemployed also rose by 6.8%.

The WOW WDA unemployment rate was 2.6% in 2024; a 0.2 percentage point increase from 2023. This rate was lower than the statewide rate of 3.0%. Generally, the WDA experiences a lower unemployment rate than that seen statewide.

The LFPR for the WDA in 2024 was 67.4%. The regional LFPR decreased by 0.2% relative to 2023.

Employment and Wages (QCEW)

Industry	WDA Monthly Employment 2024	WDA Monthly Employment 2023	WDA Percent Change	Percent Change Statewide
Total, All Industries	347,483	346,057	0.4%	0.7%
Natural Resources & Mining	1,532	1,448	5.8%	2.3%
Construction	23,975	23,236	3.2%	3.4%
Manufacturing	64,220	65,828	-2.4%	-1.9%
Trade, Transportation, Utilities	71,048	70,919	0.7%	0.5%
Information	3,272	3,726	-12.2%	0.1%
Financial Activities	18,773	19,205	-2.2%	0.5%
Professional & Business Services	44,370	45,326	-2.1%	0.1%
Education & Health Services	65,151	62,861	3.6%	2.70%
Leisure and Hospitality	33,531	32,855	2.1%	2.5%
Other Services	11,396	11,075	2.9%	3.7%
Public Administration	9,855	9,580	2.9%	4.4%

In calendar year 2024, the total job base in the WOW region numbered 347,483 jobs; 1,426 more jobs than in 2023, up about 0.4%.

The **Education & Health Services** supersector saw an increase of 2,290 jobs over the year: up 2.7%. This was the largest numeric gain in the region. **Other Services** had the largest percent growth, growing by 2.9% (+321 jobs). **Manufacturing** had the largest numeric decline, losing 1,608 jobs.

Total area wages increased from \$22.3 billion in 2023 to \$23.2 billion in 2024. Area wages grew by \$848.9 million (3.8%) from 2023 to 2024. This rate was lower than the statewide rate of 4.7%.

Natural Resources & Mining (+11.5%) and **Construction** (+9.7%) had the largest growth rates. **Information** (-7.3%) was the only supersector to have declining total wages.

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:

- Using \$7.3 million in Industry-Driven Skills Training Fund grants awarded to the Wisconsin Department of Workforce Development (DWD) through USDOL to launch the Wisconsin Training for Resilient Advanced Industry Needs (WisTRAIN) project. Wisconsin will use the funds to deliver employer-driven, occupational skills training grants that focus on the emerging fields of advanced manufacturing and AI. The project builds on the success of Gov. Tony Evers' Workforce Solutions Initiative and aligns with recommendations by the Governor's Task Force on Workforce and Artificial Intelligence.
- Through coordination among WIOA State Plan partners and the Governor's Council on Workforce Investment, Wisconsin seeks to position itself for early and effective implementation of Workforce Pell in a way that complements its existing workforce and education infrastructure, supports transparency and quality assurance, and expands access to short-term, high-value training opportunities statewide.
- Placing renewed emphasis on system integration and coordination across workforce, education, and partner programs. Recognizing that fragmentation can limit effectiveness, Wisconsin continues to advance strategies that promote alignment, communication, and shared accountability.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required ⁶ and optional one-stop delivery system partners.⁷

[6] 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.

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

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.

A. The State's Workforce Development Activities

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 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 24 American Job Centers across the state, including 12 comprehensive and 12 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. Partners within the one-stop delivery system make services available on-site, via the use of technology, and/or via formalized referral processes. The methods partners use to provide services and coordinate with each other, including required resource sharing, are documented in the one-stop delivery system Memoranda of Understanding (MOU). The local WDBs carry out workforce activities by partnering locally as memorialized in 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 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 to 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 to 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, created a formal 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. To strengthen alignment and advance the integrated systems framework even further, consistent with Pillar III (Integrated Systems) of America's Talent Strategy, Wisconsin has since restructured its WIOA governance and joint operations framework to reduce fragmentation, clarify roles, and streamline decision-making and transparency across partners.

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).

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 wide-ranging 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 Disparities:

[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.

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 and be ongoing.

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. To build on this success, DWD and WIOA partners hosted a WIOA Roundtable event series in the fall of 2025 to bring together partners from across the state to increase communication and collaboration in the workforce system. The series included both virtual sessions and an in-person event.

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. 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 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.

The State of Wisconsin OVES has distinct duties and roles and responsibilities for the DVOP, LVER, and Consolidated staff.

The DVOP provides individualized career services to meet the employment needs of veterans with one or more barriers to employment as identified by DOLVET's guidance, eligible spouses, and other eligible individuals in accordance with VPL 5-24. These service categories will be adjusted to comply with subsequent guidance from DOL during the life of this planning cycle. The DVOP duties, to the case managed populations served, include:

- Conduct comprehensive assessment to identify barriers, education, and skill levels.
- Develop individualized employment plan (IEP). 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 ensure 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.

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.

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.
- DVOPs and LVERs provide training to AJC staff on subjects such as Veteran Priority of Service and/or screening a veteran for DVOP eligibility.

LVERs are fully integrated within the local Business Services Teams (BSTs) and conduct employer outreach as members of that team. The specific responsibility of the LVER as a member of this team is to advocate for veterans for employment and training opportunities with businesses, industries, unions, and apprenticeship programs. 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

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

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

1. VISION

Describe the State's strategic vision for its workforce development system.

2. GOALS

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

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment⁸ and other populations.⁹

(B) Goals for meeting the skilled workforce needs of employers.

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

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

3. PERFORMANCE GOALS

Using the tables provided within each Core Program section, 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.)

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.

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 employers 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 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 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

Consistent with WIOA Sec. 116(b)(3), the expected levels of performance for PY2026 and PY2027 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

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 as outlined in the Council in Workforce Investment 2022-2026 Strategic Plan https://wi-cwi.org/committees/council/cwi_2022_strategic_plan.pdf related to TANF, SNAP, reentry, as well as strategies focused on veterans and individuals with disabilities. The strategies focus on leveraging these programs to produce optimal outcomes for education achievement, employer involvement, enhancing the workforce, and aligning the workforce development system. For example, a TANF-related goal in the plan is to bolster TANF transitional job participation by improving employer awareness and utilization of the workforce development system. The partners are working together to improve customer service by exploring feedback loops in each program and aligning collection and use of these feedback loops to optimally serve customers. The CWI/state plan metrics also track workforce strategies in 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, and improving customer service.

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

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

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). "CAREER PATHWAY" IS DEFINED AT WIOA SECTION 3(7) AND INCLUDES REGISTERED APPRENTICESHIP. "IN-DEMAND INDUSTRY SECTOR OR OCCUPATION" IS DEFINED AT WIOA SECTION 3(23)

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)

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 identical 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 challenges across school districts that are limiting participation in career pathways programs and is developing recommendations to address the identified challenges – 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 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 improved 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.

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 governance 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.

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 1,925 annual total job openings for child care workers according to the Wisconsin Long Term Occupation Employment Projections 2022-2032. 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.

III. OPERATIONAL PLANNING ELEMENTS

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State's strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include—

1. 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.

In August 2025, the council held an all-day strategic planning session focused on understanding the current labor market and reviewing lessons learned and best practices to build on and advance the workforce system. Wisconsin is building on the success of the past three years to further advance our mission to connect Wisconsinites to jobs. The CWI looks to build a new four-year strategic plan that focuses on advancing the strength of Wisconsin's workforce development system and building on opportunities for innovation and growth.

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 four 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 recently incorporated the WIOA Executive Committee into the CWI committee structure as described below.

WIOA Governance and Resource Alignment Committee: The CWI WIOA Governance 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.

Through coordination among WIOA State Plan partners and the Governor's Council on Workforce Investment, Wisconsin seeks to position itself for early and effective implementation of Workforce Pell in a way that complements its existing workforce and education infrastructure, supports transparency and quality assurance, and expands access to short-term, high-value training opportunities statewide.

Wisconsin intends to leverage the CWI in developing a consistent approach to identifying “high-skill, high-wage, or in-demand” occupations, determining how Workforce Pell requirements will align with Wisconsin’s Eligible Training Provider List (ETPL) policies and criteria for short-term programs, exploring how Workforce Pell funds, administered through the U.S. Department of Education, will interact with existing WIOA tuition assistance and other federal and state funding streams, and researching approaches to strengthen Wisconsin’s capacity to track and report non-degree credential outcomes through the Workforce Data Integration System (WDIS) and related data-sharing initiatives

2. IMPLEMENTATION OF STATE STRATEGY

Describe how the lead State agency with responsibility for the administration of each core program or a Combined Plan partner program included in this plan will implement the State’s Strategies identified in Section II(c). above. This must include a description of—

A. 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 Governor's Council on Workforce Investment (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:

- **Steering Committee:** The ISD Steering Committee coordinates the work of the Integrated Service Delivery teams by fostering cross-agency collaboration and aligning priorities, workplans, and communications across WIOA programs and state workforce system partners.
- **Policy:** The ISD Policy Team is responsible for identifying and analyzing policies and best practices that support more aligned and integrated service delivery. The team is also responsible for recommending joint policies, actions, and tools that advance the WIOA State Plan's vision of an effective, accessible, and coordinated workforce system.
- **Communications:** The ISD Communications Team's purpose is 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.
- **Data Steward:** The ISD Data Steward Team is to coordinate and operationalize how programs organize and prioritize activities to ensure shared data is trusted, understood, supports organizational goals, and fosters accountability.

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.

As envisioned by WIOA, and demonstrated by Pillar III of America's Talent Strategy, Wisconsin aspires for an integrated system in which all WIOA partners leverage available resources, cross-train staff, and cooperatively provide shared services to reduce the duplication of services, eliminate inefficiencies, and maximize the quality of the customer experience.

The Department of Workforce Development (DWD), with the support of WIOA partners, hosts a series of informational sessions/events to promote cross-agency (and cross-program) familiarity of WIOA programs in order to more effectively coordinate and align policy and ensure successful implementation of WIOA initiatives at state and local levels.

Traditionally, DWD hosts a biennial WIOA Roundtable events that consist of a two-day conference planned jointly by State Plan partners. Roundtables offer WIOA partners and program staff the

opportunity to network, hear what partner agencies are doing, learn best practices related to WIOA strategies, and gain a better understanding of how to work collaboratively to achieve the goals within the WIOA State Plan.

In 2025, WIOA partners pivoted to an alternative framework to the biennial [WIOA Roundtable](#). Opposed to one, large-scale event like what has typically been done in previous years, the new approach consisted of an event series that included a virtual informational session and one smaller, more targeted in-person event. The intention behind the new framework is for the events be more focused on addressing business needs and improving service delivery and less on the traditional, large-scale conference style event.

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 serving all Wisconsinites.. 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 was in Tableau and 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 include:

- The coordination of WTCS professional development to better support IET expansion and development, including Open Educational Resources
- The expansion of access to external WTCS professional development through COABE Provider-led conversations and trainings on serving limited English proficiency 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. An updated memorandum of understanding (MOU) 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 access and partnerships 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 (IVSG)

Local Veteran Employment Representatives (LVERs) are fully integrated within the business service teams and conduct employer outreach as members of that team. The specific responsibility of the LVER as a member of this team is to advocate for veterans for employment and training

opportunities with businesses, industries, unions, and apprenticeship programs. OVES LVER, DVOP, and Consolidated (CODL) staff are integrated within the one-stop job center/career center network throughout the State of Wisconsin. LVERs and CODL 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/CODL 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.

DVOP/CODLs 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. DVOPs and LVERs provide training to AJC staff on subject such as POS and/or triaging a veteran for DVOP referrals.

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.

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 recently restructured its standing committees so the formerly 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 now incorporated into the CWI committee structure.

B. 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.

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 JVSG staff being represented on the WIOA governance and Integrated Service Delivery (ISD) teams, 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 (WBDs) 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 WBDs, 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 1,925 annual total job openings for child care workers according to the Wisconsin Long Term Occupation Employment Projections 2022-2032. 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." Based on data we feel we have achieved this goal, however we continue to push forward with Wisconsin 60Forward for ALL. Based on disaggregated data not all Wisconsinites are reaching the educational attainment 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 students who are justice involved creates additional opportunities for collaboration and alignment with WIOA partners.

The Department of Workforce Development (DWD), with the support of WIOA partners, hosted a series of informational sessions/events to promote cross-agency (and cross-program) familiarity of WIOA programs in order to more effectively coordinate and align policy and ensure successful implementation of WIOA initiatives at state and local levels. This series consisted of both virtual and in-person events for core and combined state plan partners to share specific program information via plenary sessions as well as break-out sessions that provide opportunities to share ideas, best practices, and service delivery strategies.

To leverage the strong partnerships that exist within Wisconsin's workforce development system, Council on Workforce Investment will be incorporating the WIOA Executive Committee into the CWI committee structure to increase efficiencies, transparency, and alignment between the CWI

and WIOA program partners.

C. 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 aligned.

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 State Plan partner. Like DCF, state level representation from the DHS is included on the WIOA leadership teams and 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 employment barriers, eligible persons, and additional populations. OVES has staff assigned and located in each of the 11 Workforce Development Areas (WDAs) in Wisconsin. DVOP staff 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. The goal of providing these services to eligible veterans and other eligible groups is for the customer to overcome employment barriers and obtain employment.

DVOPs conduct outreach and follow-up using a case managed approach. DVOP staff develop outreach locations that are best serving veterans with employment barriers seeking employment and other services. DVOP staff work with many community partners, such as County Veteran Service Officers, veteran service organizations, Homeless Veterans' Reintegration Program (HVRP), 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 at the agency location, at the AJC, or virtually. The goal of outreach is to identify those agencies to maximize the number of participants that are referred to the state's workforce delivery system who are both eligible for and benefit from DVOP employment services.

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 persons. 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, VA Chapter 31 – Veteran Employment and Readiness program (VR&E); or state/federal Apprenticeship programs and those associated with apprenticeships – Troops to Teachers, Helmets to Hardhats, Veteran In Piping, 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. Additionally, WTCS and DWD are partnered on creating the plan and process for Workforce Pell and are participating in the National Governors Association's Workforce Pell Readiness Cohort. 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 health care access services, English as a Second Language instruction, case management, job services and employability skills development, citizenship classes and immigration services, cultural orientation, and services for specific subgroups such as older refugees with specific needs, refugee children enrolled in K-12 school, and refugee youth and young adults. With funding from the Federal Office of Refugee Resettlement, the 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 health care 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 in accordance with the provisions under 29 CFR § 38.40. 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. 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.

To leverage the strong partnerships that exist within Wisconsin's workforce development system, Council on Workforce Investment will be incorporating the WIOA Executive Committee into the CWI committee structure to increase efficiencies, transparency, and alignment between the CWI and WIOA program partners.

The WIOA governance committee under the CWI will lead the collaborative activities and orchestrate several cross-agency teams to coordinate the details and recommendations on WIOA program initiatives. With the implementation of WIOA, specific strategies have been utilized to align the work of core and required partners at both the state and local level. Leadership from the one-stop partner programs will meet regularly in between the quarterly CWI meetings to provide guidance on the work and make commitments to specific actions necessary for moving forward.

D. 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 (WDB), 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 partner 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 justice involved populations, 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's 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 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 (DSPS).
- a registered apprenticeship approved by the Wisconsin Department of Workforce Development's (DWD) Bureau of Apprenticeship Standards (BAS).
- a pre-apprenticeship certified by the Wisconsin 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 DSPS. 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 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.
- Ensure all Wisconsinites have equal access to education and ensure success for all students.

Moving forward, WTCS and DPI will continue to leverage the Strengthening Career and Technical Education for the 21st Century Act (Perkins) to advance student access 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 for members of special populations.
- Continue to leverage data used for Perkins reporting to identify disparities or gaps in performance and explore potential causes and interventions to eliminate these gaps in student access and success.
- Continue to collaborate with stakeholders (employers, community organizations, etc.) to increase dual enrollment offerings, bridges to postsecondary education (including supporting adult education and English language learning students to transition to postsecondary CTE), expand work- based learning and apprenticeship opportunities, and enhance student success and awareness of career and technical education opportunities.

Consistent with priority for aligning education with workforce needs under Pillar I: Industry-Driven Strategies America's Talent Strategy, 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, health care 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 Lightcast, 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

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 achievement gaps and enhancing

economic mobility. As previously described, the Title II program supports access and success in Integrated Education and Training in multiple ways that include: coordinating achievement-focused professional development for Title II providers, establishing the expectation among Title II providers that Integrated Education and Training is prioritized for all Wisconsinites with the largest barriers to employment 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 annually. 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 8,000 enrolled apprentices in the 2024-25 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 innovate 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 (WFF) 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 grants support accelerated workforce entry by enabling students to earn dual enrollment credits, industry-endorsed certificates, and technical endorsements on their high school diplomas. The WFF Technical Education Equipment Grant aligns with key strategies in America's Talent Strategy, specifically, the priorities under Pillar II: Worker Mobility. The grants promote career mobility and expand access to non-degree, employer-valued pathway into the workforce by embedding industry-recognized credentials and stackable credit opportunities within secondary education.

G. 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 local Workforce Development Boards (WDBs), 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 workforce development areas (WDA), 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

WRTF 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:

- **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.

B. STATE OPERATING SYSTEMS AND POLICIES

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section **II Strategic Elements**. This includes—

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., 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. THE 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 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 Performance Accountability and Reporting can be found at: <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 began 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

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	• 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 Workers 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

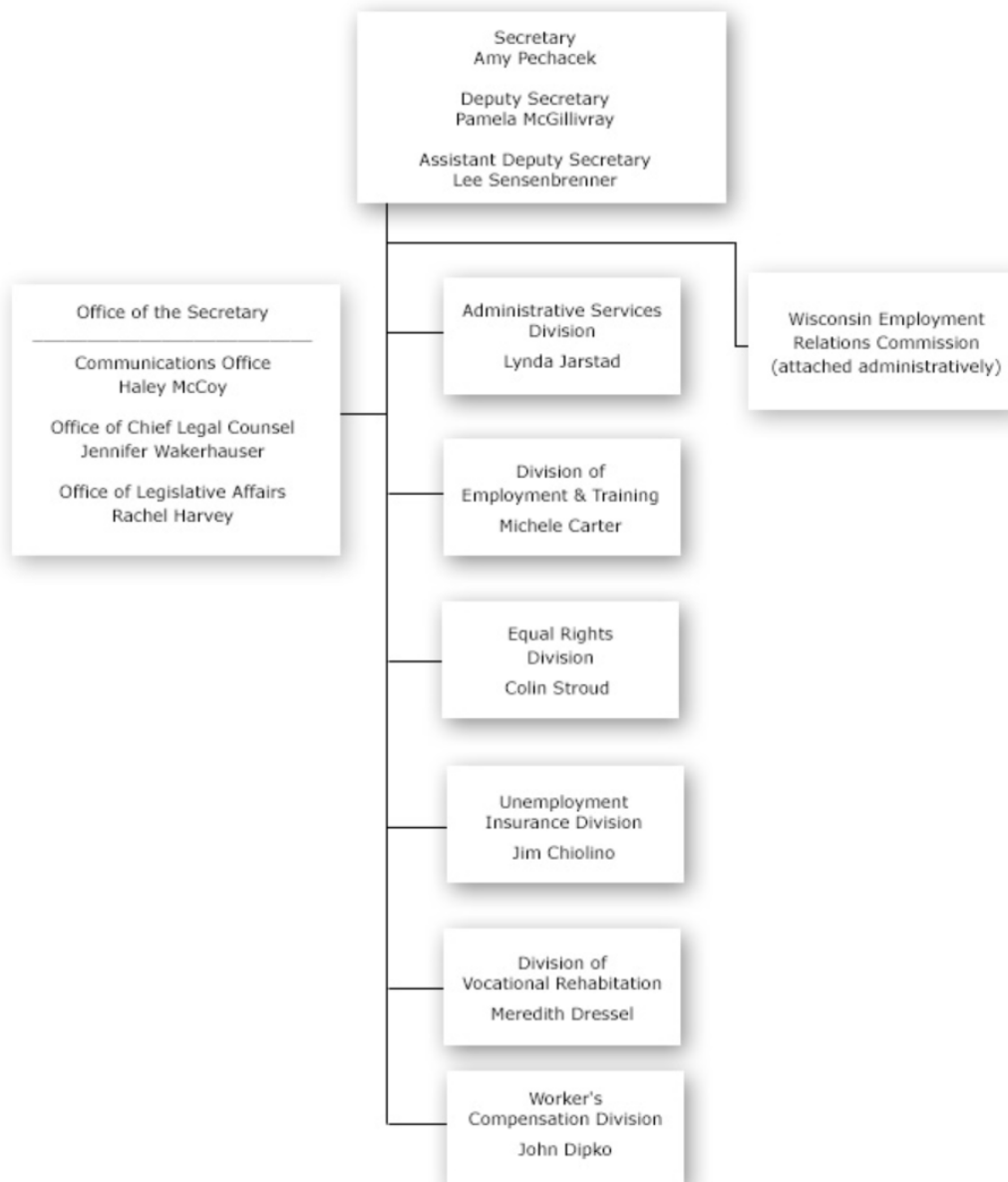
State Agency	Programs
Department of Children and Families	Temporary Assistance for Needy Families (TANF)
Department of Corrections	Reentry Employment Opportunities (REO) Program
Department of Health Services	Employment and Training Programs under the Supplemental Nutrition Assistance Program (SNAP E&T)

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 Lee Sensenbrenner. 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



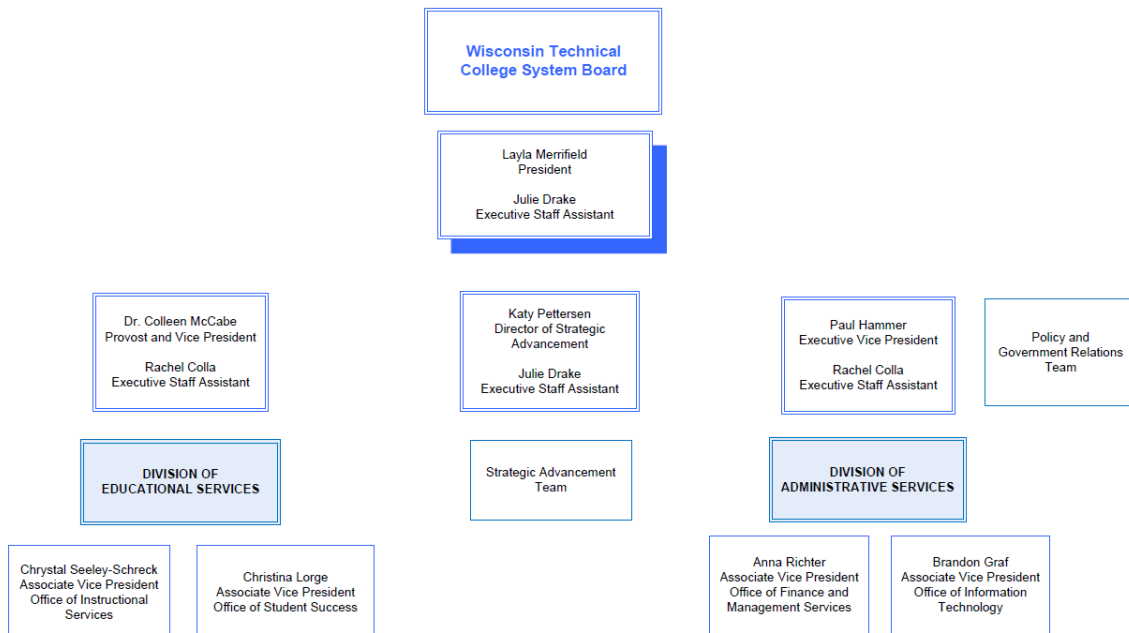
Wisconsin Technical College System (WTCS)

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 Layla Merrifield, 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, Community Based Organizations, Literacy Council, and other entities are able to 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

Executive Team

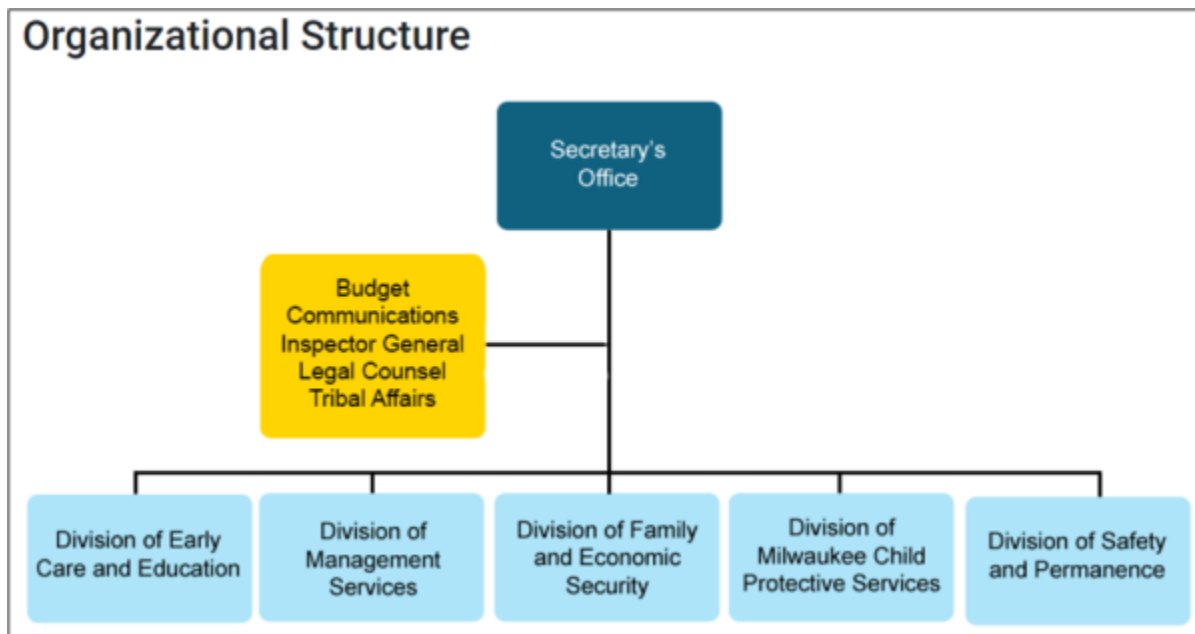


Department of Children and Families (DCF)

DCF is the state agency responsible for ensuring Wisconsin's children and youth are safe. DCF is led by Secretary-designee Jeff Pertl, appointed by the Governor, and Deputy Secretary Nadya Perez-Reyes and Assistant Deputy Secretary Jessica Justman. 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

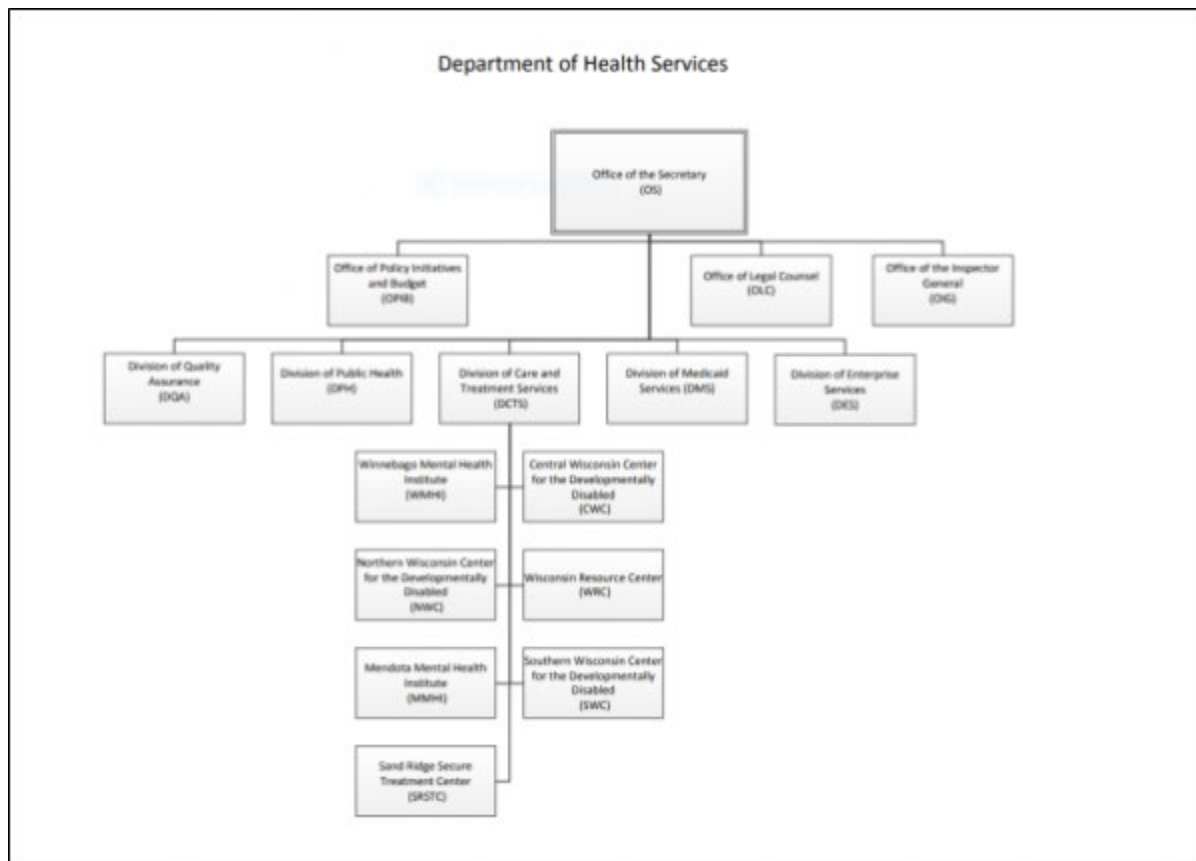


Department of Health Services (DHS)

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 Sam Austin. 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

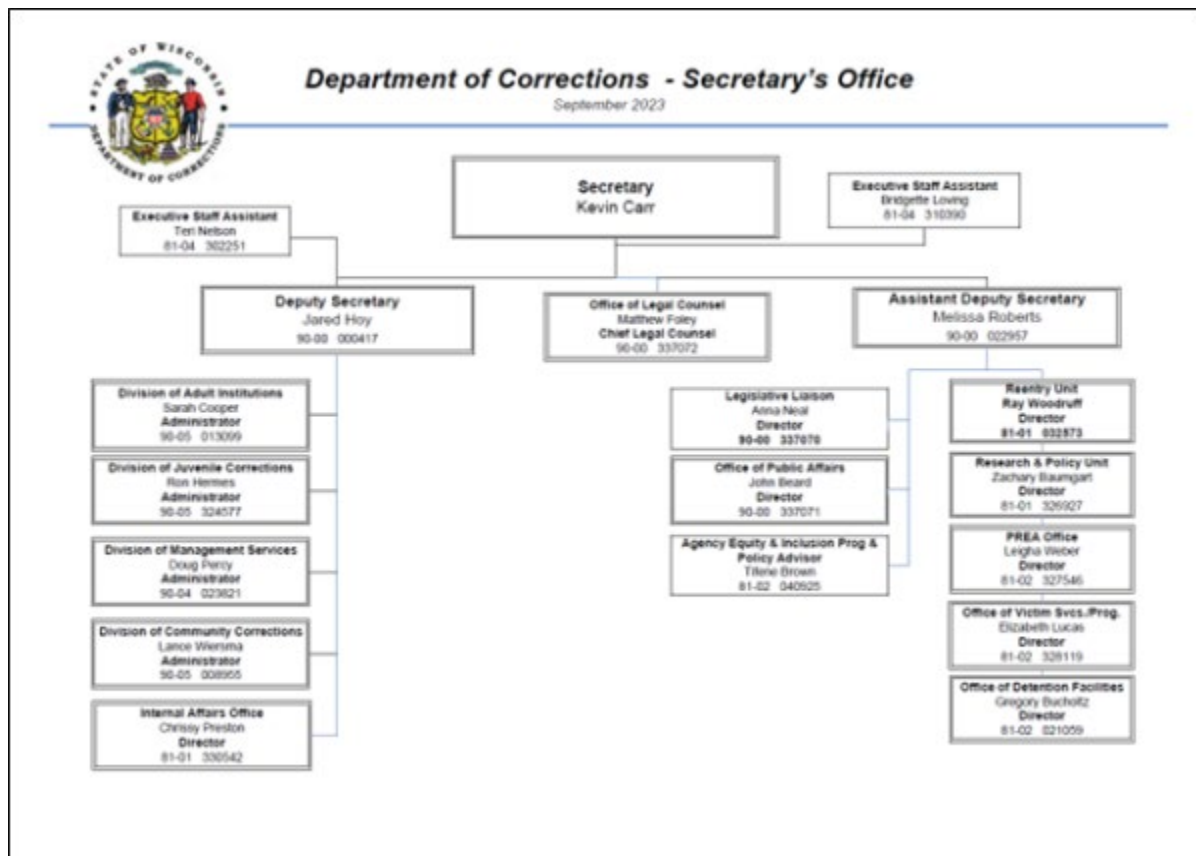


Department of Corrections (DOC)

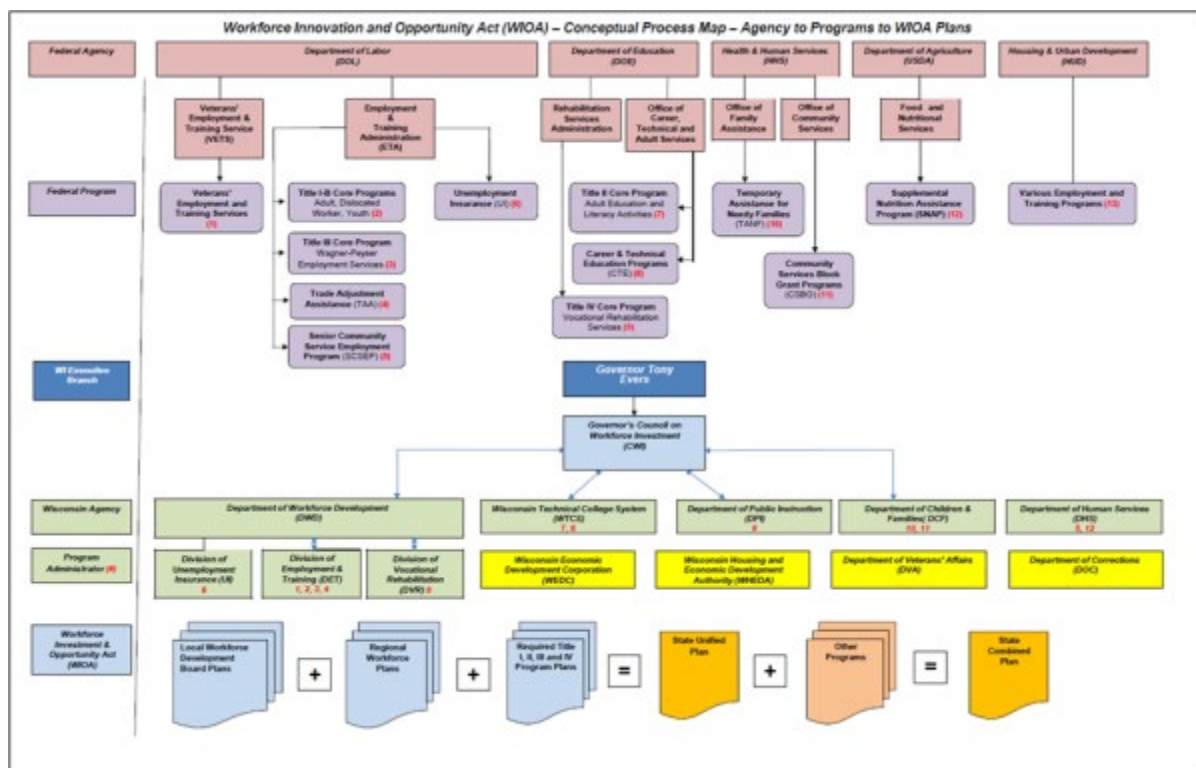
DOC is the state's public safety agency that provides care and services to approximately 23,000 individuals incarcerated in 37 state institutions and supervises over 66,000 persons on probation and parole through 131 field offices. DOC is led by Secretary Kevin Carr. The agency has four divisions: Division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

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 latest publication of the CWI Activities Report.

The WIOA governance structure in Wisconsin formed under the 2020 – 2024 WIOA Combined State Plan established the WIOA Executive Committee as the executive governing body over the development and implementation of the WIOA Combined State Plan. Members of that committee include the Combined State Plan partner agency heads or their designees such as, cabinet secretaries from the Departments of Workforce Development, Health Services, Children and Families, and Corrections, and the president of the Wisconsin Technical College System.

To leverage the strong partnerships that exist within Wisconsin's workforce development system, the CWI is in the process of reorganizing its standing committees and incorporating the WIOA Executive Committee into the CWI committee structure to increase efficiencies, transparency, and alignment between the CWI and WIOA program partners.

The new WIOA Governance Committee formed under the reorganized CWI structure includes leadership from all Combined State Plan partner programs and has the primary responsibility of ensuring compliance with the federally mandated WIOA requirements while ensuring ongoing alignment of resources across sectors within the context of the 2022 – 2026 CWI Strategic Plan and PY2024-27 WIOA State Plan. This allows each of the Combined State Plan partners to be represented on the CWI and help to align efforts across programs and agencies.

State Board Membership - 2026 Roster

Government Officials, State Agency, WIOA Core Program Representatives

1. Governor Tony Evers
2. Secretary Amy Pechacek, Dept. of Workforce Development – WIOA Titles I & III
3. Meredith Dressel, DWD – Div. of Vocational Rehabilitation – WIOA Title IV
4. Dr. Eric Fulcomer, Wisconsin Association of Independent Colleges & Universities
5. Layla Merrifield, Wisconsin Technical College System – WIOA Title II
6. Secretary John Miller, Wisconsin Economic Development Corporation
7. Secretary-designee Jeff Pertl, Dept. of Children and Families – TANF
8. Jeriah Rave, Ho-Chunk Nation – Tribal Representative
9. State Superintendent Dr. Jill Underly, Department of Public Instruction
10. County Executive David Crowley, Milwaukee County – Local Elected Official
11. Sen. André Jacque, Wisconsin State Senate – Senate Majority
12. Rep. Shelia Stubbs – Wisconsin State Assembly – Assembly Minority
13. Sen. Jamie Wall, Wisconsin State Senate - Senate Minority

Business Representatives

1. Masood Akhtar, CleanTech Partners
2. Jan Allman, Fincantieri Marine Grou
3. Rebecca Bartoszek, Fox Cities Chamber of Commerce
4. Shiva Bidar-Sielaff, UW Health
5. Christopher Conard, PMI, Inc.
6. Bob Davis, Inspire Early Childhood
7. Shah Haqqi, S&L Global Consulting
8. Carver Harries, Ashland Area Development Corp.
9. Amanda Hoefling, Dairyland Power Cooperative
10. Nicholas Kapsa, Ahlstrom
11. Mark Johnson, CGI Accounts
12. Mark Kessenich, Associated General Contractors

13. Melissa Meschke, St. Croix Economic Development Corporation
14. Thomas Miller, Aurora BayCare Medical Center
15. Blake Moret, Rockwell Automation
16. Olivia Otte, Green County Development Corporation
17. Pravin Raikar, Lockstep Solutions LLC
18. Nora Roughen-Schmidt, UW System Small Business Development Center
19. Kathi Seifert, Katapult LLC
20. Sachin Shivaram, Wisconsin Aluminum Foundry – CWI Chair
21. Brent Smith, Johns, Flaherty, & Collines
22. Michelle Tressler, Hinterland Brewery
23. Ann Troka, Sargento
24. Ann Zenk, Wisconsin Hospital Association
25. Corey Zetts, Menomonee Valley Partners

Workforce Representatives

1. Lindsay Blumer, WRTP | Big Step – Joint Labor-Management Apprenticeship
2. Jonathan Abraham, Wisconsin State Council of Carpenters – Organized Labor
3. Ann Franz, NEW Manufacturing Alliance – CWI Vice Chair
4. Jake Gorge, Wisconsin Literacy Inc.
5. Leighann Hanrahan, Centers for Independence
6. Shaun McHugh, International Union of Operating Engineers – Organized Labor
7. Dan Mella, Plymouth School District
8. Sara Rogers, Employ Milwaukee
- *Seth Lentz, Workforce Development Board of South-Central Wisconsin – Ex-Officio Member

Members of the Council (with the exception of legislative representatives who are appointed by the presiding officer of their respective chamber) are appointed by the Governor to serve a term of three years, subject to the pleasure of the Governor. The CWI Bylaws specify that the Governor will stagger appointments to ensure that only a portion of the membership expires in any given year.

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

A. 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

Wisconsin's state workforce board (the Governor's Council on Workforce Investment) will assess the WIOA Core programs based on their performance on the Primary Indicators of Performance outlined in WIOA Sec. 116. The Performance Advisory Committee (PAC) is a statewide sub-committee under the WIOA Integrated Service Delivery Data Steward Committee that is tasked with advising the CWI on performance matters. The Performance Advisory 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 DWD's Unemployment Insurance (UI) Division. The PAC shall provide briefings on these reports to the CWI for their review and action. WIOA's primary indicators 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 (i.e., DWD) 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.

The state Council on Workforce Investment (CWI) will assess the WIOA core program's performance against adjusted values each year. WIOA 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. As part of assessment, the WIOA Core programs must meet thresholds determined for Individual Indicator Scores and Overall Indicator and Program Scores. Local areas for Title I must meet thresholds for Individual Indicator Scores.

There are multiple different levels of performance. 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.

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 Council on Workforce Investment (CWI) will review and assess the WIOA partner programs on their common performance metrics and the CWI metric dashboard. These assessments are conducted on a quarterly basis and reported to CWI. A statewide performance briefing will highlight strengths and weaknesses of the partner programs to CWI (i.e., the state workforce

board) on a quarterly basis. Wisconsin's WIOA Integrated Service Delivery system is developing a technical solution to display metrics outlined in CWI's strategic plan. The CWI metrics project will develop a digital product that can be used by the CWI and the WIOA leadership to examine the progress of both the CWI strategic plan and the WIOA State Plan.

Temporary Assistance for Needy Families (TANF) will assess their performance results that are in the "Fiscal Responsibility Act of 2023". These metrics will be assessed on an annual basis and presented to CWI. The assessments will identify strengths and opportunities for improvement in collaboration within Wisconsin's workforce system.

The Supplemental Needs Assistance Program – Employment Training (SNAP-ET) assesses performance based on performance indicators in 7 CFR Part 273.7, Supplemental Nutrition Assistance Program (SNAP): Employment and Training Program Monitoring, Oversight and Reporting Measures. The metrics are the number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T, the number and percentage of E&T participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in E&T, the median quarterly earnings of all the E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T, and the number and percentage of participants that completed a training, educational, work experience or an on-the-job training component. These metrics will be reviewed by CWI on an annual basis for each federal fiscal year. The assessments will identify strengths and opportunities for increased collaboration within Wisconsin's workforce system.

TAA will assess their indicators of performance outlined in Sec. 404 of the Trade Preferences Extension Act of 2015 against federal Government Performance Results Act (GPRA) goals on an annual program year basis. The assessments will identify strengths and opportunities for increased collaboration within Wisconsin's workforce system.

The Jobs for Veterans State Grant (JVSG) will be assessed by employment outcomes assigned by the DOL VETS, Employment Rate 2nd Quarter After Exit, Employment Rate 4th Quarter After Exit, Median Earnings 2nd Quarter After Exit and the Uniform National Threshold Entered Employment Rate (UNTEER) identified by the DOL VETS. This assessment will be done on a program year basis. The assessment will be reported to the CWI. The assessments will identify strengths and opportunities for increased collaboration within Wisconsin's workforce system.

B. 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 state Performance Advisory Committee (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>
- <https://www.dol.gov/agencies/eta/performance/results/assessments>

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://acf.gov/ofa/site_search?keyword=Work+Participation+Rates

The PAC found that Wisconsin demonstrated strong employment and median earnings outcomes during PY 2023 and into PY 2024, performing above national averages for WIOA Title I and Title III participants. Assessments identified Credential Attainment and Measurable Skill Gain (MSG) rates as areas of concern during PY 2024, with performance trending downward relative to expectations. Analysis indicated that some participants were entering employment after gaining sufficient skills but before completing credential requirements, and that economic conditions and training participation patterns may also have influenced outcomes.

Based on these findings, the State adapted its strategies to strengthen data quality, reporting accuracy, and documentation of participant progress. In PY 2024, Wisconsin launched a statewide WIOA Data Lifecycle training series to improve understanding of reporting requirements, performance indicators, and data validation expectations across programs. The State also advanced cross-agency administrative data matching through the WIOA Data Efficiencies Project, integrating foster care, TANF, and education data into customer records to reduce participant reporting burden, improve documentation of outcomes, and support federal data validation requirements. Performance monitoring processes were also strengthened through more timely and accessible performance information.

Subsequent assessments at the end of PY 2024 showed substantial increases in reported credentials and measurable skill gains, reflecting improvements in reporting completeness and outcome documentation. The PAC attributed these gains in part to expanded training, enhanced data sharing, and strengthened performance monitoring. Wisconsin is now experiencing a downward trend in employment rate indicators, which has become a focus for PY 2025. The state will continue using assessment findings to guide technical assistance, data quality efforts, and cross-agency coordination to drive continuous improvement across core and partner programs.

C. 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 partner with the Governor's Council on Workforce Investment (CWI) to verify and monitor the CWI 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, so WDBs and the public can 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. Wisconsin has safe and secure space in the Coleridge Initiative's Administrative Data Resource Facility (ADRF). This space contains Unemployment Insurance (UI) claim, UI wage, UI state directory of new hire, and WIOA Title I, III, IV and workforce partner career, training, and support

service data. DWD staff partner with researchers to analyze the data to build evidence to inform workforce planning, services, training, and supports for employers, workers, and job seekers.

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 section. Performance related activities and evaluation efforts of other WIOA core programs and partners are reported after these targeted highlights.

WIOA Title I Adult Return on Investment Study: WDIS staff worked with interns from the University of Wisconsin-Madison to analyze WIOA Title I service, cost, and outcomes data. The study evaluated the return on investment (ROI) for Wisconsin WIOA Title I Adult Program PY 2021 exiting program participants. Researchers analyzed the wage growth compared to cost of service, inflation, and a comparison group of Title III program service recipients, controlling for demographic factors and preexisting trends. The results demonstrate a clear, positive wage growth of WIOA Title I Adult program participants, exceeding cost of service, inflation, and the comparison group, and indicating a positive ROI for the program.

Service Cost Compared to Wage Regression Prediction of Wage Changes from Program Entry to Eight Quarters after Exit

Services	Count	Cost per Participant	<i>Wage Growth Estimate</i>
Career (Constant)	1,539	\$3,934.08	\$4,528.69
Training	1,029	\$2,407.62	\$5,323.29
Support	959	\$893.97	\$5,655.27
Career and Training	1,029	\$6,341.70	\$9,851.98
Career and Support	959	\$4,828.05	\$10,183.96
Career, Training, and Support		\$7,235.67	\$15,507.25

Association between Training and Employment Outcomes: Wisconsin's WDIS Research and Evaluation workgroup worked on a research study to learn more about what demographics, employment influencers, and training services funded by different WIOA and partner training programs predict higher wages. Researchers pulled and analyzed data for 186,130 Workforce Data Integration System (WDIS) participating episodes that ended between April 1, 2019, and March 31, 2020. Initial analyses indicate that training across the different programs is associated with higher wages. Several workforce training programs were associated with higher wages both six months and two full years after program exit after controlling for demographics, education, and wages prior to program entry. Registered apprenticeship (RA) stood out as the program associated with the largest employment gains. Participants with a RA had an increase in wages of over \$5,000 more per quarter (over \$20,000 per year), which persisted two years after exit. Work-based learning and on-the-job training were also consistently positively associated with employment rates and wages, though somewhat smaller in magnitude. Work-based learning

participants had wage increases of \$1,600 per quarter more two quarters after exit, and on-the-job training participants had wage increases of \$1,250 per quarter more two quarters after exit. Other training programs were also associated with higher wages and employment rates, albeit at lower levels. These included Wisconsin Fast Forward (WFF) employer training, occupational and vocational training, and youth apprenticeship (YA). Researchers are now working on publishing the findings from this report.

WIOA Co-enrollment Reports: Given that research has demonstrated improved employment outcomes when individuals co-enroll across WIOA programs and partners ([Hartman et al., 2024](#)), Wisconsin WIOA partners use co-enrollment reports to assess prevalence of [Wisconsin WIOA co-enrollment](#) and discuss additional partnership opportunities. Given the observed higher wages when WIOA participants co-enroll in apprenticeship opportunities, WDIS researchers have built and will continue building quarterly co-enrollment reports across apprenticeship (including both registered and youth) programs and WIOA Title IV, Veterans, and WIOA Title I Adult, Dislocated Worker, and Youth programs to further inform co-enrollment in partner programs. Work is being done to include apprenticeship co-enrollment and demographic information to the co-enrollment dashboards.

WIOA Evaluation Peer Learning Cohort (PLC) Customer Feedback Loop Foundational Fact Finding: Wisconsin continued work started as part of the WIOA Evaluation Peer Learning Cohort (EvalPLC). The aim was to improve coordination of Wisconsin WIOA evaluation activities, specifically to learn ways to improve customer feedback loops to better assess program effectiveness and increase customer satisfaction. The Wisconsin EvalPLC workgroup included all WIOA Title programs as well as partners from TANF, SNAP, apprenticeship, and a regional one-stop operator. The group shared current customer feedback practices and gathered information on customer feedback loops from the research literature, other states, and federal partners. The group found that it's important to plan for customer feedback, include feedback throughout the entire process, and incorporate feedback in an iterative process, while also adjusting feedback loops based on collected feedback. The group then collaborated and developed a Customer Feedback User Guide. The guide provides information on what customer feedback is and why gathering feedback is important. The guide provides information on what successful customer feedback looks like and technology tips for implementation. There is further information on the role, scope, and methodology of gathering staff feedback, in part as a compliment and/or supplement to customer feedback. Finally, the guide provides examples and resources.

Worker Connection Evaluation: The Worker Connection program was funded with American Rescue Plan Act (ARPA) funds and piloted strategies that may be adapted by job centers and WIOA Title I programs. Specifically, Worker Connection piloted the use of targeted outreach, one-on-one career navigation services, and WorkAdvance training. Worker Connection was piloted between 2022 and 2024 in two Workforce Development Areas (WDAs), enrolling 3,127 participants, providing 19,755 career services, and connecting over 500 participants to WorkAdvance training. The University of Wisconsin Center for Education Research conducted a process evaluation of the Worker Connection pilot program.

After networking with 713 community partners, researchers found that the Career Navigators could better connect with underutilized talent pools. These partnerships help connect individuals who were unemployed, underemployed, or not in the labor force but would be with the right supports. Career Navigators used data from the current population survey and local community conversations to identify underutilized talent pools, including individuals with no high school degree, long-term unemployed, individuals who believed there is no work for them, individuals

who last worked in accommodation and food services, unmarried minority men, female parents, individuals in rural areas, unhoused individuals, individuals with disabilities, and justice-involved individuals. Career Navigators then used this information to identify local community organizations that were already connected to these individuals, including visiting libraries, other government agencies, education and training organizations, housing insecurity and recovery organizations, immigrant organizations, homeless shelters, recovery centers, correctional facilities, other workforce organizations, and other support organizations. This collaborative effort improved targeted outreach to underutilized talent pools, with 71% of enrollments the result of referrals from partner organizations and programs. As a result, 28% of participants were single parents, 15% self-identified as having a disability, 20% were unhoused at entry, 26% had an arrest or conviction record at entry, 29% were not employed for 27 weeks or more at entry, and 33% were believed to be overqualified at most recent job.

Career Navigators used a human-centered, skills-based approach with job seekers, navigating career goals and services with participants. They were trained to use motivational interviewing with a trauma-(or healing) informed lens, an effective technique to guide clients through the discovery process to develop a positive profile and identify their conditions of work. Researchers found that 68% of clients who received a positive profile (identified interests, skills, abilities, etc.) connected with a good job match. Developing a positive profile and identifying a job seeker's interests, skills, and abilities improved their ability to use local career navigation tools and local networks to connect job seekers to local jobs and/or training to better reach career goals. Project partners also recognized the need for short-term affordable skill-building training to help meet the skilled workforce needs of local businesses.

The Worker Connection program provided a pilot of implementing a training model to fill this need. Researchers identified a need to improve data collection from these training programs and use the data to improve operational implementation of this needed training resource. There is a continued need for funding to make training possible, especially as training costs continue to increase and when job seekers have limited income and resources, with many job seekers having transportation, childcare, housing, food, and other support needs. The Wisconsin Department of Workforce Development's Bureau of Job Service is using the findings from the Worker Connection pilot to hire a Career Navigator in each Workforce Development area and train these new staff based on the research findings of this pilot program.

Career Pathways Advancement Evaluation: Wisconsin's Career Pathways Advancement (CPA) initiative is funded by the U.S. Department of Education (DOE)'s Rehabilitation Services Administration Disability Initiative Fund. Wisconsin's initiative uses career pathways for career advancement, with the aim to improve employment outcomes for people with disabilities and connect vocational rehabilitation 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 CPA project evaluation, a partnership between DWD staff and University of Wisconsin (UW) researchers, goes beyond DWD's Division of Vocational Rehabilitation (WIOA Title IV) consumer services and outcomes to include WIOA Title I, II, and III partners. 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 Oct. 16, 2024:

- Wisconsin's CPA initiative had 1,068 participants enrolled with 41% of them co-enrolled in another WIOA or partner program including 24 participants co-enrolled in the WIOA Title II program.
- Out of the 1,068 participants:
 - 56% enrolled in a health care career pathway
 - 25% enrolled in a digital/information technology career pathway
 - 11% enrolled in a manufacturing career pathway
 - 8% enrolled in a construction career pathway
- Most participants have connected to training: 93% of all participants started training in their chosen career pathway and 73% of all participants have obtained a measurable skill gain and/or credential.
- A small number of participants have completed training, including 157 participants who have both exited DVR services and are employed in one of the four career pathways:
 - 52% in health care
 - 25% in manufacturing
 - 17% in construction
 - 6% in digital/information technology

During the next period of this evaluation effort, researchers will determine if these career advancement strategies lead to increases in wages, hours worked per week, and employer benefits, and decreases in public benefits.

Labor Market Information Research and Reports: Wisconsin continues to provide updated labor market information (LMI) on [WisConomy](#). The [website](#) contains interactive tools and reports that include:

- [Award winning visual catalog data dashboards](#), most recently awarded the "Best State LMI Product or Collaboration for Data Collection and Dissemination" at the 2024 Council for Community and Economic Research Annual Conference.
- [2020-2040 General Purpose Tax Revenue Projections for Wisconsin](#)
- [2025 County Profiles](#)
- [Labor Supply Projections for Wisconsin 2020-2040](#)
- [2024 WI State and Regional Economic Analysis](#)
- [Registered Nurse Supply and Demand Forecasts 2022-2040](#)
- [Wisconsin Recovery Report 2023-2025](#)

LMI staff continue to provide support to maintain the [DWD Career Pathways website](#), so job seekers can navigate labor market information as they explore occupations in 16 career clusters by education level. The website provides career pathway examples with local hot jobs and 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 has been updated to reflect the resources and features on the DWD Career Pathways website.

RESEA Evaluation: In Wisconsin, the Re-Employment Services and Eligibility Assessment (RESEA) program is administered by DWD's Bureau of Job Service (WIOA Title III Wagner-Peyser). The Bureau of Job Service contracted an outside evaluator, Actus Policy Research, to conduct a confirmatory impact, exploratory, and process/implementation analysis. Actus Policy Research recently completed the final Wisconsin RESEA evaluation report. Random assignment started April 2022 and continued through the fall of 2023. During this time, 48,110 UI claimants were enrolled and randomly assigned to one RESEA meeting (29.4%), multiple RESEA meetings (29.5%), and no RESEA meetings (41.1%). Researchers determined random assignment was indeed random and enrollment numbers were sufficient to detect differences between groups. The evaluation found participants with one or more RESEA meetings had a higher access to job counseling services (65% compared to 3% in the control group), as well as statistically significant decreases in the number of benefit weeks UI payments were collected, the benefit amount collected, and the proportion of claimants with exhausted benefits. Researchers found the UI benefit cost savings (i.e., reduction of benefit weeks and amount collected) exceed the cost of the RESEA program. They also found that the RESEA assessment score predicts who will benefit most from RESEA services, which would increase the efficiency of the program rather than randomly selecting participants. A modest increase in employment rates (0.8 percentage points) one quarter after program entry was also found, but these differences were not observed in later quarters.

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 Wisconsin Departments of Public Instruction (DPI) and Health Services (DHS) with the aim to track and monitor competitive integrated employment (CIE) for individuals with disabilities who receive publicly-funded community services. The most recent data is available in the 2025 Joint CIE Report.

In alignment with recommendations from a prior study, DVR undertook a survey of participants in the Milwaukee area to evaluate customer satisfaction focusing on VR staff cultural competency with support from the Survey Research Center at the University of Wisconsin-River Falls. Results confirmed both that job seekers felt VR staff employed culturally competent methods, and that tailoring efforts to the specific needs of consumers by race, age, and location is warranted based on significant gaps in outcomes. This survey also used a novel approach of SMS-texting to conduct outreach, yielding additional information about the efficacy of this approach, which DVR will consider when designing future participant feedback processes.

In addition, WDIS researchers collaborated with the National Technical Assistance Center on Transition: The Collaborative (NTACT:C) and the Vocational Rehabilitation Technical Assistance Center for Quality Employment (VRTAC-QE) to write a paper on Education and Pre-Employment Transition Service Predictors of Wages for Transition Age Youth with Disabilities. Researchers found that credential attainment, pre-employment transition services, and co-enrollment in partner programs predicted higher wages two quarters for transition age youth (14 to 24 years old) after exiting WIOA Title IV services. These findings varied by demographics, lived experiences, and state-level differences in service delivery. Wisconsin WIOA Title IV program was highlighted as the third highest state predicting higher wages after receiving pre-employment transition services, with youth averaging \$1,033.71 more in quarterly earnings two quarters after exit.

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 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. Customers reported positive experience using the tool to identify their employment plan, action steps and services, and resources to reach their employment goals. Surveyed staff reported concerns with the time it takes to use the tool and noted specific concerns regarding the technology and related policy. State staff have used these reported experiences to improve the tool and the related policy to ease use and compliment positive customer experience with CEPT. [Findings](#) have been posted on the WDIS website for local WDB and other partners to reference.

Assessing effectiveness of services: Wisconsin WIOA Titles I, III, and IV staff partnered to publish a research article titled [The Influence of Demographics and Workforce Innovation Opportunity Act \(WIOA\) Employment and Training Services on Employment Outcomes for Teenagers Receiving Supplemental Security Income \(SSI\) and their Parents published in the Rehabilitation Counselors and Education Journal](#). The research article explains how WIOA Title IV services provided by DWD's Division of Vocational Rehabilitation were associated with higher employment rates and Promoting Readiness of Minors in Supplemental Security Income (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) 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 and individualized services, and case management were associated with higher wages. Overall, the study showed that WIOA Title I, III, and IV services together resulted in better employment outcomes than for those that did not receive services, providing evidence to support continued collaboration.

Given that research has demonstrated improved employment outcomes when individuals co-enroll across WIOA programs and partners (Hartman et al., 2024), Wisconsin WIOA partners use

co-enrollment reports to assess prevalence of [WI WIOA co-enrollment](#) and discuss additional partnership opportunities. Given the observed higher wages when WIOA participants co-enroll in apprenticeship opportunities, WDIS researchers have built and will continue building quarterly co-enrollment reports across apprenticeship (including both registered and youth) programs and WIOA Title IV, Veterans, and WIOA Title I Adult, Dislocated Worker, and Youth programs to further inform co-enrollment in partner programs. Further, Wisconsin's 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 and partner training programs predict employment outcomes for a larger, more comprehensive group of job seekers. Initial analyses indicate that training is associated with higher wages. Now, researchers are working on completing the analysis by looking at wage trends across programs and using regression analyses to identify variances across training programs as well as other factors (such as demographics, employment influencers, geography, etc.) that may influence this relationship. Research and program staff will subsequently write up and share findings on the WDIS website as well as through targeted outreach to partners such as the state's local WDBs.

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 September 2020. Final reflection calls were completed in spring 2024, with the final report completed in 2025.

WIOA Title II Action Research As part of its broader effort to enhance data sustainability and accessibility, the Wisconsin Technical College System (WTCS) has transitioned its Adult Education Dashboard from Tableau to Microsoft Power BI. This move supports long-term cost efficiency and better integration with existing Microsoft tools used across the system. The Adult Education Dashboard, which provides critical insights into adult learner engagement, outcomes, and program performance, is now in the final stages of publication within the Power BI platform. Dr. Hilary Barker from WTCS is actively seeking feedback from stakeholders to ensure the dashboard continues to meet the evolving needs of educators and administrators and remains a valuable resource for data-informed decision-making in adult education.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

A. 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)

See the attached "Operational Guide to Develop the Annual Allocations for Workforce Development Areas" in the appendix.

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

See the attached "Operational Guide to Develop the Annual Allocations for Workforce Development Areas" in the appendix.

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. FOR TITLE II

I. DESCRIBE THE METHODS AND FACTORS THE ELIGIBLE AGENCY WILL USE TO DISTRIBUTE TITLE II FUNDS.

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

- Assist adults in becoming literate and in obtaining the knowledge and skills necessary for employment and economic self-sufficiency;
- Assist adults who are parents or family members in obtaining the education and skills that: (A) are necessary to become full partners in the educational development of their children and (B) lead to sustainable improvements in the economic opportunities for their family;
- Assist adults in attaining a secondary school diploma and in the transition to employment, postsecondary education and training through career pathways;
- Assist immigrants and other individuals who are English language learners in (A) improving their (i) reading, writing, speaking and comprehension skills in English; and (ii) mathematics skills; and in (B) acquiring an understanding of the American system of government, individual freedom and the responsibilities of citizenship; acquire jobs with family sustaining wages in in-demand industries; transition to post secondary education or workplace training.
- Align with the skills needed of industries within the state and regional economies;
- Organize education, training and other services to meet the particular needs of students in a manner that accelerates their educational and career advancement to the extent practicable;
- Include advising and other student supports services to help students in achieving their education and career goals. Included is the development of a Personal Education Plan (PEP) that specifies the student's educational functioning level, learning needs, career interests, goals and plans for achieving economic self-sufficiency, indicates links to other resources and education and/or training towards the next steps on a student's career pathway and ensures seamless transitions from program to program (i.e. ABE/ELA to ASE or ASE to postsecondary education, training, and/or employment); and

- Provide integrated education and training that includes adult education and literacy activities with workforce preparation activities and workforce training for a specific occupation or occupational cluster.

There are multiple categories of grant funding available. The Comprehensive Services grants are designed to provide complete and uniform coverage across the state. Providers or consortia must provide comprehensive adult basic education services within a geographic region that equates to one or more WTCS districts (one or more providers may collaborate in how they provide coverage within the district). Allocation of funds are specified in the Geographic Region Allocation table shared below. Additional grant categories include Integrated English Literacy and Civics Education, and Adult Corrections Education and Re-Entry Services.

AEFLA COMPREHENSIVE SERVICES REGIONAL ALLOCATION

Regional Number	Regional Name
01	Chippewa Valley
02	Western
03	Southwest
04	Madison
05	Blackhawk
06	Gateway
08	Waukesha County
09	Milwaukee
10	Moraine Park
11	Lakeshore
12	Fox Valley
13	Northeast
14	Mid-State
15	Northcentral
16	Nicolet
17	Northwood

AEFLA Comprehensive Planning amounts are determined by a formula-based 40 percent on the five-year estimate of American Community Survey (ACS) census counts of working age adults (18-64) in a WTCS district who did not complete high school as a percentage of all working age adults in the state who did not complete high school. Ten percent are determined on the five-year estimates of American Community Survey (ACS) census counts of working age adults (18-64) in a WTCS district, whose ability to speak English is described as “Not at all” or “Not well” as a percentage of all working age adults in the state whose ability to speak English is described as “Not at all” or “Not well”. The remaining 50 percent of the formula is based on the number of the

district's Measurable Skill Gain counts over a three-year period as a percentage of Measurable Skill Gain counts across all districts over a three-year period.

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

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

II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS TO ALL ELIGIBLE PROVIDERS TO APPLY AND COMPETE FOR FUNDS AND HOW THE ELIGIBLE AGENCY WILL ENSURE THAT IT IS USING THE SAME GRANT OR CONTRACT ANNOUNCEMENT AND APPLICATION PROCEDURE FOR ALL ELIGIBLE PROVIDERS [(WIOA TITLE II SECTION 231(C)(1)-(2)).

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. They were offered in Spring 2024 for the next four-year grant cycle.

WTCS will continue to ensure that all eligible providers have direct 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 Department of Workforce Development Division of Vocational Rehabilitation provides many vocational rehabilitation services for core programs through contracted statewide service providers.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

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

The state will strive to make the management information systems interoperable between the WIOA Core Programs 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 Team: The ISD Data Steward Team will execute projects outlined in annual plans approved by Wisconsin's WIOA leadership. Specifically, the Data Steward Team 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. The Data Steward Team is comprised of representatives from WIOA Title I, WIOA Title II, WIOA Title III, and WIOA Title IV.

Policy 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 Team and Communications Team are comprised of representatives from WIOA Title I, WIOA Title II, WIOA Title III, and WIOA Title IV.

The Policy 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. An example is a project to share Customer Feedback Loops between the WIOA Title I, WIOA Title II, WIOA Title III, WIOA Title IV, TANF, SNAP-ET, and Registered Apprenticeship.
 - 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. WIOA Title II uses the WIOA Data Integration to identify the number of Title II individuals co-enrolled in other WIOA Core Programs for federal reporting purposes. 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.** The support is designed to make data available for research, and 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.
 - The state has procured the Administrative Data Research Facility (ADRF) data integration capacity through the Coleridge Initiative for the purposes of secure data sharing to facilitate evaluation activities. The ADRF is being used to host the Wisconsin Unemployment to Reemployment Portal which houses the Wisconsin Unemployment to Reemployment Dashboard and UI Equity related dashboards.
 - ADRF's five safes framework will be leveraged to support further data integration and evaluation as evidence plans dictate between the WIOA core programs, WIOA Title I, WIOA Title II, WIOA Title III, WIOA Title IV and WIOA partner programs, Trade Adjustment Assistance Act, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and Jobs for Veterans State Grant (JVSG).
1. **Safe Projects:** The ADRF contains only agency approved projects that have been proposed and agreed upon by project and dataset stewards. Approved projects require signed agreements and only approved members can access the project workspaces within the

platform. Project workspaces are isolated from one another with controlled access to resources through individual and group memberships.

2. **Safe Settings:** The ADRF is designed to provide secure methods of data transfer for agency micro-data, specifically data that includes Personally Identifiable Information (PII) in the datasets. Only agency identified and authorized personnel are invited to perform data transfers.
3. **Safe People:** Only approved researchers are permitted to access project workspaces and related resources. These individuals are required to go through our on-boarding process in which they must sign Data Use Agreements, Terms of Use, and complete an approved security training module before being granted access to the workspaces. Our security protocols follow strict FedRAMP guidelines and best practices.
4. **Safe Data:** In collaboration with our data curators and technology partners, we've developed a stand-alone Windows based application to help simplify and facilitate the hashing of data prior to transmission to the ADRF. The application can be downloaded directly to the operator's desktop and has no dependencies on external resources. It guides the user through the identification of the source file (with un-hashed data), selection of fields to hash, selection of basic data validation and identification of the target file to create (with hashed data). The default ADRF "salt" may be used or a custom salt can also be provided by the user.
5. **Safe Exports:** The ADRF prevents users from unauthorized removal of any information within the secure environment. Researchers seeking to export their work must do so through the export module within the ADRF. The export module allows researchers to verify that they are not requesting intermediate output and to provide the documentation needed for Coleridge staff and external data stewards to conduct a thorough disclosure review of the requested materials. Once an export request is initiated, Coleridge staff perform an initial review in accordance with the agency guidelines for each data set used to generate output. During the review, staff ensure that proper cell suppression has been applied, there are no complementary disclosures, rounding and noise have been applied where appropriate, and there are no references to specific observations or counts that would be disclosive. After the export request has passed internal review, it is then given a final review by the appropriate external data stewards before being released to the researcher. Coleridge staff maintain a log of export requests for auditing purposes and to evaluate subsequent requests by the same researcher for complementary disclosure.

Programs have also established individual linkages to administrative datasets for the purpose of assessments and evaluation. The WIOA Title I, WIOA Title III, and WIOA Title IV programs receive UI Wage records from DWD and are contracted with the National Student Clearinghouse information to satisfy federal reporting outcomes and evaluation requirements. WIOA Title II receives UI Wages from DWD, K12 education data from the Department of Public Instruction, and

National Student Clearinghouse data for credential outcomes to support reporting and evaluation purposes. Additional details on linking data are described in Sec. III.b.6.A.ii.

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

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 governance 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 the 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. DESCRIBE THE STATE'S DATA SYSTEMS AND PROCEDURES TO PRODUCE THE REPORTS REQUIRED UNDER SECTION 116, PERFORMANCE ACCOUNTABILITY SYSTEM. (WIOA SECTION 116(D)(2)).

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), the state UI wage record system, and the State Wage Interchange 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 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 that help workers achieve economic stability and mobility, while prioritizing every job seeker 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. 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 Governor's Council on Workforce Investment metrics.

C. 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

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.

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.

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) or Consolidated DVOP/LVER (CODL), 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 one or more employment barriers to DVOP/CODL staff, 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/CODL services. Veterans with employment barriers and/or other eligible persons may be referred for Disabled Veteran Outreach Program (DVOP) or CODL 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, veteran with an employment barrier, or other eligible individual has been deemed appropriate for DVOP or CODL services, the AJC staff member then notifies the DVOP/CODL staff either through email, phone or physically walking the individual over to the DVOP /CODL. The AJC is ultimately responsible for providing employment services to all registered individuals who are seeking assistance. The intent of assigning DVOP, LVER, or CODL 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 DVOP/CODL 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/CODL staff 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.

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.

DWD will ensure that all memorandums of understanding with WIOA partners include a statement ensuring priority of service will be provided and DWD LVERS will monitor to ensure priority of service is maintained. The level of priority of services is measure and reported for all covered entrants on each Quarterly Technical Narrative Report submitted to DOLVETS.

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 December 21, 2024, through December 20, 2026, 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.
- Works with DWD's Office of Legal Counsel to author, implement, and monitor 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:
 1. Element 1: Designation of EO Officer
 2. Element 2: Notice and Communications
 3. Element 3: Assurance
 4. Element 4: Universal Access and Affirmative Outreach
 5. Element 5: Compliance with Section 504 of the Rehabilitation Act of 1973 and The Americans with Disability Act of 1990
 6. Element 6: Data and Information Collection and Maintenance
 7. Element 7: Primary Recipient's Compliance with Monitoring Subrecipients Civil Rights Compliance Requirements
 8. Element 8: Complaint Processing Procedures
 9. 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 2025. 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 three years)
- Website Accessibility (annual)

The number of Certified Job Centers as of November 2025 is: 12 Comprehensive and 12 Affiliate, (24 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 INDIVIDUALS WHO ARE 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:

- **Steering Committee:** The ISD Steering Committee coordinates the work of the Integrated Service Delivery teams by fostering cross-agency collaboration and aligning priorities, workplans, and communications across WIOA programs and state workforce system partners.
- **Policy:** The ISD Policy Team is responsible for identifying and analyzing policies and best practices that support more aligned and integrated service delivery. The team is also responsible for recommending joint policies, actions, and tools that advance the WIOA State Plan's vision of an effective, accessible, and coordinated workforce system.
- **Communications:** The ISD Communications Team's purpose is 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.

Data Steward: The ISD Data Steward Team is to coordinate and operationalize how programs organize and prioritize activities to ensure shared data is trusted, understood, supports organizational goals, and fosters accountability. 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 planning 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:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes

The State Plan must include	Include
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	Yes

The State Plan must include	Include
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;	
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	Yes

The State Plan must include	Include
directly, in whole or in part, by the Department of Labor.	

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

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

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle 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 11 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

Local Areas	Name	Counties
WDA 3	WOW	Washington, Waukesha, Ozaukee
WDA 4	Fox Valley	Waupaca, Waushara, Winnebago, Calumet, Greek 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

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 how these co-enrollments vary across both demographic groups 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 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.

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 plan 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.

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.

See a.2.A

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)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

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 WORKERS 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) 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. 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. 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.

The local Workforce Development Boards (WDBs) may transfer up to 100 percent of formula funds of a program year allocation between the Adult Program and the Dislocated Worker Program.

On behalf of the Governor, 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 need. DWD-DET will serve as the approving authority for the WDBs funding transfer requests.

The local WDB initiates the transfer request by emailing a completed form to its assigned DWD-DET Financial Managers. The request must be made to DWD-DET at least 30 days before the end of the grant period.

The local WDB should take the following into consideration in making the request:

- Expenditures and obligations for the Adult Program and Dislocated Worker Program year formula funds;
- Availability of funds for both formula programs, including carry-in funding from the prior program year;
- The quarter of the grant period in which the request is made;
- Availability of Rapid Response and National Dislocated Worker Grant funding;
- Total enrollments in both Adult and Dislocated Worker formula programs;
- Total training enrollments in both formula programs;
- Applicability of Trade Adjustment Assistance 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 review the request and issue a determination within 30 days.

6. 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. 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. 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.

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.

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA.¹¹ 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.

¹¹ Sec. 102(b)(2)(D)(i)(V)

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.

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. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING 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 series in the fall of 2025 to bring together partners from across the state to increase communication and collaboration in the workforce system. The series included both virtual sessions and an in-person event. Each part of the series aimed to raise staff awareness of WIOA State Plan initiatives and programs, identify and address common questions, solicit feedback regarding challenges and barriers to effectively implement initiatives in an effort to determine opportunities for improvement, and offer suggestions and share best practices. This series offered participants a better understanding of the entire WIOA system so they may better coordinate services and align programs between WIOA Title and partner programs. This series also focused on identifying the needs and barriers inhibiting better WIOA collaboration and helping determine strategies to address those needs and barriers. 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.

Service Delivery Evaluation

DWD's Workforce Data Integration System (WDIS) will consult in an evaluation of 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 barrierred 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. 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 has established statewide youth practitioners call. This call brings together leaders from local workforce development boards (WDBs), career planners, and other youth serving organizations. This call provides 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 implemented 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.

As part of this monitoring strategy, 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.

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.

DET created a standardized Work Site Agreement template, which was released to local WDBs in September 2023. The template was developed upon request from local WDBs, and incorporated input from local WDB staff. Since providing the template, DET has seen a decrease in documentation errors identified through monitoring efforts.

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. 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 REQUIREMENTS

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)). States with a single workforce area must include—

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)
2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

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

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

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

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

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

6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.

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

7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.

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

8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

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

E. WAIVER REQUESTS (OPTIONAL)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;

2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;

3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;
4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
 - A. SUPPORTING EMPLOYER ENGAGEMENT;
 - B. CONNECTING EDUCATION AND TRAINING STRATEGIES;
 - C. SUPPORTING WORK-BASED LEARNING;
 - D. IMPROVING JOB AND CAREER RESULTS, AND
 - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER; AND
6. DESCRIBES THE PROCESSES USED TO:
 - A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
 - B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
 - C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
 - D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
 - E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.
7. THE MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

The State of Wisconsin, through the Wisconsin Department of Workforce Development (DWD) seeks approval of the following 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.

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.

The previously approved waiver during PY 2024 led to an increase in the number of in-school-youth (ISY) participants served, rising from 21% in PY 2020 to 36% in PY 2024. In PY 2024, approximately 11% of local formula funds were spent on ISY. As a result of this waiver, Wisconsin expects the number of in-school-youth (ISY) served will continue to increase or remain steady. Additionally, Wisconsin anticipates that performance accountability outcomes for overall WIOA Youth will remain steady or improve 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 that encounter barriers during their 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

Both the education and workforce system will be able to provide the benefits of this waiver to Wisconsin's youth with challenges. 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:

- 1. Monitor Waiver Implementation Progress**
- 2. Provide Notice to Local Boards**
- 3. Provide Local Boards Comment Opportunity**
- 4. Ensure Meaningful Public Comment**
- 5. Collecting and Report Waiver Outcome Information in Annual Report**

If renewed, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will continue to take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and 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 2026 – PY 2028 WIOA Combined State Plan modification, 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 March 3, 2026, through April 17, 2026.

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.

During PY 2024, the previously approved waiver supported strong overall outcomes for in-school youth and the broader Youth Program. ISY participation in employment opportunities increased by 47%, reflecting expanded access to work-based learning and career-connected experiences. The Youth Program also exceeded its performance targets, achieving 110% of its Measurable Skill Gains goal and 105% of its Credential Attainment goal.

While the number of ISY participants with an established ITA decreased from 43 in PY 2023 to 28 in PY 2024, the waiver enabled local areas to strategically align training investments with employment and credential outcomes. Building on these results, Wisconsin anticipates that ISY participation will increase or remain steady, and that overall WIOA Youth performance will continue to meet or exceed targets across the majority of 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 that encounter challenges 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

Wisconsin's in-school-youth who are low income and experience challenges would benefit from this waiver, which would provide greater training opportunities during their educations.

6. Processes Used to:

- 1. Monitor Waiver Implementation Progress**
- 2. Provide Notice to Local Boards**
- 3. Provide Local Boards Comment Opportunity**
- 4. Ensure Meaningful Public Comment**
- 5. Collecting and Report Waiver Outcome Information in Annual Report**

If renewed, DWD's Bureau of Workforce Training in the Division of Employment and Training (DET) will continue to take the responsibility of monitoring the waiver's implementation through quarterly desk reviews and 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 PY 2026 – PY 2028 WIOA Combined State Plan modification, 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 March 3, 2026, through April 17, 2026.

WAIVER REQUEST #3: ALLOW ALL TRAINING SERVICES TO BE PROVIDED THROUGH TRAINING CONTRACTS

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

Wisconsin is seeking a waiver from WIOA Section 134(c)(3)(F)(i) and (G) and 20 CFR 680.320(a) and 680.340(a) to allow for all training services to be provided through training contracts.

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 allow the Wisconsin DWD to use training contracts for individuals when contracts better meet employer needs and improve participant outcomes, rather than relying solely on Individual Training Accounts (ITAs) to fund training services.

Wisconsin will use this waiver to shift training investments toward employer-driven and work-based strategies that directly connect participants to employment. This waiver supports Wisconsin's goal to strengthen career pathways and career opportunities by:

- Stronger alignment between training provided and in-demand jobs
- Responding more quickly to employer hiring needs
- Expanding cohort, sector-based, and work-based training models
- Reducing the time it takes for participants to start and complete training
- Increasing employment, wages, and credential attainment
- Improving access for individuals with barriers to employment
- Increasing Registered Apprenticeship opportunities

Using training contracts for both individuals and cohorts will allow Wisconsin to design training around real job openings. Wisconsin expects to increase training opportunities for participants, training completion rates, employment and earnings, and credential attainment.

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

This waiver aligns and supports the Administration's Strategic Pillar I: Industry-Driven Strategies.

By allowing training services to be delivered primarily through contracts, Wisconsin will be able to design training directly with employers and providers, align curriculum to specific job openings, and quickly start individual training programs tied to hiring commitments. This flexibility will result in more efficient use of funds and better outcomes for both participants and employers.

5. Individuals Affected by the Waiver

Individuals that will benefit from this waiver include:

- Individuals with barriers to employment who may need more structured training
- Rural residents with limited training options
- Dislocated workers who need rapid reskilling
- Older workers and individuals changing careers
- Employers that need trained workers quickly

Wisconsin believes this waiver will increase flexibility, reduce administrative burden, and allow the workforce system to respond more effectively to employer demand while improving outcomes for participants. Participant outcomes are expected to include increased training completion rates,

employment in the second quarter after exit, median earnings for training participants, and credential attainment.

Wisconsin will track these outcomes quarterly using WIOA performance data, contract monitoring, and employer engagement metrics. Results will be reviewed with Local Workforce Development Boards and used to adjust training investments toward the highest-performing, employer-connected strategies.

6. Processes Used to:

- 1. Monitor Waiver Implementation Progress**
- 2. Provide Notice to Local Boards**
- 3. Provide Local Boards Comment Opportunity**
- 4. Ensure Meaningful Public Comment**
- 5. 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 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 2026 – PY 2028 WIOA Combined State Plan modification, 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 March 3, 2026, through April 17, 2026.

WAIVER REQUEST #4: YOUTH PROGRAM 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% of WIOA Youth who are otherwise required to be low income, but are not low income. Wisconsin is requesting to raise the limit of WIOA Youth participants who do not have to be low-income to 20%.

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

There are no state or local statutory or regulatory impediments 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 WIOA Youth who might otherwise be eligible for the program due to their identified challenges to education and/or employment, but are unable to be served due to their individual and/or family income. This waiver supports Wisconsin's goal to strengthen career pathways and career exploration opportunities while students are in K-12 education and provide all eligible students with the opportunity to participate in dual enrollment, earn a certificate/credential, enter pre-apprenticeship and Registered Apprenticeship opportunities, or participate in work-based learning prior to high school graduation.

As a result of this waiver, Wisconsin expects an increase in the number of WIOA Youth enrolled. Additionally, approval of this waiver will alleviate the administrative burden associated with enforcing the current 5% cap on WIOA Youth participants who are not low income. This burden arises when local programs must delay enrolling otherwise eligible WIOA Youth participants to ensure the 5% threshold is met by first enrolling a high number of WIOA Youth who are required to be low income and are low income. According to DWD-DET estimates, approximately 30,700 youth have a qualifying barrier but are not considered low-income based on the current Federal Poverty Level (FPL) and/or Lower Living Standard Income Level (LLSIL), representing 36% of Wisconsin's qualifying youth population. Increasing the cap to 20% would provide much-needed flexibility to Wisconsin's local Workforce Development Boards to operate the Youth Program and serve a greater number of youth participants.

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

This waiver aligns with U.S. Department of Labor's priority of advancing opportunity by ensuring youth have appropriate access to services and supports to achieve positive outcomes in high quality education and training. By serving more WIOA Youth who have eligibility barriers but are not low income, Wisconsin's local boards can provide greater accessibility to those youth in their local areas.

5. Individuals Affected by the Waiver

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. Additionally, out-of-school youth who have a secondary school diploma or equivalent and are basic skills deficient or English language learners, and out-of-school youth who require additional assistance, and are not low-income would benefit from this waiver.

6. Processes Used to:

1. **Monitor Waiver Implementation Progress**
2. **Provide Notice to Local Boards**
3. **Provide Local Boards Comment Opportunity**
4. **Ensure Meaningful Public Comment**
5. **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 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 2026 – PY 2028 WIOA Combined State Plan modification, 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 March 3, 2026, through April 17, 2026.

WAIVER REQUEST #5: IN-SCHOOL-YOUTH ENROLLMENT RESTRICTION

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

Wisconsin is seeking a waiver of 20 CFR 681.310(b), which limits local areas to serving no more than 5% of newly enrolled in-school youth (ISY) in a given program year under the “requires additional assistance to complete an educational program, or to secure and hold employment” eligibility criterion (see 20 CFR 681.220(d)(8)). Wisconsin is requesting to increase the cap on newly enrolled ISY using the additional assistance criterion to 20% to expand local flexibility where eligibility is determined solely under “requires additional assistance.”

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

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

Even so, Wisconsin has implemented several proactive, mitigating controls to ensure uniform and compliant use of the “requires additional assistance” criterion, including:

- Local plan requirements to specify whether the criterion will be used and, if so, to include ISY/OSY definitions in the Local Plan.

- State standards requiring local definitions to be reasonable, quantifiable, and evidence-based.
- State tracking, oversight, and fiscal accountability to enforce compliance with ISY restriction.
- Documentation tools to support case-file sufficiency.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver will increase flexibility for local areas in serving ISY whose barriers to education and employment are clearly articulated, documented, and objectively supported under locally defined “requires additional assistance” standards. Wisconsin's intent is to capture youth who are otherwise eligible but delayed, deflected, or denied enrollment due to the 5% cap on newly enrolled ISY using the additional assistance criterion in any given program year. This waiver supports Wisconsin’s goal of strengthening early, education-connected career pathways and engagement for barrierred youth.

Wisconsin recognizes and supports the underlying policy purpose of 20 CFR 681.310(b): to ensure the “requires additional assistance” criterion is used sparingly and does not become a default pathway for ISY enrollment in place of more specific eligibility barriers. However, in Wisconsin’s on-the-ground context and implementation, the restriction functions less as a system-wide safeguard and more as a binding local constraint that effectively caps the number of ISY who can be enrolled under this criterion in less-populated rural and suburban Workforce Development Areas (WDAs). This dynamic drives administrative burden and compliance-avoidance decisions that suppress enrollment of otherwise-eligible ISY whose barriers are appropriately captured under the “requires additional assistance” criterion—an outcome that conflicts with WIOA’s emphasis on early, preventative service to barrierred youth and disproportionately limits their access based on geography.

As a result of this waiver, Wisconsin expects an increase in the number of in-school-youth (ISY) enrolled. Additionally, approval of this waiver will alleviate the administrative burden associated with enforcing the current 5% cap on ISY participants using this criterion. This burden arises when local programs must delay enrolling otherwise eligible ISY participants to ensure the 5% threshold is met by first enrolling other participants. Increasing the cap to 20% would provide much-needed flexibility to Wisconsin's local Workforce Development Boards to operate the Youth program and serve a greater number of youth participants.

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

This waiver aligns with the Administration’s Strategic Pillar V: Flexibility and Innovation, and advances Pillar II: Skills and Career Pathways.

This waiver supports USDOL’s priorities of expanding access to workforce services and strengthening education-connected career pathways for youth by reducing compliance-driven enrollment suppression in small-denominator local areas. The waiver preserves program integrity

by requiring locally defined, evidence-based eligibility standards and consistent documentation for use of the “requires additional assistance” criterion.

5. Individuals Affected by the Waiver

This waiver will primarily benefit in-school youth whose eligibility is determined solely under locally defined “requires additional assistance” standards—particularly in WDAs with small or volatile annual enrollment cohorts where the current 5% cap is a functional constraint. The waiver is expected to increase access for ISY with documented barriers who are currently most likely to face the effects of compliance-driven enrollment decisions that arise from administrative burden.

6. Processes Used to:

- 1. Monitor Waiver Implementation Progress**
- 2. Provide Notice to Local Boards**
- 3. Provide Local Boards Comment Opportunity**
- 4. Ensure Meaningful Public Comment**
- 5. 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 continue to require local areas to maintain written definitions in the Local Plan and document eligibility determinations in the participant's case file using standardized documentation tools.

DWD-DET will monitor the waiver's implementation through quarterly desk reviews and during annual on-site monitoring, including review of local tracking mechanisms, case-file sufficiency, and adherence to the adjusted 20% cap on ISY enrollment under this waiver. 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 26 – PY 28 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 March 3, 2026, through April 17, 2026.

WAIVER REQUEST #6: COMPREHENSIVE AMERICAN JOB CENTER (AJC) IN EACH LOCAL WORKFORCE DEVELOPMENT AREA REQUIREMENT

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

Wisconsin is seeking a waiver of WIOA Section 121(e)(1) and 20 CFR 678.300(c). This waiver would permit local Workforce Development Boards (WDBs), in coordination with chief elected officials and required partners, to provide required one-stop services through flexible, locally responsive access models, while ensuring full and equitable availability of all required partner services.

Alternative access models may include affiliate and specialized centers, itinerant staffing, virtual and hybrid services, mobile outreach, and community-based access points.

These models will supplement, rather than replace, Wisconsin's integrated one-stop delivery system and will be implemented based on documented local needs, geography, and service utilization patterns.

Findings from the [June 2025 DWD/IRP Feasibility Study](#) indicate declining in-person traffic, uneven implementation, and structural fragmentation across regions. This waiver enables Wisconsin to modernize infrastructure in response to these documented conditions.

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

Wisconsin has implemented coordinated strategies to reduce geographic, transportation, and digital access barriers, including:

- Expansion of virtual and hybrid case management.
- Itinerant and rotating partner staffing.
- Deployment of Mobile Career Labs.
- Community-based access points, including library partnerships.
- Investment in broadband access and digital literacy.
- Strengthened cross-program referrals and data sharing.

These initiatives provide on-site technology and staff support where permanent facilities are impractical, complement comprehensive and affiliate centers, and expand system reach into underserved and rural communities, thereby reducing geographic, transportation, and digital access barriers.

3. Waiver Goals and Expected Programmatic Outcomes

This waiver aligns with Wisconsin's 2024–2027 Combined State Plan priorities to expand access to workforce services, strengthen employer and partner engagement, promote efficient use of public resources, and support economic resilience through innovation and technology.

The waiver supports improved access across urban, rural, and remote communities; enhanced alignment among workforce partners and community resources; increased workforce participation; and reinvestment of resources into direct services.

By permitting local areas to incorporate community partnerships, mobile services, and virtual delivery alongside traditional job centers, Wisconsin promotes system modernization while maintaining programmatic accountability and performance standards. The waiver does not require

adoption of any specific alternative service model, but allows for locally responsive implementation under state oversight.

Implementation of this waiver is expected to increase job seeker engagement, improve customer satisfaction, expand geographic service coverage, strengthen partner coordination, and promote more efficient use of workforce system resources while sustaining or improving performance outcomes.

Wisconsin projects the following measurable results:

- A 15% increase in virtual and community-based service utilization
- A 10% increase in participation in rural and underserved areas
- A 10 to 20% reduction in facility-related costs
- Increased reinvestment of savings into direct participant services
- Sustained or improved WIOA primary performance indicators

Outcome targets will be refined annually based on baseline data and system performance.

The [Feasibility Study](#) noted that current performance measures do not always reflect local realities, particularly in rural and high-barrier communities. Evaluation under this waiver will include qualitative and access-focused indicators to supplement federal metrics. Annual reviews will assess effectiveness and guide continuous improvements.

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

As described in USDOL Training and Employment Guidance Letter (TEGL) 05-25, this waiver would support innovation in alignment with the five strategic pillars for workforce investment. Specifically, this waiver aligns with the Administration's Strategic Pillar V: Flexibility and Innovation by allowing state and local communities more control to tailor solutions to their regional economies without being constrained by program rules or processes.

5. Individuals Affected by the Waiver

This waiver will benefit job seekers, particularly those in rural and geographically isolated communities, individuals with multiple barriers to employment, and populations that face challenges accessing centralized service locations.

Benefitting populations include youth, veterans, older workers, displaced workers, individuals with disabilities, individuals with limited English proficiency, individuals with limited digital skills, and individuals affected by housing instability, justice system involvement, or mental health conditions.

Employers will benefit from more accessible and streamlined recruitment, training, and workforce support services, while local Workforce Development Boards and one-stop partners will benefit from increased operational flexibility and improved system integration.

Consistent with findings from the Feasibility Study, which documented overlapping structural barriers and access challenges, Wisconsin will place special emphasis on ensuring adequate access for individuals with disabilities, limited English proficiency, and transportation limitations.

Existing investments in mobile, virtual, and community-based service delivery demonstrate Wisconsin's commitment to ensuring statewide access and will support expanded reach to underserved populations under this waiver.

6. Processes Used to:

- 6. Monitor Waiver Implementation Progress**
- 7. Provide Notice to Local Boards**
- 8. Provide Local Boards Comment Opportunity**
- 9. Ensure Meaningful Public Comment**
- 10. Collecting and Report Waiver Outcome Information in Annual Report**

If approved, the Wisconsin Department of Workforce Development (DWD) will evaluate the impact of this waiver using WIOA primary indicators of performance, customer satisfaction and feedback, service utilization and co-enrollment data, geographic and demographic access measures, and partner participation indicators.

Consistent with findings from the Feasibility Study, which noted that traditional performance measures may not fully reflect local conditions in rural and high-barrier communities, evaluation will incorporate qualitative and access-focused measures to supplement federal metrics.

DWD will monitor implementation through review of Individualized Service Delivery Plans, One-Stop Delivery System Certification, Memoranda of Understanding, Infrastructure Funding Agreements, and regular program and fiscal monitoring activities.

Annual reports will assess service access, partner participation, performance outcomes, and fiscal compliance, and will guide continuous improvement, technical assistance, and policy adjustments.

Wisconsin affirms that all required partner services will remain fully accessible under approved alternative delivery models. Partner contributions will continue to be documented through MOUs and IFAs, and all cost-sharing arrangements will comply with federal requirements.

Consistent with the Feasibility Study's findings regarding the complexity of WIOA funding streams, Wisconsin will maintain strong fiscal oversight and accountability. Implementation of this waiver will not weaken financial controls or compromise service quality.

The Wisconsin Department of Workforce Development (DWD) engaged state and local Workforce Development Boards, one-stop operators, required partners, community-based organizations, employers, and customers in the development of this waiver request.

Consistent with the June 2025 Feasibility Study, which reflected extensive engagement across all 11 Workforce Development Areas, stakeholder input regarding geographic access barriers, declining funding, and administrative burden informed both the design of this waiver and its implementation framework. Additional feedback was gathered through advisory committees and ongoing partner consultations.

DWD will post the proposed waiver for public comment for a minimum of 30 days prior to submission. The draft waiver will be made available through the DWD website, local WDB communication channels, and stakeholder distribution lists.

Public Comment Period:

Draft Posted: March 3, 2026

Comment Period Close: April 17, 2026

All public comments will be reviewed and considered prior to final submission to the U.S. Department of Labor.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes

The State Plan must include	Include
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

ADULT PROGRAM PERFORMANCE INDICATORS

Performance 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 two years covered by the

plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	74%	TBD	74%	TBD
Employment (Fourth Quarter After Exit)	75%	TBD	75%	TBD
Median Earnings (Second Quarter After Exit)	\$8,400	TBD	\$8,400	TBD
Credential Attainment Rate	65%	TBD	65%	TBD
Measurable Skill Gains	63%	TBD	63%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	79.0%	TBD	79.0%	TBD
Employment (Fourth Quarter After Exit)	77.0%	TBD	77.0%	TBD
Median Earnings (Second Quarter After Exit)	\$10,500	TBD	\$10,500	TBD
Credential Attainment Rate	71.0%	TBD	71.0%	TBD
Measurable Skill Gains	70.0%	TBD	79.0%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

YOUTH PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	76.0%	TBD	76.0%	TBD
Employment (Fourth Quarter After Exit)	76.0%	TBD	76.0%	TBD
Median Earnings (Second Quarter After Exit)	\$4,800	TBD	\$4,800	TBD
Credential Attainment Rate	61.0%	TBD	61.0%	TBD
Measurable Skill Gains	61.0%	TBD	61.0%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE STAFF

1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

Wisconsin will continue to staff labor exchange services under the Wagner-Peyser Act with state merit staff employees.

2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

Professional Development includes:

- State Coordinated Learning Center – Cornerstone – provides a wide variety of professional development opportunities for Job Service staff at no cost to the staff members, and can be accessed virtually;
- Staff participation in local, regional, and statewide seminars, conferences, and learning opportunities that focus on professional development, business services, successful outcomes for job seekers, best practices, and coordinated service delivery;
- 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.

3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

Although UI and Job Service are 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 12 Comprehensive and 12 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 W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

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.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

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.

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

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.

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

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 (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

MSFW Outreach staff coordinate outreach efforts with several internal and external partners including the Foreign Labor staff and enforcement agencies. These teams regularly schedule visits to various sites where MSFW live and work. During these visits, each partner is able to work collaboratively in the best interest of the workers.

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. PROVIDE AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

The State of Wisconsin's five most labor-intensive crops with the most acres harvested are potatoes, cranberries, cucumbers, apples, and ginseng.

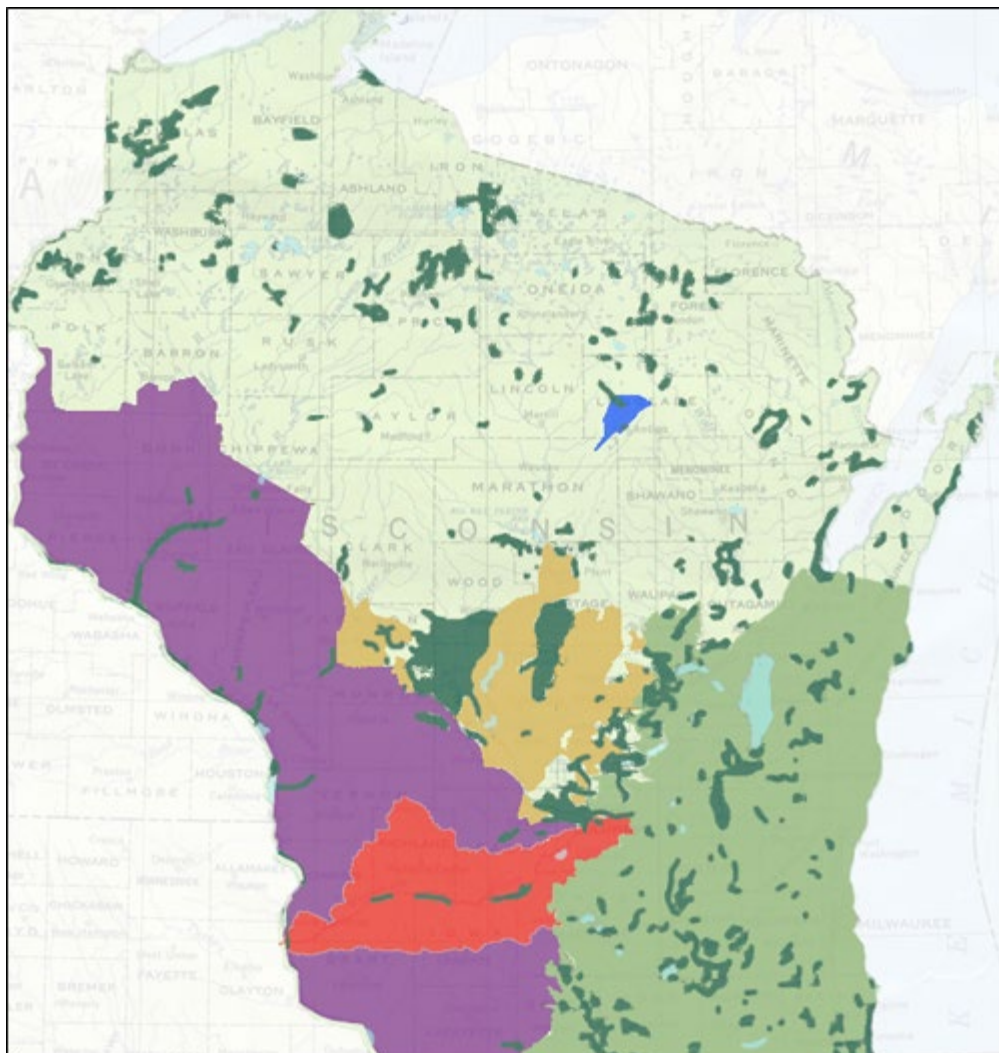
AOP Chart 1: Fruit and Vegetable Crops by Most Acres Harvested (Most Labor-Intensive Crops in BOLD)

Agricultural Commodity	Acres Harvested
Potatoes	70,110
Beans	63,842
Sweet Corn	56,615
Peas, Green, (EXCL Southern)	22,029

Agricultural Commodity	Acres Harvested
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



Source: 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

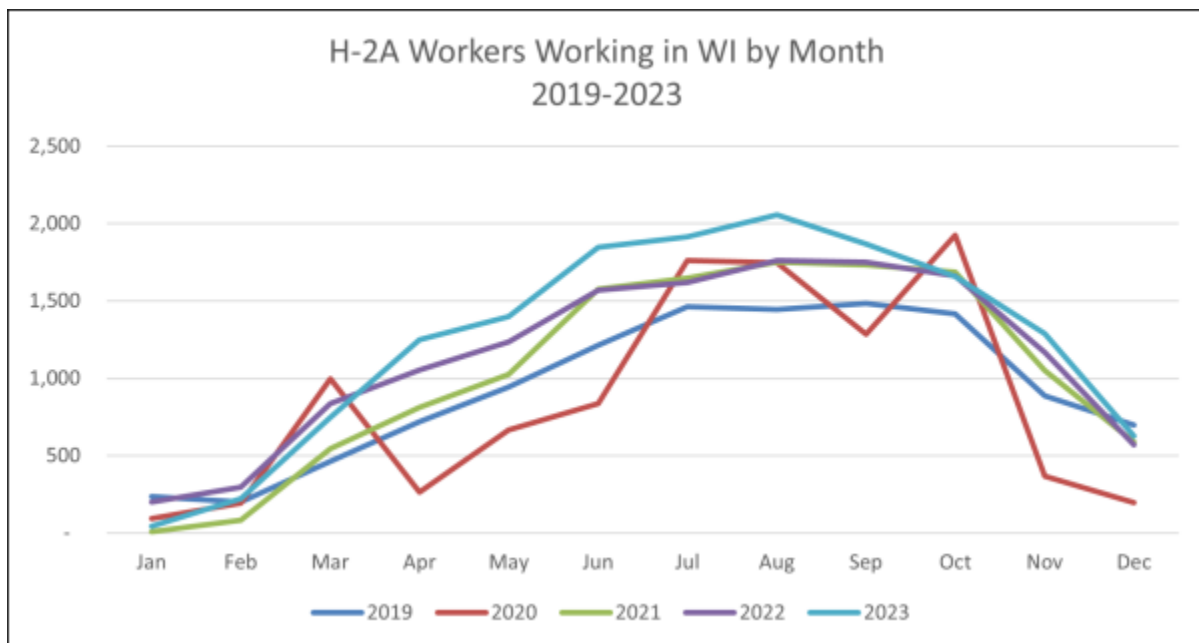
Counties	Acres of Cranberries
Wood	6,199

Counties	Acres of Cranberries
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. PROVED AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS 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 3,000 mobile migrant workers, the majority of whom are working in food processing facilities and about 3,000 H-2A visa workers (see AOP Chart 4) for a total of approximately 6,000 migrant workers in Wisconsin during peak season.

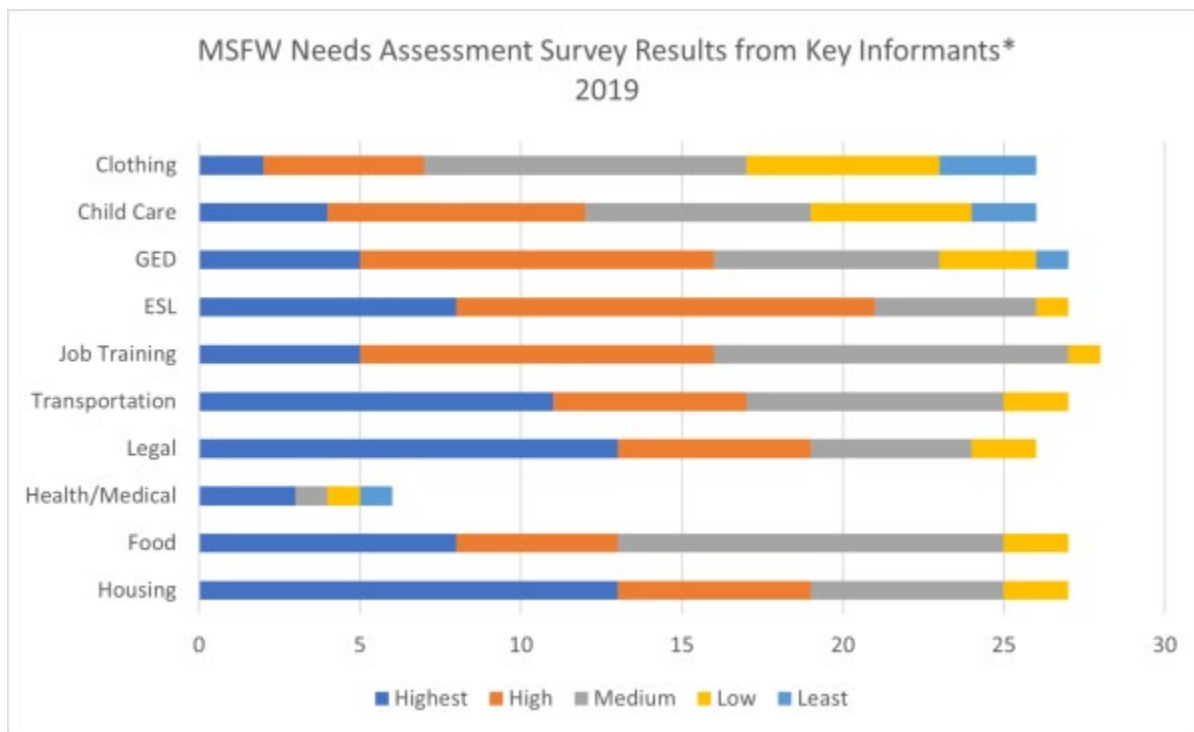
DWD conducts a survey of agricultural employers at the end of each year where we request the number of migrant and seasonal workers they hired; the results of this survey were used to estimate the number of non-H-2A MSFWs at 3,000 during peak season. In Wisconsin, the U.S. Department of Labor certified about 3,000 H-2A visas annually over the past three years. From conversations with employers and migrant labor contractors, not all of those visas are filled and some visa certifications are used by the same workers.

MSFW Outreach Specialist has been attempting to locate and contact MSFWs who are not being reached by the normal intake activities conducted by the ES offices but have not been successful in finding many additional seasonal agricultural workers, Wisconsin's primary agricultural product is dairy and dairy work is year-round. Some dairy farms contract out the seasonal crop work with associations who are using H-2A workers, so those workers are included in the estimate of migrant and seasonal farmworkers in the state.

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.

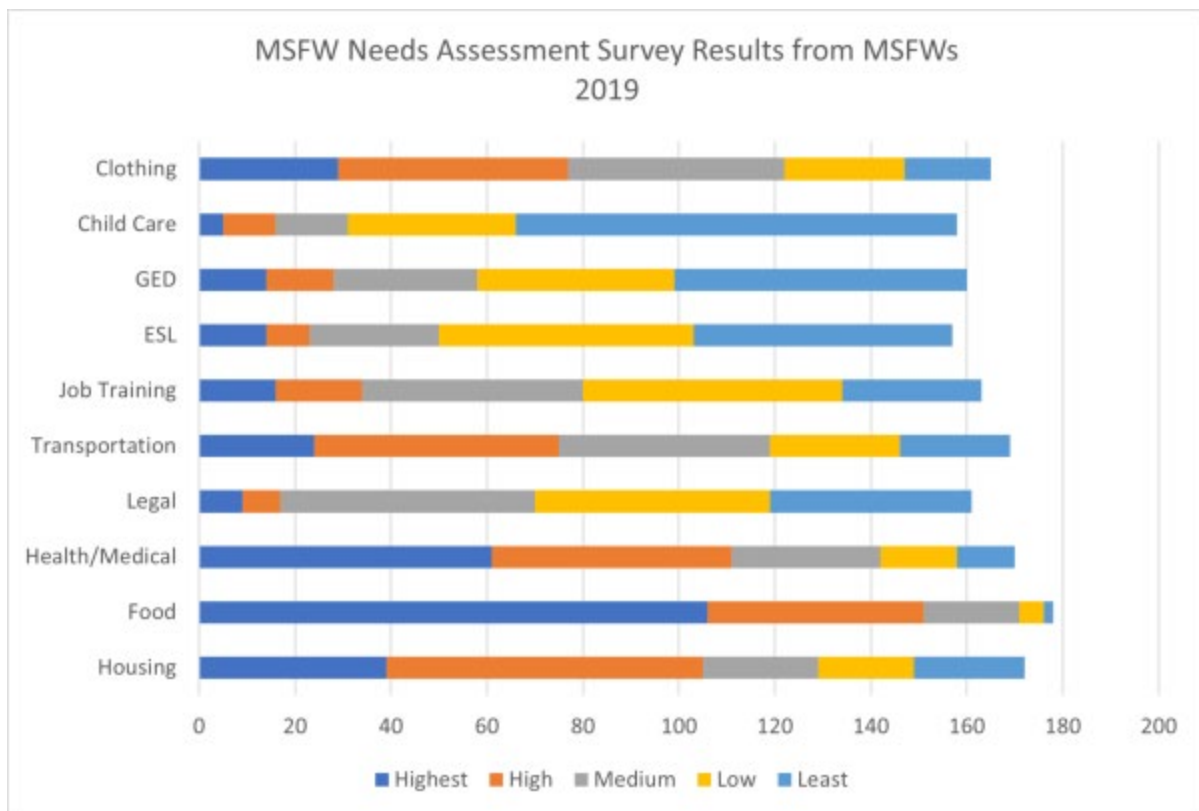
The National Farmworker Jobs Program (NFJP) in Wisconsin is United Migrant Opportunity Services (UMOS). UMOs has the NFJP grant and a number of other grants that assist migrant and seasonal farmworkers including running a migrant Headstart program. UMOs conducted an MSFW needs assessment. They completed 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. *NJFP 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



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.

The department participates in meetings of the Wisconsin Farmworker Coalition (WFC). In 2025, the Coalition, working with researchers from the University of Wisconsin -Madison, created a farmworker survey whose goal was to "collect information from Wisconsin farmworkers on their experiences and needs so that the WFC can best focus its efforts and provide the most responsive services and advocacy, as a collective and within individual agencies, organizations, and programs." The State Monitor Advocate participated in planning meetings for the survey and MSFW Outreach Specialists distributed flyers to encourage MSFWs to take the anonymous survey. Data collection concluded in December 2025, and results are expected in 2026.

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. Describe the State agency's proposed strategies for:

Strategies described in e.4.A - e.4.E

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES ON AN ONGOING BASIS. THE PLAN MUST IDENTIFY THE NUMBER OF FULL-TIME AND PART-TIME OUTREACH STAFF POSITIONS IN THE STATE AND MUST DEMONSTRATE THAT THERE ARE SUFFICIENT OUTREACH STAFF TO CONDUCT MSFW OUTREACH IN EACH SERVICE AREA OF THE STATE AND TO CONTACT A MAJORITY OF MSFW. THE PLAN MUST EXPLAIN THE MATERIALS, TOOLS AND RESOURCES THE SWA WILL USE FOR OUTREACH

The department plans to conduct robust outreach to known MSFWs and continue to locate and contact MSFWs who are not being reached by the normal intake activities conducted by the ES offices. 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.

Two full-time MSFW Outreach Specialists are sufficient to conduct MSFW outreach throughout the state of Wisconsin and contact a majority of MSFWs. In PY2024, due to staffing shortages, DWD only had one MSFW Outreach Specialist for Q3 and Q4. The one MSFW Outreach Specialist was also new and still in training. Even with the shortage of staff and a new trainee, DWD was able to reach

2,479 MSFWs. In PY2023, DWD had two full-time MSFW Outreach Specialists for part of the year, and reached 3,667 MSFWs, which is the majority of MSFW in Wisconsin.

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 which 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.

For years, the MSFW team has used established methods and tools to locate and then conduct outreach to MSFWs, including:

- Collaboration with the State Migrant Labor Law and the H-2A program (which require migrant housing inspections) so that information on those employers is shared with the MSFW Outreach Specialists, who then conduct outreach at the place of employment or at the housing.

- MSFW Outreach Specialists have access to the list of housing locations for all H-2A workers and any employers who house non-H-2A migrant workers.
- Connections with the Governor's Council on Migrant Labor (required as part of the State Migrant Labor Law), which includes employer representatives and migrant worker advocates. These close connections create a bridge to contact employers, conduct worker outreach, and gain information regarding the needs of migrant workers.
 - Many of the large food processing employers are on the Governor's Council on Migrant Labor and work closely with DWD. This relationship helps MSFW Outreach Specialist gain access to migrant and seasonal farmworkers and coordinator outreach visits during orientations, shift breaks, and share updates on worker arrivals and anticipated departures.
- Tracking outreach at locations identified in previous years so that MSFW outreach specialists can conduct outreach at those locations each year.
- Utilizing a tablet to provided onsite translation for workers who do not speak English or Spanish.
- Utilizing a tablet, laptops, and hotspot to provide employment services onsite for MSFW who are not able to visit a job center.

State issued cell phones that allow workers to communicate with MSFW Outreach Staff using text, email, and WhatsApp to assist in services, filing complaints, and making referrals.

In addition to these established methods, in PY24, the MSFW outreach specialists incorporated additional activities to locate MSFWs not previously contacted, including:

- Contacting employers who responded to the prevailing wage survey indicating they hire local seasonal farmworkers.
- Contacting employers advertising for seasonal farmworker positions on platforms like Indeed.com, to identify potential MSFW employers who are not currently using DWD's labor exchange.
- Contacting employer agricultural associations for seasonal crops (such as the Cranberry Growers' Association) to identify additional employers and determine if they hire seasonal farmworkers.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF.

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 WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES

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.

In December 2024, a cross-training with DWD MSFW Outreach Specialists and NFJP program staff, which included a refresher overview of what each team does, information on the Complaint System, and information on outreach collaboration and referrals.

D. PROVIDING STATE 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.

The Bureau of Job Service hosts a monthly all staff call which is utilized to provide trainings to all job service services and partner services. Training topics include:

- Recording services in ASSET (the state's WIOA services tracking system).
- WIOA data validation requirements for providing services.
- Updates on resume writing.

- Employment Services and Employment Law Complaint System.

In addition to these monthly staff calls, the Bureau identifies other professional development trainings needed annually. These trainings have included topics such as mental health first aid. Specific training will include Human Centered Asset-Based Coaching, Motivational Interviewing, Trauma Informed Care, Group Discovery, Personal Profiles and Conditions of Work. MSFW Outreach Staff are required to take at least one training each quarter that assists in their professional development. The Department of Workforce Development offers an array of trainings through their Staff Development section including trainings on Microsoft products, Strategies for Building Resilience, Effective Communication, Emotional Intelligence and Communication, etc.

Recently, recorded trainings on MSFW topics and the Complaint System have been placed into the department's online training platform, allowing managers to assign trainings during onboarding and as a refresher as needed.

Additionally, the United Migrant Opportunity Services (UMOS) has an anti-labor trafficking initiative. A training will be provided to all MSFW Outreach Specialist regarding identifying labor trafficking.

E. 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 grantee which is UMOS, the Wisconsin Department of Public Instruction's Migrant Education program, UMOS' other migrant programs - Migrant HeadStart, the Latino Resource Center's Anti-Human Trafficking Team, Migrant Housing, Madison College's HEP Program, the Mexican Consult of Milwaukee, Noble Community Clinics (formerly called Family Health LaClinica), 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

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. MARKETING THE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER STAKEHOLDERS

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. In 2025 a refresher training on the complaint system was provided to Job Service staff and a recorded training was included on the department's online training platform, Cornerstone. Staff were also provided a quick guide for completing the ETA 8429.

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.

The department participates in an annual Pre-Season MSFW Meeting with partner agencies including farmworker advocacy groups like the UMOS, Noble Community Clinics, Women's Community, and other agencies. The department markets the employment services and employment related law complaint system and the ARS to these partners and other state agencies that provided services to MSFW like the Wisconsin Department of Public Instruction's Migrant Education Program and Madison College's HEP Program.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

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 visa program 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 visa program.

Additionally, presentations to employers and employer organizations like the Midwest Foods Products Association and an employment-related law series the the department hosts called Friday Fundamentals will include information marketing ARS to employers.

6. OTHER REQUIREMENTS

A. SIGNIFICANT ONE-STOP CENTER STAFFING

If the SWA has significant MSFW one-stop centers, describe how the swa intends to provide es staff in the significant one-stop center in accordance with 20 CFR 653.111

Wisconsin has one significant MSFW One-Stop Center, the Dane County Job Center. The department will work internally with the human resources department to utilize a position description that places a strong emphasis on hiring and assigning qualified candidates who speak Spanish, the language spoken by a majority of the MSFWs in Wisconsin, and come from MSFW backgrounds or who have substantial work experience in farmworker activities.

The department will share the job posting with farmworker organizations and other organizations who work with MSFWs and encourage them to promote the posting within their network. The department has contacts with several partner agencies including, UMOS, Noble Community Clinics, the Department of Public Instruction's Migrant Education Program and Madison College's HEP Program who will be asked to share the posting. The job posting will also be promoted in the local job centers to assist in finding candidates that meet the qualifications.

B. 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 in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

An updated Memoranda of Understanding (MOU) between the department's State Monitor Advocate and the NFJP, UMOS was signed in June 2025. The MOU highlights continued collaboration for coordinating services and education about the complaint system.

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.

The department intends to build upon and increase collaboration with existing partners and establish new partners over the next four years through annual pre- and post-season meetings, regular meetings and communication with the different MSFW programs provided through UMOs. UMOs's labor trafficking multi-disciplinary team include DWD and meets monthly. This monthly meeting increases the collaboration between agencies and provides DWD with information on additional agencies that may provide resources to MSFWs.

The SMA's quarterly communication with the NFJP will also be another method for information sharing. The SMA is then invited to weekly outreach meetings that allow the sharing of information to MSFW Outreach Specialist and managers.

New partners identified through these various collaboration methods will be communicated to directly by the MSFW Section Chief to establish a new relationship and discuss ways to partner and any appropriate agreements that may need to take place.

Currently, UMOs's labor trafficking multi-disciplinary team and the department are discussing an agreement to allow for data sharing regarding complaints and apparent violations. The timeline for reviewing the agreement is the summer of 2024.

C. 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.

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) and did not receive any feedback or suggestions at this stage in the process. The organizations/employers contacted include:

- NFJP (UMOS)
- UMOs (Migrant Head Start, Anti-Human Trafficking Team, UI Navigator Grantee)

- Noble Community Clinics (formerly 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.

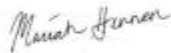
The AOP states that Wisconsin has not been consistently meeting its goal of providing MSFW quantitatively proportionate services as compared to non-MSFWs over the last four years. The underserving of MSFW is troubling.

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! For help using online services, or for questions not answered online, call (414) 435-7069 or toll-free (844) 910-3661. Help Center Business Hours: <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> * Mondays and Tuesdays are our busiest days. To reduce your wait time, call on other days of the week.	Wednesday - Friday	6:15 AM - 5:30 PM	Saturday	7:00 AM - 1:30 PM	Monday - Tuesday*	6:15 AM - 5:30 PM	¡Ayuda! 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. Horas de Oficina del Centro de Ayuda: <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> * Los lunes y martes son nuestros días más ocupados. Para reducir su tiempo de espera, llame otros días de la semana.	miércoles - viernes	6:15 AM - 5:30 PM	sábado	7:00 AM - 1:30 PM	lunes - martes *	6:15 AM - 5:30 PM	Pab! Mus nrhiar kev pab siv cov kev pab online no, looyog koj mus tos tauonline tiag, hu (414) 435-7069 kussis hu dawb ntawm (844) 910-3661. Chaw Pab lub Sijhawm ua Haujwm: <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> * Hrub Monday thiab hrub Tuesday yog peb ob hrub uas sibneeg hu tauj coob tsahj. Kom txo koj lub sijhawm tos, hu rau lwm lub hrub ntawm lub lmtiam.	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

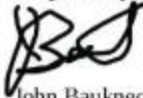
Section 4, 1.1, of the Plan states:

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 bilingual 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 read 'JB', with a long horizontal stroke extending to the right.

John Bauknecht
Special Assistant to the President Emeritus
United Migrant Opportunity Services/UMOS Inc.

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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 through 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

Review the previous four years Wagner-Peyser 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.

DWD welcomes the technical assistance of DOL in reviewing how RESEA RSEA impacts performance for MSFW equity.

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.

The department achieved the goals listed in previous AOP. Specifically goals included coordinating outreach efforts with Family Health La Clinica mobile medical unit and provide services at several agricultural employers across the State including participation in UMOs Farmworker Appreciation Day picnic. Especially during COVID, outreach coordination and collaboration with Family Health La Clinica provided access to the COVID-19 personal protective equipment, education, and COVID-19 vaccines through the mobile medical unit.

MSFW Outreach Specialists attended development activities such as the WIOA Roundtable, DOL's Agricultural Seminar, and trainings from OSHA. MSFW Outreach Specialists were also provided technical assistance and trainings on Employment Service Complaint System, a review of the

summary of farmworker rights and a review of the required services to be provided during outreach along with a review of the desk aid and how to properly report services in ASSET, the state reporting system.

The department hosted pre-season meetings. Post season meetings were not held and this gap in achievement will be remedied with the new AOP and will be held in upcoming years.

The department also met the goal of continued collaboration with partners through the Wisconsin Farmworker Coalition. The department attends and participates in the meetings where migrant worker advocacy groups lead in discussing issues that may affect seasonal agricultural workers.

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 MSFW 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 State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: 1) Initiate the discontinuation of services;	Yes

The State Plan must include	Include
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.	
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

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	68.0%	TBD	68.0%	TBD

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Fourth Quarter After Exit)	67.0%	TBD	67.0%	TBD
Median Earnings (Second Quarter After Exit)	\$8,500	TBD	\$8,500	TBD
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

PROGRAM-SPECIFIC REQUIREMENTS FOR 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 (WIOA SECTION 102(B)(2)(D)(II)(I))

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)).

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 Wisconsin adult education content standards are aligned with standards adopted by the Wisconsin Department of Public Instruction through the Common Core State Standards (CCSS). The CCRS for Adult Education are a subset of the CCSS, selected by a panel of representatives from the fields of adult education, community colleges,

career and technical training, and the military charged by the U.S. Office of Career Technical and Adult Education (OCTAE) to identify which of the CCSS were most essential for college and career readiness and important to adult students. 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 ELL curriculum undergoes a faculty review every 5 years as part of continuous improvement. The 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.

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—

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.

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 16 years of age (AEFLA funds may not be used to serve students in

the traditional K-12 system or of compulsory education as outlined in the State of Wisconsin Statue 118.15) ; (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 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. 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, workplace adult education and literacy 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 2024, the WTCS held an open competition with funded activities starting on July 1, 2025. Open grant competitions for FY28/29 and beyond 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
(WIOA SECTION 102(B)(2)(D)(II)(BB))

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 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.

Grants will be competitively awarded on a four-year cycle, with WTCS AEFLA Grant Application continuation required each fiscal year of the grant period. Applications will be reviewed by WTCS staff to ensure they remain aligned with the goals and objectives of Wisconsin's WIOA local plans. 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.

Eligible providers will deliver educational programming for adult offenders in correctional institutions, including:

1. Adult education and literacy services;
2. Secondary credit and credentials;
3. Integrated education and training;
4. Career pathways;
5. Concurrent enrollment;
6. Peer tutoring; and
7. 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 (WIOA SECTION 102(B)(2)(D)(II)(I)(CC))

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 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. Open grant competitions will be held every four years. In 2024, the WTCS held an open competition with funded activities starting on July 1, 2025. Applicants are 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 (WIOA SECTION 102(B)(2)(D)(II)(III))

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

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 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. 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, 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 quarterly 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 quarterly 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 quarterly 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.

F. ASSESSING QUALITY (WIOA SECTION 102(B)(2)(D)(II)(V))

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.
- **Quarterly AEFLA Data Reporting & Performance Accountability Monitoring Report** – The WTCS will continue to generate the AEFLA Data Reporting & Performance Accountability Monitoring Report on a quarterly 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. The WTCS conducts quantitative, qualitative, or mixed methods research to explore various research topics. The WTCS prioritizes 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, 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
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

The State Plan must include	Include
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

The State Plan must include	Include
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this

transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to wioa@ed.gov at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA SECTION 427 FORM INSTRUCTIONS FOR STATE APPLICANTS

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the

proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA SECTION 427 INSTRUCTIONS TO STATE APPLICANTS FOR THEIR SUBRECIPIENT APPLICANTS

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

- The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or
- The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.
- The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries

have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

STATE APPLICANTS MUST RESPOND TO FOUR QUESTIONS. THE FIRST OF FOUR QUESTIONS IS:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The Wisconsin Technical College System (WTCS) receives Title II funding from the U.S. Department of Education's Office of Career, Technical & Adult Education (OCTAE), and grants these funds out to eligible providers through a competitive grant process, per WIOA Section 231(a). Wisconsin's eligible institutions, colleges and community-based organizations ensure equal opportunities to participate for all eligible students, teachers, and other program beneficiaries in any project and/or activity carried out under the applicable program, such as adult basic education, and promotes the ability of such students, teachers, and beneficiaries to meet high standards.

COMPETITION EQUITY

WTCS holds an open competition and requires local providers to provide assurances that they will fully implement the requirements and activities authorized under section 427 of the General Education Provisions Act (GEPA). WTCS ensures that all grant competition announcements, information and training is available to potential providers/grantees in an open, transparent and equitable manner. The funds are made available through a competitive application process, and the grant announcements will be disseminated to current providers and the public utilizing the same time, date and format of announcement. The grant opportunities are also posted on the agency's website, shared through regional media, and posted on the state's VendorNet informational website. All eligible providers have an equitable opportunity to pose questions and receive answers, which are shared with the general public. All grantee applications are evaluated using the same scoring criteria which aligns with the directions contained in this Plan and the 13 considerations required by federal WIOA legislation. Additionally, statewide geographical distribution of funds is utilized to ensure that all Wisconsin citizens can access local adult education and literacy programming, with providers asked to ensure that services are offered, when possible, at varying times and days and through alternative delivery methods including distance delivery. These grants will be awarded on a four-year basis, with updated applications due each year.

The competition review panel is composed of individuals selected for their experience in adult and postsecondary education, training, and workforce development. This panel is trained by the WTCS Grants Management team prior to the review and scoring of applications, based on the criteria in the Applications Scoring Rubric. Applications are first reviewed to determine if the

applicant meets the definition of “eligible provider of demonstrated effectiveness.” If they do not meet this standard, the application is not to be scored. Additionally, as required under WIOA, representatives from each of Wisconsin’s local Workforce Development Boards (WDB) are asked to review the applications to encourage consistency and alignment with the strategic goals and objectives in Wisconsin’s WIOA local plans. The WDB submits comments to the WTCS, which are considered in the application review process.

WTCS ensures equitable access to, and participation in, all projects and activities as required under WIOA, Perkins and other federal education funds. Providers and programs utilizing these funds identify and address the needs of students, faculty, and other program beneficiaries to overcome barriers to programming and participation, including but not limited to barriers of gender, race, color, national origin, disability, and age. WTCS provides various learning and professional development opportunities to WTCS employees as well as providers, which includes providing accommodations for individuals with disabilities. WTCS ensures that all education and training providers give equal and equitable access to all programs, projects and activities through ongoing monitoring and technical assistance processes.)

Compliance can be found on the following page(s) of the application:

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	42.6%	TBD	42.7%	TBD
Employment (Fourth Quarter After Exit)	43%	TBD	43.1%	TBD
Median Earnings (Second Quarter After Exit)	\$6,102	TBD	\$6,103	TBD

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Credential Attainment Rate	64.2%	TBD	64.3%	TBD
Measurable Skill Gains	51.2%	TBD	51.3%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. 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

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, 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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	2	September 2024
Parent Training and Information Center	VACANT	July 2025
Client Assistance Program	1	August 2025
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2	June 2023
Community Rehabilitation Program Service Provider	2	July 2025
Business, Industry, and Labor	2	June 2023
Business, Industry, and Labor	2	July 2025
Business, Industry, and Labor	2	June 2023
Business, Industry, and Labor	1	August 2025
Disability Advocacy Groups	2	July 2025
Disability Advocacy Groups	1	July 2024
Disability Advocacy Groups	1	June 2023
Disability Advocacy Groups	2	July 2025
Disability Advocacy Groups	VACANT	July 2025
Disability Advocacy Groups	2	June 2023
Disability Advocacy Groups	2	July 2024
Current or Former Applicants for, or Recipients of, VR services	VACANT	July 2024
Current or Former Applicants for, or Recipients of, VR services	1	January 2024

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Section 121 Project Directors in the State (as applicable)	1	April 2025
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2	July 2023
State Workforce Development Board	VACANT	July 2025
VR Agency Director (Ex Officio)	2	August 2024

3. 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) has vacancies in the composition requirements for members representing the Council on Workforce Investment, Parent Training and Information Center and Section 121. The WRC's Engagement Committee monitors WRC composition and leads recruitment efforts. The Engagement Committee reports to full WRC on current and future vacancies at quarterly WRC meetings. The WRC and DVR solicit ideas and strategy to recruit necessary members, and advance candidates per state requirements. The WRC and the Engagement Committee are actively recruiting for these positions. WRC will review progress toward filling the vacancies at quarterly Council meetings to determine whether role has been filled. In addition, DVR has been working with Wisconsin Governor's Appointment Office in follow up with applications submitted.

4. 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 September 2025, DVR informed the Wisconsin Rehabilitation Council (WRC) of the State plan modification requirements and timelines. In support of state plan work, DVR reviewed the 2024 Comprehensive Statewide Needs Assessment (CSNA) with WRC committee and full council meeting in early 2025. Additionally, DVR sent a summary of the CSNA recommendations, WRC's recommendations in current State Plan, goals in current state plan, and DVR's suggested goals incorporating information from new CSNA to WRC members in October 2025. At a combine WRC committed meeting on October 30, 2025, DVR reviewed this information with the combined committee and requested their recommendations and input. DVR also reviewed and highlighted the overall updates made to the required 2-year state plan modification on November 20, 2025.

On November 5, 2025, DVR met with the WRC to discuss the need to establish an order of selection.

Order of Selection:

The Division notified and consulted with the WRC about fiscal projections indicating the imminent need to establish order of selection, closing all categories, during a scheduled public meeting of the WRC Full Council on November 5, 2025. Specifically, the meeting highlighted:

1. The need to establish an Order of Selection
2. Three priority categories and current caseload breakdowns by priority categories for VR cases and those receiving Pre-Employment Transition Services (Pre-ETS) services.
3. Priority criteria across DVR's three categories (MSD/SD/D)
4. Review of DVR's policy and two-tier statewide administration of the waitlist (first by the need for retention services, disability priority, and second by application date), and appealing a priority category assignment.
5. Review of state plan and WRC recommendations. An additional recommendation was added along with a DVR response.

A public meeting was held on November 13, 2025 to notify the public of DVR's intent to close all categories. An individual meeting occurred with the Client Assistance Program representatives on October 31, 2025.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

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 Customer Experience Action Plan, and the 3-year Comprehensive Statewide Needs Assessment (CSNA), has strategies related to obtaining consumer feedback to help improve the consumer experience. DVR collaborated with UW-River Falls and experimented with a process that used text messages to survey DVR consumers in Milwaukee County at specific points in the DVR process. We will be evaluating this project and continue to look for methods to improve information we get about DVR. 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 DVR presented our response to the recommendations and reviewed the 2026 State 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 10-15%,

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 and to expand existing service 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. There are elements of this recommendation that are outside of the control of DVR, e.g. labor market and economy conditions, service provider are independent businesses and not employees of DVR.

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 resources that would help reinvigorate training in employment-related services for service providers across the state.

DVR Response:

DVR has previously worked with the 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. Information on various training opportunities has been and will continue to be sent to all active DVR service providers. DVR has also been researching the implementation of qualification standards for service provider staff providing direct consumer employment services such as job development including supported employment and systematic instruction. 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 if DVR's budget allows may also investigate 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:

The WRC recognizes the increase in cases coming to DVR, rising costs, and limited funding which necessitates a wait list for services. DVR will be asked to provide updates on the waiting list, continued cost efficiencies and the continued need for an order of selection at each quarterly WRC meeting.

DVR Response:

DVR agrees with this recommendation. DVR will continue to monitor spending, explore cost efficiencies, and provide updates on the status of the order of selection at each quarterly WRC meeting.

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;

Wisconsin DVR completed a Comprehensive Statewide Needs Assessment (CSNA) at the end of December 2024 and received and reviewed a final report in early 2025. The information in this report was obtained from surveys, interviews, focus groups, community meetings, and case management data.

Individuals with the most significant disabilities make up the majority of the DVR population at 50.6%.

Individuals with the most significant disabilities are represented highest in age group 18-34 compared to the age group 75 and older which had the smallest percentage of individuals in with the most significant disabilities.

Individuals with the most significant disabilities have the lowest successful closure rate of 44.1% compared to the next highest closure rate of 48.1% for consumers with a significant disability.

CSNA analysis indicates that individuals with a most significant disability have an unmet need for mental health supports. Mental illness comprises a large segment of consumers with a most significant disability. One in five DVR consumers over the past three years was listed as having a disability related to mental illness and mental health services are repeatedly mentioned as a service need. Further, the incidence rate of co-occurring mental health conditions in individuals with intellectual and developmental disabilities is high: with research indicating rates between 37% and 45%. (Lineberry, S., Bogenschutz, M., Broda, M., Dinora, P., Prohn, S., & West, A. (2023). Co-Occurring Mental Illness and Behavioral Support Needs in Adults with Intellectual and Developmental Disabilities. *Community mental health journal*, 59(6), 1119–1128. <https://doi.org/10.1007/s10597-023-01091-4>)

With the considerable rate of individuals with mental health as a primary diagnosis, in addition to the rates of co-occurring mental health diagnosis, we know that mental health is a considerable need for individuals who are most significantly disabled.

The number of Supported Employment (SE) providers and their ability to staff the amount of hours needed for DVR Supported Employment consumers has been declining, according to qualitative research conducted with these providers as well as a few comments by DVR staff. Analysis indicates that different reimbursement models for services by other entities, e.g. county mental health Medicaid funded services for Individualized Placement and Support (IPS), and lack of trained service provider staff, may contribute to the unmet need for this service category as a whole. DVR recently increased rates twice for most categories of service and this change may not yet have been fully absorbed by the service provider population at the time this research was conducted.

However, successful closures for individuals with the most significant disabilities are not substantially less than the successful closures of individuals with a significant disability (rates of success are only slightly below individuals with significant disabilities). Individuals with a most significant disability were not a major concern of staff or providers in focus groups, and spending patterns for DVR services show that individuals with a most significant disability routinely receive high levels of spending. In survey responses, individuals with a most significant disability were no less likely to recommend DVR services to others, nor were they more likely to report there were services they required which were not received. These outcomes suggest that DVR services are well suited to meeting the needs of many individuals with a most significant disability.

However, within specific categories of individuals with disabilities, there are clear unmet needs. Services for individuals with mental health related disabilities—the largest group within individuals with the most significant disability category—were widely seen as inadequate in both quality and supply. Additionally, service providers felt that rates were inadequate to support Supported Employment services provided to DVR cases.

B. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

Data shows that race characteristics are a major factor in the likelihood of success in Wisconsin. While Asian and White individuals closed their case with employment 58% and 49% of the time respectively, Black or African American individuals closed their case with employment only 33% of the time, a pattern which was also observed in rates of DVR spending. Though some of these differences are likely due to structural barriers to employment as their unemployment rate is almost twice as high as amount the population overall (State Unemployment by Race and Ethnicity – 2024 Q4 – Economic Policy Institute), this pattern was also observed in rates of DVR spending. Black or African American individuals received around 52.8% of the median case spending. Black or African American consumers were notably more likely than Whites to report that there were services they needed but did not receive (about a 16 percentage point difference). Native Americans also saw meaningfully different outcomes than the majority of DVR consumers at 37% having cases closed with employment and had lower median case spending by DVR.

Some groups of minorities are represented in the DVR service population at rates different than expected when considering their rates in the general population within the VR service age. Black or African American represented 16% of DVR caseloads and 10.3% of the general population. White represented 73.2% of DVR caseloads and 80% of the general population.

Race	DVR %	ACS %	ACS (VR Service Age)
White	73.2%	80.40%	79.9%
Black or African American	16.0%	5.97%	10.3%
American Indian or Alaska Native	3.0%	*	1.3%
Asian	1.9%	2.94%	1.8%
Native Hawaiian or Other Pacific Islander	*	*	*
Some Other Race Alone	N/A	1.96%	1.9%
Population of two or more races	3.7%	7.93%	4.7%
Undefined	1.9%	N/A	N/A

*=less than 1%

ACS = American Community Survey

However, DVR staff did not report Black or African American consumers as being more likely to be underserved compared to other racial or ethnic minority groups. Survey results indicate that DVR staff were as likely to report that Black or African American individuals were unserved as they were to report that Hispanic and Asian individuals were unserved. However, Hispanic individuals have almost identical case spending and outcomes compared to White individuals, and Asian individuals have somewhat better outcomes and a higher median case spending. Individuals who were Black or who lived in urban areas did not rise as a topic of discussion in focus groups or interviews consistently. Black or African American consumer survey respondents were somewhat less likely to

agree to a variety of positive statements about their VR case contact, but most indicated respect for their autonomy and choices, and respect for cultural background and identity. These results suggest that DVR's efforts to improve staff awareness of the struggles of racial and ethnic minority individuals have been effective, but that DVR staff may benefit from additional information celebrating the successes of minority populations for whom services have been effective.

Findings indicated that service needs for members of minority groups had similar trends to the overall service needs of the DVR population. Technology, physical access to services, and a good supply of businesses that could hire DVR consumers are needed to address underserved and unserved minority groups. Furthermore, individuals who are minorities have transportation, job coaching, and training needs. More than half of staff express the desire for more training in working with those populations they identify as underserved.

Interview and focus group participants were asked if they felt there were any high-risk populations who were being underserved by VR. All focus group and interview respondents identified at least one underserved or unserved population. Survey data from staff, service providers, and consumers identified that the most frequently mentioned groups of underserved and unserved individuals include:

- Those who are transient or are unhoused (identified by a majority of respondents in both sets of surveys)
- Those with behavioral and mental health concerns, including those struggling with substance use needs
- Those who are incarcerated or involved with the juvenile justice system
- Those residing in rural areas

For the above identified underserved/unserved populations, mental health services was the service category that service providers and staff were most likely to report as inadequate. The most common service need identified for these underserved populations was transportation, along with increased outreach and training for specific populations. Similar to needs identified for individuals with a most significant disability and minority groups, DVR staff identified transportation, job coaches, and supported employment providers as those that needed to improve services to underserved populations.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND.

There is good coordination between DVR and other partners in the statewide workforce system when it comes to serving individuals with disabilities. Both DVR consumers and non-consumers reported coordination between WIOA system providers working very or somewhat well (75.6% of DVR consumers and 74.3% of non- consumers). Those who are not currently working with DVR reported using community- based resources like community rehabilitation programs, mental health centers, and local staffing agencies.

One important difference between consumers and non-consumers was the reported prevalence of discrimination. About two-thirds (65.9%) of respondents who were not DVR consumers reported experiencing discrimination related to their disability, though this sample was small. Only one-in-five (19.9%) of individuals working with DVR reported experiencing this barrier.

In qualitative research data, individuals from other parts of the workforce investment system like the Wisconsin Job Centers and Centers for Independent Living reported strong relationships with DVR and their staff. These providers echoed concerns about unmet mental health needs expressed by groups working with unhoused populations.

Likewise, businesses who had worked with DVR reported good relationships, with 87.8% of those who worked with DVR willing to recommend it. Likewise, those who had not worked with DVR expressed interest in DVR services for employers, and learning more about how to make their businesses more welcoming and capable of employing individuals with disabilities. Considering that these were businesses who were largely working with other aspects of Wisconsin's workforce development system, there is obviously an appetite for more services and job opportunities for those with disabilities.

When it works well, the different systems do a good job of blending and braiding services and funds to ensure that consumers have a seamless stream of services to meet their needs. Post-pandemic circumstances such as remote work and meeting with individuals in the community find that DVR and workforce center staff work to coordinate in person meetings with one another and mutual consumers and also leverage the use of virtual meetings.

DVR, especially DVR Business Service Team, has shown more interest and activity in collaborating with the workforce centers and has been less siloed since the pandemic. For example, DVR has begun inviting workforce center staff to DVR orientations for new staff. According to workforce center staff, DVR has shown considerable interest in collaboration with the local workforce center partners. This collaboration has high potential for meeting consumer needs that cannot be met by DVR but might be met by a workforce center partner. This improved collaboration by all partners improves planning and service coordination to better meet consumer needs.

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 most recent Comprehensive Statewide Needs Assessment completed in 2024 evaluated the needs of individuals with disabilities for transition services and Pre- Employment Transition Services (Pre-ETS), and the extent to which such services provided under the Rehabilitation Act as amended by WIOA are coordinated under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) in order to meet the needs of individuals with disabilities. Federal regulations require that DVR reserve 15% of their funds to provide students with disabilities ages 14-21 with Pre-

Employment Transition Services (Pre-ETS). DVR is spending at least 15% on the Pre-ETS required services.

As WIOA promotes cross-agency collaboration for DVR to serve youth and students with disabilities, the assessment of services must include a qualitative assessment of coordination. Many youths receive services from schools, Centers for Independent Living (CILs), DVR, or other community providers. As such, there is no singular, all-inclusive count of those who are currently receiving Pre-ETS (besides those served by DVR), which makes it difficult to accurately pinpoint how many are underserved or unserved. Many of the unserved / underserved population are most likely receiving services from providers that are easier for the student to access and fit the student's schedule. And some of the unserved/underserved students may have chosen not to participate in Pre-ETS.

When surveyed about the adequacy of Pre-ETS services, many staff indicated that the majority of Pre-ETS service types were not always adequate. However, staff did not flag 'Individuals transitioning from high school to work' as an underserved group within the same survey. And although the majority of service provider staff who work with students transitioning from education to the workforce noted that the adequacy of Pre-ETS services sometimes fell short, service providers were still more likely to rate Pre-ETS services highly compared to other service types. Individual consumers working with DVR most frequently reported receiving Pre-ETS services they required, even if some reported needing more services in a given area. Less than a third reported not receiving any given Pre-ETS service they determined they needed.

In DVR's January 2024 independent survey of school-based transition coordinators, reviewed as part of this effort, respondents often reported that students and families are not interested in working with DVR until they're preparing to leave educational environments. This generally means until they're in their junior or senior year of high school, or later for individuals pursuing post-secondary education. Working to make students more aware of DVR services that help individuals prepare for work, which cover investigation and costs of accommodations, training, and education could better help serve this population.

In the area of post-secondary education, all stakeholders providing feedback mentioned the importance of constant and regular communication between DVR, post-secondary disability service staff, high school staff, and families about the consumer's expectations and readiness for college. Both DVR and post-secondary disability service staff stressed the importance of explaining to prospective college students the dramatic differences between their experiences in high school and the expectations in college. The level of wraparound services does not follow the student from high school to college, and a student with disabilities needs good self- advocacy skills, a clear educational goal, and a support network to increase their chances of a successful post-secondary experience

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

Wisconsin DVR's 2024 Comprehensive Statewide Needs Assessment must include an assessment of the need to establish, develop, or improve community rehabilitation programs in Wisconsin. Exploration should be given to new and innovative methods to provide services when service providers either cannot fill positions or staff leave after a short time on the job. From a service provider perspective there is a need to balance the economics of service provider sustainability with providing service in unserved/underserved areas with low consumer numbers and/or low service demand. If there are insufficient billable hours, the service provider loses money if they station a staff member in an area, or only periodically send a staff member to the area.

Provider staffing levels are below optimal:

- Turnover and shortages of service provider staff causes difficulties in all aspects of the DVR process, from application to case closure.
- For more than five years, DVR has identified a decrease in the capacity of service providers who have a DVR service agreement to deliver authorized services in a timely manner. This has caused delays in consumer progress and in some cases provider waitlists. It may also hamper DVR's efforts to reduce service provider wait list counts by 20% by June 30, 2028, as indicated in Wisconsin's 2024-2027 WIOA State Plan.
- DVR and service provider staff alike noted a shortage of service providers in specialties and in rural areas. For example, as the number of consumers with serious mental health needs increases, the availability of mental health services, psychiatrists, and psychologists, remains flat or is even declining in certain areas. As DVR caseloads become increasingly populated with consumers who have serious mental health conditions, DVR counselors feel less prepared to work with these consumers. Most DVR and service provider staff were not trained to work with—or provide direct services to—consumers with serious mental health issues, hence both DVR and service provider staff were least likely to report mental health services as 'always adequate.'

As such, DVR and service providers could consider other approaches to meet the needs while making the methods more economically feasible for a service provider. Approaches to consider:

- Identify current services that can be provided remotely, identify consumers who are comfortable with remote/virtual services and then encourage service providers to hire staff who only provide virtual/remote services. DVR can encourage providers to consider recruiting both from Wisconsin and outside Wisconsin.
- To complement virtual/remote services, develop services and trainings that can be delivered on any platform (desktop, laptop, tablet, cell phone) regardless of type of service connection (Wi-Fi, internet, cell phone plan).
- Assign current DVR staff or hire additional staff dedicated to recruiting and increasing the number of service providers and potentially increasing the number of employers willing to hire DVR consumers.
- Encourage service provision in underserved/unserved areas and improve statewide coverage, with special rates or add-on rates if a provider is willing to serve a consumer in a

specific area of need. Ohio VR has two add-on rates – Critical Need Rate (CNR) and Extra Travel Allowance (ETA). A counselor can authorize a CNR (in addition to the regular service rate) for a provider to serve a consumer in an area without a service provider for that service. The ETA can be added at the discretion of the counselor for serving clients in an area without a service provider.

- If a current provider shows interest in adding a service to its offerings and it is appropriate, follow past experiences and consider providing an enhanced rate or an add-on rate to the current rate to support start-up costs, staff training and staff recruitment. The enhanced rate would be time limited and based on criteria jointly established by DVR and the provider.
- To increase the number of trained Supported Employment and Customized Employment providers, consider determining necessary competencies to provide Supported Employment and Customized Employment and identify/develop less expensive and locally developed alternatives to current credentials.
- The availability of remote work options creates another competitive integrated employment opportunity for consumers. It could also be a great option for consumers who have limited or no access to transportation. To prepare for remote work, some consumers may need training on the skills and differences of remote work, e.g., participating in virtual meetings, working from home, basic troubleshooting skills with computer issues.
- Because the low volume of consumers with self-employment job goals can make it difficult for a DVR staff person to stay current with business development and business plans, consider partnerships with the local SCORE chapter, retired businesspeople, or an active business to mentor consumers interested in self-employment.
- Using models like Implementation Science and Everett Rogers' Diffusion of Innovation to help service providers.
- Supporting individuals with significant mental health needs is frequently reported as a need in Wisconsin. Incentivizing service provider staff training around mental health supports, and methods of accessing mental health treatment, could significantly improve the capacity of the workforce investment system to work with individuals with mental health diagnoses.
- Examination of case closure and spending patterns revealed difficulty keeping Black or African American individuals engaged in services, communicating with them, and completing milestones necessary for payment. Encouraging service providers to add cultural competency training to staff training requirements could mitigate some of these issues and improve outcomes.
- While there were no quantitative findings of differences in rural areas, these populations were a concern for DVR staff, providers, and other stakeholders as seen in our qualitative research. Transportation needs and limited job market opportunities were common concerns. Expanding access to broadband internet connections and providing training in remote work skills could present a meaningful alternative to this long-challenging population.

By investing in the growth of service providers and service options, DVR not only expands consumers' choice of provider(s) but also invests in successful services demonstrated to yield results and a higher successful case closure rate.

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 October 2025 to present and obtain feedback on at a WRC Combined committee meeting and a full council meeting in November 2025. This feedback was incorporated into the state plan goals and strategies and approved by the WRC full council on November 20, 2025.

The goals that DVR developed were based on the most recent CSNA (2024), performance accountability measurements, WRC feedback and recommendations, agency staff survey information, agency staffing data, Competitive Integrated Employment (CIE) 2025 Report and 2026-2027 Plan, Governors Council on Workforce Investment Strategic Plan 2022-2026, as well as other DVR data and efforts.

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, POST-SECONDARY 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.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

DVR developed 6 goals based on our most recent Comprehensive Statewide Needs Assessment (2024), performance accountability measurements, WRC feedback and recommendations, agency staff survey information, agency staffing data, Competitive Integrated Employment (CIE) 2025 Report and 2026-2027 Plan, and Governors Council on Workforce Investment, as well as other DVR data and efforts. 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 practices and expansion activities when possible.

1. Business Services:

DVR's Business Services section will 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 measures, WRC recommendations, Governors Council on Workforce Investment Strategic Plan)

- 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, state workforce system, and community partners to ensure access to a full scope of resources and services.
- e. 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.

f. Analyze data collected on employment with the same employer after exit to inform practices that increase this measure and to inform employer outreach and business services.

2. Increase consumer hourly wages:

Achieve a 5% 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 of July 1, 2026 through June 30, 2028).

(Basis: 2024 CSNA, performance accountability measures, and WRC recommendation)

- a. Increase the number of consumers pursuing a credential . This recommendation includes consumers in supported and customized employment.
- b. Increase Work Incentive Benefits services provided to consumers receiving SSI/SSDI to assist in understanding the use of Work Incentives, Trial Work Periods, and Ticket to Work when pursuing employment.
- c. Use of LMI data by staff and consumers to identify high quality jobs and training needs during the IPE development process including 50 hot jobs and in-demand occupations.
- d. DVR Business Services Consultants sharing local labor market information and "hot" job lead information with other staff and consumers.
- e. Continue to explore and identify potential career pathways, including apprenticeships and registered apprenticeships with consumers when identifying their employment goals.

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 measures, WRC recommendation, 2024 CSNA, CIE Report and Plan)

- a. 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. Provide information regarding DVR services at high school in-service/teacher trainings, parent teacher conference, statewide conferences and County Communities on Transition (CCoT) meetings. Also, outreach will be provided to post-secondary organizations to encourage referral to DVR.
- c. Work with eligible students and their teams to coordinate transition services, braid funding between DVR and local schools, explore career options, provide Pre-ETS and other necessary services, and support them towards achieving their employment goals.
- d. Review and revise informational materials for transition aged youth in coordination with DVR Rebranding efforts.
- e. Through the Statewide Transition Action and Resource Team (START) review DVR policy about secondary and post-secondary services to reduce any barriers in serving students with disabilities.

4. Staff Engagement:

Increase DVR staff engagement by showing improvement on current DWD Employee Engagement survey results 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 surveys, recruitment, and retention data)

- 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 DWD Stay Interviews every three years 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 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 strategies that focus on building safe and supportive workspaces for staff.
- h. Support DVR staff advancement through caseload specialization across disability and unserved/underserved populations as appropriate.

5. Service Provider Capacity Building and Collaboration:

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. The reasons for provider waitlists include: high turnover, 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, and an increase in consumers with multiple disability and non-disability barriers to employment. Complicating capacity issues is the programmatic complexity within the vocational rehabilitation system and the need for increased and consistent collaboration between service providers and DVR.

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 and increase opportunities for collaboration, communication, and understanding between DVR and their Service Providers in order to improve employment outcomes for consumers. (June 30, 2028)

The measurement is made using the DVR dashboard report comparing consumer waiting list numbers tracked and averaged on a quarterly basis as well as providing and tracking opportunities for communication and collaboration between DVR and service providers

(Basis: 2024 CNSA, WRC recommendation, performance accountability measures, service provider waiting list data)

Strategies to improve capacity:

- a. Implementation of qualification standards that meet the Association of Community Rehabilitation Education (ACRE) standards and other industry recognized standards for providers delivering employment services such as job development and systematic instruction.
- b. Streamline reporting requirements and decrease administrative burdens when appropriate
- c. Encourage the expansions of virtual/hybrid services.
- d. Collaborate with existing service providers to determine if they can offer under-provided services.
- e. Bi-annually survey service providers to gain information regarding rate setting, payment structure, reporting, service provision and capacity.
- f. Regular discussions with Wisconsin Department of Health Services, Managed Care Organizations, IRIS (Include, Respect, I Self-Direct) Consulting Agencies (ICAs), and service

providers regarding funding instability when transitioning from one funding source to another and service provider capacity in supported employment

Strategies for increased communication and collaboration:

- a. Improve DVR and service provider understanding of each other's operations and create increased opportunities for communication by holding regular local and statewide joint meetings, providing webinars on operational topics and other avenues for increasing communication.
- b. Continue with the Service Provider Advisory Committee and meet with providers to gather input on technical specification implementation, operational feedback and innovative brainstorming.
- c. Provide training to DVR staff and providers on service technical specifications for improved consistency with interpretation, application and efficient delivery of services to consumers.

6. Unserved and Underserved Communities:

Section 101(a)(15) of the Rehabilitation Act

34 CFR 361.29(a)(1)(i)(B)

DVR will focus on increasing the current percentage of unserved and underserved groups who have an IPE and reach successful closure.

(Basis: 2024 CSNA, CIE Report and Plan).

- a. DVR will analyze our data each program year by the following categories: new applicants, new eligibilities, new IPE's, education and training services, pre-employment transition services and successful employment outcomes. Additional data reports and analysis will be developed to focus on the consumer experience e.g. wage data by demographics, service provider data by demographics, and service provision and spending pattern trends and discrepancies across consumers. This analysis may inform future policies and best practices to increase the successful participation of unserved and underserved groups.
- b. Develop a training series and resources to better serve unserved and underserved communities for staff which will include a focus on mental health.
- c. Suggest training and information resources to our service providers to increase knowledge of working with unserved and underserved populations.
- d. Creation of local level plans focusing on outreach to unserved and underserved groups and development of community partnerships and resources to address barriers with a specific focus on housing and transportation resources
- e. Align DVR staffing complement to reflect the individuals DVR serves through a review of hiring practices and using tools such as added pay for bilingual staff.
- f. Implement a correctional institution approach and develop VR resources to increase outcomes for justice-involved consumers.
- g. Examine and evaluate efficiencies in sharing disability documentation between DVR and Tribal VR eligibility determinations to strengthen partnerships between DVR and Tribal VR.

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;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

In Wisconsin DVR's PY24 State Plan, DVR identified 6 goals with strategies that focus on increasing the quality employment outcome for individuals with disabilities, including those in supported employment. Progress on each goal is described below with the most recently completed program year information.

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.

RESULTS:

DVR Business services staff continue to work with business to identify employment opportunities that meet competitive integrated employment standards. Those opportunities are then shared internally with DVR staff working with consumers as well as externally with the WI DVR service provider network. DVR Business Services staff regularly connect with business and discuss the opportunity to recruit from our extensive talent pool of jobseekers. As Business Service staff meet with businesses, when appropriate, they engage in conversations around opportunities to engage with youth with disabilities to help them better understand and explore the industry, position, and specific company details to help companies develop a talent pipeline in their community. Business Services staff stay up to date on various career pathways and strive to make connections between businesses that are seeking employees and DVR consumers interested in advancing in their career through sharing a variety of job leads and information about the employers.

The Business Services team is actively engaged with business to facilitate their learning of various disability topics such as increasing disability awareness, creating inclusive work cultures, and adopting strategies to hire and retain disability talent. From July of 2024-October of 2025 the DVR Business Services team has conducted 64 presentations and estimate that important information on these topics has been shared with over 1,000 individuals in this time frame. DVR Business Services staff work to coordinate with local Business Services teams comprised of other WIOA partners to ensure that businesses are being made aware of and getting connected to all the services available.

The DVR Business Services team recently engaged in training on the Partners in Business program to develop a better understanding of what options are available to businesses that are employing those with on-the-job support needs. Additionally, the team has reviewed the Disability:IN Wisconsin Guide to Creating Internal Supports in the Workplace which shares great insight into employment for those with the most significant disabilities. The business services team has access to the DVR Sync sessions that cover a wide-range of disability topics throughout the year and has plans to engage in various training through the Technical Assistance Center on Quality Employment to develop a better understanding of Supported and Customized Employment and individuals with the most significant disabilities.

Work has recently begun to understand the services that can be provided that have the most impact on retention with an employer. DVR Business Services are represented on a work group in WI comprised of WIOA partners and seeking to develop an understanding of the services that have the most impact for retention amongst other things. DVR believes employer education and providing up-to-date labor market information to DVR staff are two ways we can positively impact retention with the same employer. The Business Services team continues to provide employer education and now incorporates regular conversations with DVR case facilitators to discuss local

LMI, hot jobs industries, employment trends, and conduct tours or virtual meet and greets with employers.

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.

RESULTS:

In Program Year 2024, Wisconsin DVR increased wages 5% by using the strategies identified in this goal. Additionally, during Program Year 2024, there was a 9% increase in consumers pursuing a credential. DVR has made some progress in increasing the number of Work Incentive Benefits for consumers. Wisconsin DVR has experienced a drop in the number of individuals receiving SSI/SSDI applying for services which may make a 10% increase difficult. DVR has provided LMI and hot jobs resources to staff to use in assisting consumers identifying job goals to provide information on high quality jobs and training needs. In DVR staff meetings, the Business Services Consultants lead conversations on specific job sectors, highlighting labor market changes, highlighting employers and general question and answer sessions. DVR has continued to implement the Career Pathways Advancement Grant with over 1000 individuals enrolled and 239 have found already found competitive integrated employment.

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.

RESULTS:

DVR maintains a WI School Liaisons list that identifies a DVR staff liaison for each WI public high school. This document is updated as needed and available on DVR's website for the public to access. DVR continues to provide outreach to schools through trainings, in-service meetings, local job fairs, conferences, attending IEP meetings, etc. DVR will be providing a survey to schools during 2025-2026 school year to obtain feedback on outreach and coordination efforts and determine areas of continued improvement. DVR partners with the local schools and long-term care system to coordinate transition services for students, provide Pre-ETS services, and braid funding. DVR attended statewide collaboration meetings with a focus on transition and partnering between Department of Public Instruction, DVR staff, and school staff. DVR provides Pre-ETS services to students statewide and throughout the year, with many local areas capitalizing on the summer months for specialized programming . A large amount of DVR Pre-ET expenditures occurs during the summer months. DVR exceeded 15% Pre-ETS expenditures in FFY26.

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 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 Action Plan strategies that focus on building safe and supportive workspaces for staff.

RESULTS:

DVR continues to review our pay parameters and work within the state compensation plan. As allowable by the plan, we have adjusted starting pay parameters for positions eligible for this to align closer with labor market rates while also recognizing what the pay rates of current staff in these positions are at. Additionally, DVR has provided Discretionary Equity and Retention Awards and Discretionary Merit Compensation as allowable by the state compensation plan and budget availability. DVR continues to share job openings across the Division and where able, has been flexible with position location to allow for more staff to consider applying for these advancement opportunities. DVR also offers a training related to applying for state employment opportunities to help provide staff with the knowledge and resources when applying for advancement opportunities

DVR provides staff with many different training opportunities. Staff have access to on demand trainings through the agency training platform, and staff are also sent communications about the training opportunities that may be helpful to them. DVR offers enough training and assists with getting these trainings approved for certification and licensure credits for our counseling staff.

DVR staff participate in scheduled agency surveys related to engagement, training needs, and stay interviews. In 2024 stay interviews and the staff engagement survey were completed. In 2025 a staff development needs assessment was completed. The 2024 Stay Survey showed that staff enjoy remote/flexibility work, relationships with co-workers, and meaningful work. Some areas of focus were clearer communication/more feedback, professional development/training, better compensation, and more time/support/resources to assist with workload. On the 2024 Engagement survey, DVR staff participated at a high rate. Job Satisfaction ratings were all above 3.5

on a 5-point scale, ranging from 3.9-4.5 showing an engaged workforce. DVR staff scored higher than a 3.5 on all 7 measures of the RESPECT model. The RESPECT Model, created by Paul L. Marciano, is an actionable philosophy that identifies seven factors that cause employees to feel more respected and become more engaged in the workplace. The seven factors include: 1) Recognition, 2) Empowerment, 3) Support, 4) Partnering, 5) Expectations, 6) Consideration, and 7) Trust. The engagement survey also showed that efforts from our 2022 Needs Assessment have proven impactful with an increase of staff reporting that they are familiar with the process for reporting discrimination, bullying, and harassment. The information from these surveys is used to inform an DVR Employee Engagement plan, DVR has two staff on the agency-wide Employee Engagement Team who meet with DVR leadership regularly to inform efforts and provide feedback on the state of DVR employee engagement.

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

RESULTS:

DVR actively monitors service provider waitlists through its internal dashboard, which provides live daily updates, weekly detailed reports, and monthly trend analyses at both statewide and WDA levels. This ongoing monitoring has improved data accuracy and allowed DVR to correct internal and external errors of service providers when documenting their waitlist status. While data accuracy and monitoring have improved, the number of consumers on service provider waitlists has continued to trend upward, highlighting ongoing capacity challenges and the need for continued focus. Draft guidance for both staff and providers on waitlist management has been developed and is pending final approval. Plans are underway to establish a regular communication cadence via a statewide service provider newsletter distributed through GovDelivery.

DVR's Service Provider Qualification Requirements currently in review and set for possible implementation in the future have been designed to align with ACRE standards and national best practices. Efforts include identifying training resources, exploring partnerships to improve access and affordability, and promoting upward mobility for provider staff.

DVR maintains regular coordination with the Department of Health Services and other long-term care funding partners to address service transitions, and service rates undergo regular review to ensure they reflect provider needs. While DVR rates are sufficient to support high-quality service delivery, differences in funding and reimbursement structures across systems can create challenges in sustaining ongoing supports and may limit consumer choice at transition. DVR continues to work toward shared understanding, alignment, and statewide consistency, including through the technical specification review process, to help providers plan effectively, deliver services more reliably, and ultimately increase provider capacity while reducing consumer wait lists.

Unserved and Underserved Communities:

Section 101(a)(15) of the Rehabilitation Act

34 CFR 361.29(a)(1)(i)(B)

DVR will focus on increasing the current percentage of unserved and underserved 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 Action Plan beginning in March 2023 focused on equitable experiences and outcomes for consumers from unserved and underserved 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 Needs Assessment, 2023 Wisconsin CIE Plan Report).

- a. DVR will develop a 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 focus on unserved and underserved populations as well as provision of training resources 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 unserved and underserved groups, e.g., wage data by demographics, service provider data by demographics.
- e. Creation of local level Action Plans which will focus on consumer outreach targeting unserved and underserved 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.

RESULTS:

Since ending PY 2022, DVR has experienced some success in increasing engagement with unserved/underserved populations. DVR is required by federal law to collect demographic data on race and Hispanic or Non-Hispanic ethnicity. From PY 2022 through PY 2024 DVR saw an increase in the percentage of total new IPEs developed for Black/African American individuals (+7%) and individuals reporting Hispanic ethnicity (+1%). Other racial groups remained consistent from PY 2022 through June 6, 2024. The total number of individuals who received education and training services through DVR increased by xx from PY 2022 through PY2024 During that period, all racial and ethnic groups served by DVR saw an increase in the number of individuals receiving these services. The proportion of Black/African American individuals with IPEs who received DVR education and training services remained consistent between PY 2022 and PY 2024 at 18%, and self-identified Hispanic individuals saw an increase of 1%, from 8% to 9% over the same period. In PY 2024, individuals representing racial and ethnic minority groups made up 25% those receiving education and training services through DVR.

DVR formed a Customer Experience Taskforce (CET) to help focus on the experience of unserved and underserved consumer populations as well as our staff's experience. The CET has worked with Department of Administration's Training staff to investigate informative trainings that will support efforts to better serve under and unserved populations. DVR Leadership is engaging in training that support efforts around having difficult conversations as well as reviewing equitable hiring practices to create an inclusive environment for all staff and consumers.

DVR uses a Request for Proposal process for new DVR service providers. The application process has asked potential providers to speak to their experience and skills in serving unserved and underserved populations. We will be asking all current providers to speak to this as well. This information will be added to the provider information section for use when consumers are working with their DVR counselor or specialist to select a provider.

Over the last two years, all DVR managers worked with staff to review the demographic data for their respective workforce development areas and developed 1-2 areas of focus related to unserved/underserved populations. This work will be reevaluated with use of new Comprehensive Statewide Needs Assessment information over the next 2 program years.

DVR will continue to review our data dashboards to add meaningful data for review our work with and results for unserved and underserved populations..

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

WI DVR did not meet our Median Earnings and 2nd and 4th Quarter after Exit negotiated levels of performance. These were not met due to a number of factors:

- WI DVR serves a high number of supported employment cases. In PY24, Supported Employment cases accounted for 18.9% of all successful closures. The median weekly wage per week for supported employment cases was \$156/week vs. Non-supported Employment Cases had median weekly earnings of \$384/week.
- Wisconsin's minimum wage remains \$7.25 per hour
- DVR closed an increased number of unsuccessful cases in PY24, as there were a number of cases who have not reengaged since the pandemic. This resulted in 1,085 more unsuccessful closures in PY24, compared to PY23.

Measure	PY24 Negotiated Level of Performance	Actual Performance
Measurable Skills Gain (MSG)	61.5%	67.6%
Credential Attainment	41%	41.7%
Median Earnings	\$3,537	\$3,435
Quarter 2 Post Exit	57.1%	55.9%
Quarter 4 Post Exit	54.9%	51.7%

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). This funding helps the ILCW to create the State Plan for Independent Living.

WI DVR fully funds the operations and activities of the SRC (WRC) as needed annually including covering travel and per diem costs for WRC identified members to attend state and national meetings.

WI DVR will fund but does not specifically reserve innovation and expansion projects in Wisconsin. WI DVR has and will continue to initiate projects and pilots to expand and improve vocational rehabilitation services..

**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) VR agency requests to receive title VI funds.

**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.**

Title VI Part A and B funds are specifically intended to support the provision of supported employment services for youth and adults with the most significant disabilities. Wisconsin DVR provides the required non-Federal share of 10% for the Title VI-B funds. The funds are used to provide individualized supported employment services, including Customized Employment and Individual Placement and Supports, to assist consumers to find and maintain competitive integrated employment. The Title VI funds are used to support ongoing job supports once an individual with the most significant disability has obtained employment. Wisconsin DVR fully expends Title VI funds and expends Title I funds for supported employment service as well. Wisconsin DVR understands that Title VI funds are used for supported employment services after job placement.

As described in Goals and Priorities section of this plan, DVR is prioritizing the need to increase the quantity of DVR service providers providing quality supported employment services. Additionally, DVR will focus on increasing the average hourly wage and hours worked per week for consumers in supported employment.

**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 I funds and Title VI funds to deliver supported employment services in Wisconsin.

Extent and Scope of Services:

WI DVR provides an array of services for individuals with the most significant disabilities requiring supported employment. Key components include assessment, job development, on-the-job supports or systematic instruction, and transition to long-term supports. DVR may provide up to 24 months of ongoing support services to both youth and adults with the most significant disabilities. Individuals in supported employment are provided ongoing support services until they are deemed stable in employment, when they are transitioned to long-term supports. For youth who do not have an identified source of long-term support available, DVR can provide long-term support (extended services) funding for a period up to 48 months or to the consumer's 25th birthday, whichever comes first. In Wisconsin, long-term supports are provided by Medicaid funded managed care organizations, IRIS Consulting Agencies (ICAs), county mental health agencies, and other state programs.

Quality of Services:

Supported employment services with WI DVR demonstrate positive outcomes through strong partnerships, increased wages, and individualized career pathways. Through individualized services and a strong collaboration with employers, DVR successfully connects individuals with disabilities with jobs that align with their unique strengths, abilities, and interests. DVR's strategic collaborations, including a partnership with the Department of Health Services on the Individual Placement and Supports (IPS) model, shows a commitment to improve practices that can improve services for consumers with serious mental health and substance use disorders. Program initiatives, like the Career Pathways Advancement program, has created opportunities for consumers in high demand fields leading to increased wages. Finally, DVR, Department of Public Instruction (DPI), and Department of Health Services (DHS) work collaboratively on the 2017 Wisconsin Act 178 legislation and resulting requirements and activities surrounding quality competitive integrated employment outcomes for people with disabilities.

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 IN ORDER 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 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

WI DVR has service agreements with DVR Service Providers to deliver supported employment services directly to DVR consumers with the most significant disabilities. DVR has technical specifications for all supported employment services that outline the expectations and deliverables and service fees paid are outcome based. Additionally, WI DVR has formal agreements with the

state Medicaid services and mental health divisions, and the Department of Public Instruction, to facilitate cooperative service delivery and transition to long term (extended) supports once a job is stabilized in supported employment. WI DVR provides ongoing support services up to 24 months prior to transition to a long-term support agency. For a youth with the most significant disability, the initial support period can be up to 24 months, with the possibility of ongoing, extended support available for up to 48 months or until the youth turns 25 if there are no other means of extended support. This collaborative framework, which includes coordinated service plans among all members of the supported employment team, is vital for achieving competitive integrated employment and ensuring individuals with the most significant disabilities have the necessary supports to maintain their jobs.

Wisconsin DVR along with the Department of Public Instruction (DPI), and Department of Health Services (DHS) collaborate on a 2-year Competitive Integrated Employment (CIE) Plan per the 2017 Wisconsin Act 178. The SFY 2026-27 plan includes the following activities that are related to Supported Employment Services in Wisconsin.

- Develop and implement a strategic plan to broaden access to Individual Placement and Supports (IPS) including implementing new IPS sites in each year of the joint plan.
- Research options for service provider training and credentials.
- Analyze costs for service providers to deliver supported employment services to individuals served by DVR and DHS to inform future fee schedule considerations.
- Identify and conduct outreach to other provider industries (e.g., direct care, mental health, youth justice, unhoused, etc.) to gauge interest in providing employment services to CIE target groups.
- Encourage current employment service providers to expand their service areas through targeted outreach.
- Research expansion of the Dane County Supported Employment Provider Coalition model to increase collaboration between partners who support individuals in CIE.
- A document detailing sources of information for individuals with disabilities being serviced by the supported employment system and how this information can be shared among partner agencies for efficiencies and improvements with service delivery has been drafted and will be posted to the DVR and CIE website as soon as it receives approval from the communication offices of the respective agencies.
- Educate employers, families, advocacy and self-advocacy organizations, schools, Managed Care Organizations (MCOs), IRIS (Include, Respect, I Self-Direct) Consulting Agencies (ICAs), and Aging and Disability Recourse Center (ADRC) staff that CIE is possible with collaboration and relationship building.

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

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Federal Fiscal Year 2026 Estimates

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Category 1	18,571	9120	\$29,997,440	9451
Category 2	13,339	6880	\$16,842,240	6459
Category 3	104	0	\$0	104
Total	32,014	16,000	\$46,893,680	16,014

The Wisconsin Division of Vocational Rehabilitation (WI DVR) has identified that it will not have enough financial resources available to serve all consumers through FFY26. There are two reasons for this, the increase in expenditures due to serving more consumers along with the increased costs of services. We anticipate a non-federal share shortfall of at least \$1.9 million in the third quarter of FFY26. In addition, in the potential absence of Federal reallocation funding, which totaled approximately \$5.5 million in FFY25, DVR may have insufficient Federal resources to serve all eligible individuals in FFY26. These estimates are based upon an analysis of the projected number of consumers to be served, anticipated costs by priority categories, and required administrative costs. Due to this we need to close all categories at this time.

The estimates in the table above assume all categories are closed and only those consumers with signed IPEs will continue to receive services. The estimated costs per Priority Category was determined using the average cost per case by category type using our current fiscal data.

In addition to eligible consumers with an approved IPE receiving services, we anticipate continued spending on Pre-ETS services and costs associated with determining consumer eligible for services.

Once our spending is within budget, and projections identify available funds to serve additional consumers, we will activate cases for services beginning with all of Category 1. WI DVR has

implemented cost containment measures such as fee schedules for consumer services, limited out of state travel and in state travel, assessing leases and office space needs, and reviewing vacancies to determine if they should be filled. We continue to explore other strategies and are reaching out to other state VR programs to learn what strategies they have implemented.

B. SUPPORTED EMPLOYMENT PROGRAM.

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Federal Fiscal Year 2026 Estimates

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Category 1	4500	3000	\$15,354,000	1500

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

1. 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.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is implementing an order of selection with one or more priority categories closed.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

Annual state and federal resources allocated for WI DVR are not sufficient to serve all eligible individuals. There have been significant increases in the number of individuals seeking DVR services over the past several years, increases in the cost for services and administrative cost. The projections for FFY26 estimate a shortage in state and federal spending authority requiring the implementation of an order of selection for all priority categories. This is based upon an analysis of operations, expenditures, anticipated costs by priority categories, and required administrative costs.

WI DVR had Priority Category 3 closed in PY24 and has paused activations for this category. In PY25 WI DVR will be closing all Priority Categories (Categories 1,2, and 3) to address the insufficient resources to serve all eligible individuals.

WI DVR's Order of Selection policy ensures that eligible individuals with the most significant disabilities will receive priority for services. WI DVR's plan would be to move out of an order of selection once there are sufficient state and federal funds available.

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

At any time that DVR resources are not sufficient to serve all eligible consumers, an order of selection for services shall be implemented. Highest priority (category 1) shall be given to consumers with the most significant disabilities. Second priority (category 2) shall be given to consumers with significant disabilities, and third priority (category 3) to all other eligible individuals. Eligible consumers will be served as resources allow.

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 to 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: An allowed SSDI beneficiary or SSI recipient is presumed to be, at least, an individual with a significant disability.

Category 3: Other eligible consumers include those who do not have a disability that seriously limits one or more functional capacities and do not require multiple services over an extended period. Also included in this category are all consumers who do not require multiple services over an extended period of time.

After a consumer is found eligible for VR services, category determination is completed. An assessment of existing and/or additional data, to the extent needed to make this determination, may be conducted. The VR Counselor, jointly with each consumer, shall evaluate the consumer's functional limitations and anticipated scope of services in the OOS determination. This policy does not affect consumers who have already begun receiving services under an approved plan for employment prior to the implementation date of the OOS.

Each consumer must be notified in writing, supplemented as necessary by other appropriate modes of communication consistent with the informed choice of the individual, of the OOS determination. Consumers in a closed category are offered referral services and the option to be placed on a waiting list until the consumer is activated for VR services. Each consumer in a closed category will be contacted annually to determine if additional information is available. Consumers are taken off the waiting list based on their category and date of application.

A student may continue to receive Pre-ETS services while in a closed OOS category if they have been receiving Pre-ETS services from DVR prior to eligibility determination. This includes a Potentially Eligible (PE) student and student applicants.

Employment retention services while in OOS allows eligible individuals who require specific services or equipment to maintain employment, the opportunity to forgo the waitlist for retention services to help them maintain their job.

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.

Per WI DVR policy, consumers in a closed category are offered referral services and the option to be placed on a waiting list until the consumer is activated for VR services. Each consumer in a closed category will be contacted annually to determine if additional information is available. Consumers are taken off the waiting list based on their category and date of application.

Opening categories is dependent on several budget factors, including any increases in state funds, future federal awards, costs for consumer services, and attrition of open cases with an IPE in place. WI DVR will be closely monitoring its budget and consumer information monthly using real-time dashboard reports to determine when consumers can be activated from the waitlist starting with individuals with the most significant disabilities.

Once all eligible individuals on the waiting list in Category 1 are served and Category 1 is fully opened, then WI DVR will begin serving eligible individuals on waiting list in Category 2 by application date. Once Category 2 is fully open and no individuals are on the waiting list, then WI DVR will begin serving all eligible individuals on waiting list in Category 3 by application date. Once

Category 3 is fully opened there will no longer be an order, and all eligible individuals will be served.

It is not anticipated that Category 1 would be opened in PY26. We anticipate being able to activate Category 1 cases from the waitlist during PY27 with the goal of opening Category 1 by the end of PY27. This is dependent on several factors, including the number of consumers being served, expenditures, state and federal funding levels received.

Under current projections, we anticipate being able to activate Category 1 cases from the waitlist during PY26 with the goal of opening Category 1 in PY27. This is dependent on a number of factors, including the number of consumers being served, expenditures, state and federal funding levels received.

3. 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.

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (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 Rehabilitation 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 OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE 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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Vocational Rehabilitation Counselor	157	163	132
Vocational Rehabilitation Specialist	60	62	100
Office Operations Associate	1	1	0
Consumer Case Coordinator	1	1	0
Financial Specialist - Senior	37	37	40
Field Managers/Supervisors	25	25	25
Business Services Consultants	12	12	12
Central Office Senior Leaders	8	8	8
Central Office Support Staff	26	26	26
Total	327	336	340

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 87 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. The current ratio for employed Vocational Rehabilitation Counselors and Vocational Rehabilitation Specialists to clients is approximately 1:82.

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.

Data in table was collected October 24, 2025..

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

Our average ratio of Vocational Rehabilitation Counselors and Vocational Rehabilitation Specialist is 1:84. With our projected number of individuals to be served in 5 years and personnel needed in 5 years we anticipate this ratio to remain the same.

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

In PY23 we served 30,374 individuals, and in PY24 we served 33,445. So far in PY25 we have served 24,433 individuals. We anticipate case numbers to continue to increase. We anticipate serving approximately 35,321 in 5 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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

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Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of Wisconsin-Stout	M.S Vocational Rehabilitation Counseling-On Line, only	48*	11

University of Wisconsin-Madison	M.S Degree in Clinical Rehabilitation Counseling	41	18
Marquette University	Master's in Clinical Rehabilitation Counseling	7	8
Mount Mary University	Clinical Rehabilitation Counseling	17	29

* Majority of students already have employment in various DSUs.

Data as of October 2025

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. Some 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 with their Licensed Professional Counselor- In Training credentials and works 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. DWD/DVR utilizes social media advertisements (wisc.jobs various social media accounts, LinkedIn, Indeed, Handshake). 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)
- Subgroup Committees from Council on State Administrators of Vocational Rehabilitation (CSAVR)
- 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 may award 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. The Training Officer also routinely helps individual staff persons find trainings based on specific professional needs. 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's Training Officer has also created a new employee checklist to help guide their learning during the first several months of employment. Additionally, on demand training curriculums, e.g. Eligibility Determination, IPE Development, etc. have been and will continue to be developed as a way to ensure new staff have the training information needed on day one.

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, 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 Mentor Challenge Experience Program. As budget allows, DVR will 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 as budget allows.

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 topics such as Respectful Workplace, 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 achronological 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 Local Education Agencies (LEAs) 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 LEAs. 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.

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 public school district in the state 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, Aging and Disability Resource Centers, WI Department of Correction – Division of Juvenile Corrections, TMG Wisconsin, Milwaukee Public Schools, 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, 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 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;

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;

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;

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;

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

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.

DVR has an Interagency Agreement that defines necessary relationships, policies and procedures between the DVR and the Department of Public Instruction (DPI) and was created to clarify roles and help ensure both agencies meet all related federal standards under the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA). Such requirements serve to outline a collaborative process that facilitates the transition of students with disabilities from school to competitive integrated employment.

The agreement between DVR and DPI is also consistent with the interagency agreement between DVR, DPI, and Department of Health Services (DHS), as well as the information in the Transition Action Guide (TAG) which put the agreement between DVR, DPI, and DHS into practice and describes the expectations students with disabilities and their families can have of the service systems overseen by each of the three state agencies when providing transition services.

Above mentioned interagency agreements and the TAG were updated in 2020.

WI DPI and DVR will provide consultation and technical assistance to assist Local Education Agencies (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.

WI DPI and DVR will work with 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. The [Transition Action Guide](#) (TAG) is tool and resource for LEA's and DVR staff to use to inform the transition process.

The roles and responsibilities and financial responsibilities, and a conflict resolution process for each agency are detailed in the above-mentioned interagency agreements between DVR, DPI and DHS as well as the Transition Action Guide (TAG).

[The Interagency agreement between DVR and the 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, Self-Determination Conference, 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 Conference and Employment First Conference.

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 the LEA and DVR personnel with permission of the student and, if applicable, the student's parent or guardian.

Included in the interagency agreement between DVR and DPI under the Statewide State Education Agency (SEA) Commitments section 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.

For any individual who is currently or may be placed in subminimum wage employment WI DVR has a contract with the University of Wisconsin Milwaukee (UWM) to meet with each subminimum wage worker in Wisconsin according to federal requirements. They work with 14 c employers to set-up meetings with workers and legal guardians. The meetings can take place at the subminimum wage job location, virtually, on the phone, or a location in the community. Career counseling and information and referral services about competitive integrated employment opportunities including how to access DVR services are provided The worker signs a certificate of participation and receives a copy.

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 WIOA core and partner workforce and community entities such as Veteran's Employment Services, adult, youth, and dislocated worker programs, job center staff, local Workforce Development Boards, technical colleges, and corrections representatives.

Business Services Teams collaborate to serve area business in a seamless and comprehensive manner. Local Workforce Development Board activities for both employers and job seekers are shared across the workforce system including to DVR BSC staff.

BSC staff have been integral members of local transition groups called County Communities on Transition (CCoTs), Project SEARCH Business Advisory councils, Youth Apprenticeship consortiums/steering committees which are geared towards developing employment opportunities and resources for students and youth with disabilities. DVR local area staff, BSCs and DVR service providers and employers can work collaboratively to develop work opportunities for both students and youth with disabilities, e.g summer youth work experience training programs, development of job shadowing programs, etc.

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.

As BSC engage with the business community, leads these employers may have are circulated to DVR staff and DVR service providers who then determine if there are any individuals fit the needs of the job opening. DVR's staff may also refer individuals with disabilities to our job development service providers. The DVR service providers then reach out to employers to help develop job opportunities for individual DVR consumers.

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 AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) 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 (DHS) which provides coordination and support for the Assistive Technology Council. DVR is active in the administration of the Assistive Technology State Plan. DVR is a member of the State Assistive Technology (AT) Advisory Council. The role of the council is "to provide consumer-responsive, consumer-driven advice to the State for planning, implementation, and evaluation of the activities carried out through the grant, including setting the measurable goals."

Wisconsin's AT Advisory Council provides advice and guidance on the following:

- Wisconsin's State Plan for Assistive Technology;
- WisTech loan program support and evaluation;
- Monitoring of program data and outcomes; and
- Developing and maintaining AT partnerships.

In addition, DVR has an Assistive Technology Statewide Team (AsTec) that provides a resource to DVR staff when providing assistive technology. DHS provides technical assistance to this team as needed.

The AsTec Team exists primarily as a group of subject matter expert DVR staff to assist DVR by examining policy, making recommendations, completing case consultations and DVR staff training. It is expected that members will act as a two-way conduit for their WDA, as well as identify best practices and to inform policy changes and to create tools for DVR staff to more effectively serve DVR consumers in need of Assistive Technology.

The mission of the AsTec Team is to promote, educate and support the use of Assistive Technology throughout the DVR process. This includes assisting the Division in providing analysis and recommendations related to quality service provision and adherence to state and federal policy.

The AsTec Team meets every two months to carry out the following activities and outcomes:

- Examine current guidance for updates and provide recommendations for changes.
- Assist in DVR staff training on updated guidance and Technical Spec in each WDA or Statewide, as directed by SLT.
- Provide targeted consultation to specialized populations (transition students and Youth) as needed to assist with federal legislation.
- Provide subject matter expert case consultation with other DVR staff to assist in providing resources, problem solving strategies, information and referral, and best practice suggestions.
- Collaborate with the SenseAbility team to ensure no duplicate of efforts and team with them on appropriate projects/trainings.
- Serve as subject matter experts and as a resource for Business Services staff to aid with Employer Services as needed.
- Maintain a statewide AT provider list.
- Maintain communication with service providers regarding updated products and changes in technology.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

In Wisconsin, the program identified to assist people with disabilities in farming is the Easterseals AgrAbility program. AgrAbility is a grant funded by the USDA. DVR uses AgrAbility's services to provide assessments and recommendations for rehabilitation technology if a DVR consumer identifies self-employment as an IPE goal and owns a farm business. Easterseals is able to offer business planning services for individuals who would like to pursue self-employment. DVR also partners with AgrAbility to provide training for youth and students interested in employment in the agricultural sector. WI Easterseals AgrAbility holds quarterly meetings to improve communication and outreach. Easterseals AgrAbility has provided on-site farm and rehabilitation technology training to staff who serve farmers, to provide exposure to farm environment, work tasks and rehabilitation technology.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

DVR works with non-educational agencies serving out-of-school youth through multiple approaches to promote competitive integrated employment. One method is enrolling youth who are no longer in secondary education into Project SEARCH. On average DVR has between 40-60 out-of-school youth enrolled in Project SEARCH annually, across the state. Project SEARCH is a business led collaboration, developed at Cincinnati Children's Hospital Medical Center in 1996, that enables young adults with disabilities to gain and maintain employment through a 9-12 month training and career exploration program within a community business. The goal upon program completion is for these youth to obtain competitive placements at the host business or in the community, based on the skills and experience learned during Project SEARCH participation.

DVR staff work with youth ages 18-24 at the Racine Youthful Offenders Correctional Facility in Racine, WI. DVR will do a virtual meeting every one to two months to justice-involved youth to make them DVR applicants and proceed with steps to determine eligibility. In advance of release date, the DVR correctional team reaches out to the local DVR offices youth will be released to pre-schedule IPE development meetings in advance of release. The day youth are released from the correctional facility their DVR case is transferred to the local office. This coordinated effort with the correctional facilities ensures youth receive coordinated DVR services upon release and access to services that promote competitive integrated employment.

There will be an initiative and focus, moving forward, with the two Department of Corrections (DOC) Youth Facilities to ensure those youth with disabilities are connected to DVR as they leave incarceration and move back to their home communities. This collaboration encourages participation with DVR services that promote employment and other supportive services.

DVR has agreements with the Oneida Nation and the College of Menominee Nation to receive Section 166 grant (Title I) services, which include services employment services to youth.

Lastly, DVR has been in collaborative discussions with the Wisconsin Department of Children and Families (DCF) that administers the Foster Care program. WI Transitional Resource Areas (TRA) have presented to DVR managers, and some have coordinated services locally to youth exiting foster care to increase the likelihood of successful employment for these youth. In the future, DVR will be focusing on meeting with TRAs, once again and continuing outreach and coordination.

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.);

In Wisconsin, the Wisconsin Department of Health Services (DHS) is the state Medicaid agency responsible for providing long-term support services to children and adults with physical and developmental or intellectual disabilities. DHS is also the state agency responsible for providing mental health services to children and adults.

Interagency Agreements

- DVR has a Memorandum of Understanding with DHS that defines the roles of DVR and Long-Term Support. Linked here is the: [Interagency MOA DVR and DHS Medicaid Services](#) To aid in implementation, DVR and DHS have created an Adult Technical Assistance Guide (TAG) intended to improve communication, coordination, and services for adults with disabilities seeking integrated employment who participate in either the Family Care, Family Care Partnership, PACE, or IRIS long-term care programs and are jointly eligible for DVR services. It is designed to be useful for all persons and agencies involved in the process of vocational placement and providing long-term support for CIE. The Adult TAG can be found at: <https://www.dhs.wisconsin.gov/familycare/mcos/integratedemploy.pdf>.
- DVR has an Interagency Agreement on Transition in place that defines relationships, policies, and procedures between DVR, Department of Public Instruction, and Department of Health Service. This [Interagency Agreement with DPI, DVR, DHS](#) is designed to create common understanding and establish collaborative efforts regarding services that will ultimately improve CIE outcomes for students with disabilities who may be eligible for DVR services. This interagency agreement focuses on both students with disabilities transitioning from high school and young adults with disabilities who have an expectation for competitive integrated employment. The three agencies also jointly developed a Transition Action Guide, which puts the agreement into practice.

Supporting Activities/Resources

- Act 178 Increasing Competitive Integrated Employment Outcomes: 2017 Wisconsin Act 178 requires the Wisconsin Department of Workforce Development's Division of Vocational Rehabilitation (DVR), the Wisconsin Department of Health Services (DHS), and the Wisconsin Department of Public Instruction (DPI) to collaborate, with the input of stakeholders, in the development of a joint plan to increase Competitive Integrated Employment (CIE) in Wisconsin. The CIE Joint Plan establishes DVR, DHS, and DPI performance improvement targets, describing the specific coordination methods that will ensure programs, policies, and procedures statewide support CIE outcomes for youth and adults with disabilities in Wisconsin. The plan also requires the Departments to share best

practices and success stories in serving students and youth with disabilities and post them on the CIE website, found at: <https://dwd.wisconsin.gov/dvr/partners/cie/> The current bi-annual plan includes Department goals to be achieved in State Fiscal Year (SFY) 2026-2027. It includes information that relates to working-age individuals with disabilities who have Individualized Educational Programs (IEPs) with DPI or are receiving services through DHS long-term care (LTC) programs for adults, DHS Children's Long-Term Support (CLTS), DHS Mental Health, Individual Placement and Supports (IPS), DVR, or Youth Apprenticeship (YA).

- Wisconsin Community of Practice on Transition: The Wisconsin Community of Practice on Transition is an interagency collaboration that includes partners from DVR, DPI, DHS, BPDD, the Wisconsin Family Assistance Center for Education, Training & Supports (WI FACETS), the Wisconsin State Parent Education Initiative (WSPEI), the UW Waisman Center, Wisconsin Technical Colleges, and parents. The mission of this collaboration is to bring stakeholders together to impact policies, practices, and outcomes for youth with disabilities transitioning to adult life.
- Individualized Placement Services (IPS): DVR and the DHS's Division of Care and Treatment Services coordinate oversight of IPS. IPS services require a specific agreement with DVR and approval from DHS to provide IPS. IPS is an evidence-based model of supported employment for individuals experiencing significant mental health issues. IPS supports individuals experiencing mental health issues in their efforts to achieve steady employment in competitive integrated jobs, either part-time or full-time. The individual consumer or job seeker:
 - Receives support from Comprehensive Community Services (CCS), a Community Support Program (CSP), or other approved case management program.
 - Must have primary diagnosis of serious and persistent mental illness or alcohol or drug abuse.
 - Is provided with IPS model information and given the choice to participate in IPS.
 - Is referred to DVR upon choosing to participate in IPS programs.

To receive support through training, technical assistance, and fidelity reviews, an IPS site should be part of the statewide learning collaborative, take part in regular fidelity reviews, attain a score of "good" within two years of implementation (or other interval as identified by the IPS state trainers), and report IPS data quarterly. IPS state trainers create annual work plans to include expanding access to IPS statewide and improving fidelity to current IPS sites. More information about IPS can be found at <https://www.dhs.wisconsin.gov/ips/index.htm>

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

The Wisconsin Department of Health Services (DHS) is the state agency responsible for providing services to children and adults with developmental or intellectual disabilities.

Interagency Agreements

- DVR has a Memorandum of Understanding with DHS that defines the roles of DVR and Long-Term Support. Linked here is the: [Interagency MOA DVR and DHS Medicaid Services](#). To aid in implementation, DVR and DHS have created an Adult Technical Assistance Guide (TAG) intended to improve communication, coordination, and services for adults with developmental disabilities seeking integrated employment who participate in either the Family Care, Family Care Partnership, PACE, or IRIS long-term care programs *and* are jointly eligible for DVR services. It is designed to be useful for all persons and agencies involved in the process of vocational placement and providing long-term support for competitive integrated employment (CIE). The Adult TAG can be found at: <https://www.dhs.wisconsin.gov/familycare/mcos/integratedemploy.pdf>.
- DVR has an Interagency Agreement on Transition in place that defines relationships, policies, and procedures between DVR, Department of Public Instruction (DPI), and DHS. This [Interagency Agreement with DPI, DVR, DHS](#) is designed to create common understanding and establish collaborative efforts regarding services that will ultimately improve CIE outcomes for students with disabilities who may be eligible for DVR services, this includes students and youth with developmental disabilities. This interagency agreement focuses on both students with disabilities transitioning from high school and young adults with disabilities who have an expectation for competitive integrated employment. The three agencies also jointly developed a [Transition Action Guide](#), which puts the agreement into practice.

Supporting Activities/Resources

- Act 178 Increasing Competitive Integrated Employment Outcomes: 2017 Wisconsin Act 178 requires the Wisconsin Department of Workforce Development's Division of Vocational Rehabilitation (DVR), the Wisconsin Department of Health Services (DHS), and the Wisconsin Department of Public Instruction (DPI) to collaborate, with the input of stakeholders, in the development of a joint plan to increase Competitive Integrated Employment (CIE) in Wisconsin. The CIE Joint Plan establishes DVR, DHS, and DPI performance improvement targets, describing the specific coordination methods that will ensure programs, policies, and procedures statewide support CIE outcomes for youth and adults with disabilities in Wisconsin. The plan also requires the Departments to share best practices and success stories in serving students and youth with disabilities and post them on the CIE website, found at: <https://dwd.wisconsin.gov/dvr/partners/cie/>. The current bi-annual plan includes Department goals to be achieved in State Fiscal Year (SFY) 2026-2027. The CIE report was written using baseline data before implementation of the CIE plan. It includes information that relates to working-age individuals with disabilities who have Individualized Educational Programs (IEPs) with DPI or are receiving services through DHS long-term care (LTC) programs for adults, DHS Children's Long-Term Support (CLTS), DHS Mental Health, Individual Placement and Supports (IPS), DVR, or Youth Apprenticeship (YA).
 - Activities Supporting Wisconsin's Joint CIE Plan:
 - DVR hosts a monthly meeting to discuss capacity building. Among the topics discussed is how we can ensure consumers enjoy a seamless transition from services funded by DVR and DHS.

- DVR also participates in the quarterly External Employment workgroup hosted by DHS. This meeting likewise addresses topics that affect the consumer experience.
- In these meetings, DVR regularly shares information about the current state of provider capacity and solicits feedback from members of the group about emergent concerns related to provider capacity. DVR also solicits suggestions for how to address capacity shortages.
- Prior to this state plan period, DVR and DHS jointly identified points in time at which representatives from DVR and the Managed Care Organization or IRIS Consultant Agency are required to meet to ensure a smooth transition between funding sources for consumers with developmental disabilities.
- Wisconsin Community of Practice on Transition: The Wisconsin Community of Practice on Transition is an interagency collaboration that includes partners from DVR, DPI, DHS, Board for People with Developmental Disabilities (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.
- Board for People with Development Disabilities (BPDD): BPDD is the Wisconsin board that is charged with bringing people together to solve problems, remove barriers and create statewide change for the developmental disability community. DVR's Director for the Bureau of Consumer Services serves on this board.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

In Wisconsin, the Wisconsin Department of Health Services (DHS) is the state agency responsible for providing mental health services to children and adults. DVR has an [Interagency Memorandum of Understanding](#) with the Wisconsin Department of Health Services, Division of Care and Treatment Services (DCTS), Bureau of Prevention and Recovery, that governs cooperative service delivery for Individual Placement and Support (IPS) in Wisconsin. DVR has actively collaborated with DCTS to provide training to Service Providers, VR staff, and County Mental Health staff. DVR staff members meet weekly with DCTS counterparts to coordinate efforts to outreach to counties and agencies statewide who are interested in providing IPS. DVR and DCTS staff provide initial and ongoing training to IPS site staff. DVR staff have actively participated in fidelity reviews of IPS providers and provided technical assistance to VR staff, service providers and County Mental Health staff. DVR has also supplied DHS partners with additional data for the purposes of program evaluation and monitoring impacts of effort, including the number of consumers served and placement rates. Wisconsin Act 178 also guides and requires the Department of Workforce Development's Division of Vocational Rehabilitation (DVR), the Department of Health Services (DHS), and the Department of Public Instruction (DPI) to collaborate, with the input of stakeholders, in the development of a joint plan to increase Competitive Integrated Employment in Wisconsin, which includes individuals with mental health disabilities.

[Wisconsin Act 178 Information](#)

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. DVR also has cooperative agreements with two federally recognized tribes, Lac Courte Oreilles and Oneida, the College of Menominee Nation and the Great Lakes Inter-Tribal Council (GLITC). The agreements include specific logistical agreements for processing interagency referrals, coordinating services and expenditures, cross training, and resolving disputes. 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.

Many of DVR's service providers are private non-profit organizations. DVR partners with around 200 providers that deliver vocational rehabilitation services to assist individuals with disabilities to obtain and maintain competitive and integrated employment within the community. DVR uses an outcome- based statewide fee structure with associated technical specifications for commonly used and available services including Pre-ETS services.

The services most commonly purchased from non-profit vocational rehabilitation service providers include:

- Customized Employment
- Individual Placement and Support (IPS)
- Internship Temporary Work
- Job Preparation Development and Placement
- Student Work Based Learning Services
- Supported Employment
- Job and Task Analysis/Systematic Instruction

- Vocational Evaluation
- Work Incentive Benefits Analysis

Agencies wishing to provide these services complete a two-year service agreement with DVR. The statewide rates, technical specifications for the services, service provider agreement information, and a listing of providers that have a signed agreement with DVR are posted on the DVR public website at: <https://dwd.wisconsin.gov/dvr/service-providers/>

Other paid services with technical specifications provided by non-profit organizations include:

- Assistive Technology
- Explore Work
- Job Shadow
- On the Job Assessment
- Partners with Business
- Skills to Pay the Bills
- Project SEARCH
- Visual Resume
- Walgreens Retail Employees with Disabilities Initiative (REDI)

Throughout the year, training and input meetings are held statewide with agencies and individuals providing services to DVR consumers. These DVR service provider meetings offer an opportunity for feedback and to review service agreement content for the next contract period. If an agency is interested in developing a project outside of statewide services, there is an established project submission process for review and consideration by the Bureau of Consumer Services and Bureau of Management Services staff. Potential projects are reviewed for alignment with strategic and other priorities including any need for Pre-ETS services.

DVR Workforce Development Area (WDA) Directors and WDA staff coordinate regional meetings at least 2-4 times per year. DVR's Bureau of Management Services holds at least 2 statewide service provider meetings each year and also organizes a service provider advisory council to gain feedback and input. DVR may also invite VR service providers to 'study hall' trainings or webinars as appropriate to provide clarifications or service updates.

The DVR Service Provider Portal has also been enhanced to include a map that offers service demand and capacity information. The map and portal have been improved during the most recent State Plan period and allow service providers to access documents, billing information and some consumer information directly from the password protected portal to assist in quality service delivery.

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 VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.

The State Plan must include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
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:
3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

The State Plan must include
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.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.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.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services 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.

The State Plan must include
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.
4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.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
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.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:

The State Plan must include
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that 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.

Do you attest that these assurances will be met?

Yes

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS
APPROPRIATE

Wisconsin Department of Workforce Development, Division of Vocational Rehabilitation

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 (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] 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[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], 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;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Wisconsin Department of Workforce Development

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, 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^[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS^[6], 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;

^[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

^[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

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);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Meredith Dressel

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Division Administrator

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Meredith Dressel
Title of Signatory	Division of Vocational Rehabilitation Administrator
Date Signed	11/20/2025

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

The submission of expected levels is the first step in the negotiations process. Once the expected levels of performance have been submitted, State VR programs may begin negotiations with RSA's State Monitoring and Program Improvement Division. Each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers (ESE)

The ESE indicator has been defined in the ESE final rule and PY 2024 was the first year of data for the newly defined performance indicator. However, a minimum of at least two baseline years of data must be collected to support a statistical adjustment model that could produce sufficiently reliable estimates for the purposes of performance negotiations and state performance assessments. The Departments, in accordance with 20 CFR § 677.190(c)(4) and 34 CFR §§ 361.190(c)(4) and 463.190(c)(4), will collect and monitor state ESE performance results for at least PY 2024 and PY 2025 to establish a credible baseline and provide technical assistance. After PY 2025 data are collected the Departments will develop a statistical adjustment model for ESE in accordance with section 116(b)(3)(A)(viii) of WIOA. Since the ESE indicator is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs when feasible. While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	TBD	49.5%	TBD
Employment (Fourth Quarter After Exit)	48.5%	TBD	48.4%	TBD
Median Earnings (Second Quarter After Exit)	\$3437	TBD	\$3200	TBD
Credential Attainment Rate	32.5%	TBD	33.0%	TBD
Measurable Skill Gains	62.5%	TBD	62.5%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

GENERAL EDUCATION PROVISION ACT SECTION 427 ASSURANCE - VOCATIONAL REHABILITATION

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to applicants for grant awards under this program. All applicants for new grant awards must include the following information in their applications to address this provision in order to receive funding under this program. (OMB Control Number 1894-0005)

Compliance can be found on the following page(s) of the application:

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to

include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

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:

(OMB Control Number: 0970-0145)

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 Wisconsin Works (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 2025

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 longterm 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 2013-2025 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.

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 selfsufficient 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 workexperience 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 W2 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 health care. Meeting these needs helps the family to achieve and/or maintain economic stability. The EP is reviewed and updated at least once every six months, and may be updated more frequently if individual circumstances change. (See [W-2 Manual Chapter 6.](#))

W-2 Program Paid and Unpaid Placements

The W-2 program has paid placements in which the participant receives a monthly payment, a subsidized employment placement in which the participant receives a subsidized wage, and unpaid placements in which the participant receives case management services only. Every applicant and participant is assigned to a placement to meet his or her individual needs. The W-2 program has multiple placements to meet the needs of eligible parents with varying skills and circumstances.

W-2 Paid Placements

The W-2 program's paid placements are: Community Service Job (CSJ); W-2 Transition(W-2 T); Custodial Parent of an Infant (CMC); and At-Risk Pregnancy (ARP).

1. CSJ placements are for individuals who need to develop basic skills and work habits in a work training environment. Two-third, one-half, and one-third time CSJ placements may be used for individuals already working part-time who need to develop additional skills for full-time employment. CSJ participants are expected to complete 40 hours of activities per week but can be assigned fewer hours depending on the participant's circumstances. Of these 40 hours, up to 10 hours per week can be in education and training activities. CSJ work training hours countable toward the maximum 40 hours of activity as approved by the FEP may include:
 - Work experience;
 - Training activities conducted at the CSJ work training site;
 - Other assigned work training activities, such as:
 - Job search activities;
 - Vocational rehabilitation; and
 - Meetings with child support agency staff, social workers, health care professionals or other meetings approved by the FEP and necessary to prepare a participant for employment.

Training Activities

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.

The following are considered **education and training** activities (education and training can be up to 10 hours of the total 40 hours/week of activities) for W-2 participants:

- A course of study meeting the standards established under Wis. Stats. § 115.29(4) for the granting of a declaration of equivalency of high school graduation.
- English-as-a-Second Language. Adult basic education courses.
- Technical college courses and other educational courses that provide an occupational skill.
- Employer-sponsored training.

W-2 agencies coordinate with technical colleges to offer certified (or diploma/degree) training programs and also work directly with employers to develop on-site training opportunities.

These training courses must be tied directly to occupations for which there are job openings in the community. Examples include, but are not limited to:

Basic welding, keyboard/data entry, certified nursing assistants, utility installation, office software, food preparation, electronic assembly, child care, press production, entrepreneurial/small business; and hospitality training.

Work training helps to prepare participants for unsubsidized employment (Work training can be up to 40 hours of the 40 hour/week activities).

The following are considered **work training** for W-2 Participants:

- Vocational Rehabilitation, which is supervised unpaid training at a work site at a public business or organization, private not-for-profit business or organization, or a private-for-profit business or organization;
 - Training activities conducted at the CSJ work site.
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 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 24month 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 48month 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.](#))

Hardship Definition

From [Wis. Admin. Code DCF 101.095\(5\)](#)

A W-2 agency may, subject to subs. (6) and (7), extend the 48-month lifetime limit under sub. (1) if the agency determines that the individual meets the conditions in par. (a) or (b) as follows:

(a) *Hardship.* The individual is experiencing hardship due to any of the following:

1. The individual is unable to work due to a personal disability or incapacitation.
2. The individual needs to remain at home to care for a member of the individual's Wisconsin works group whose incapacity is so severe that without in-home care provided by the individual the health and well-being of the Wisconsin works group member would be significantly affected.
3. The individual has significant limitations to employment such as any of the following:
 - a. Low achievement ability, learning disability, or emotional problems of such severity that they prevent the individual from obtaining or retaining unsubsidized employment but are not sufficient to meet the criteria for eligibility for supplemental security income under 42 USC 1383c or social security disability insurance under 42 USC 401 to 433.
 - b. Family problems of such severity that they prevent the individual from obtaining or retaining unsubsidized employment.
4. The individual has made all appropriate efforts to find work and is unable to find employment because local labor market conditions preclude a reasonable job opportunity. In this subdivision, "reasonable job opportunity" means a job that pays at least minimum wage and conforms to all applicable federal and state laws. The W-2 agency shall document at least one of the following:
 - a. The inability of W-2 participants with similar skills or engaged in job searches in similar geographic and occupational areas, to find unsubsidized jobs.
 - b. The unavailability of jobs in labor market sectors that match the individual's skills, as supported by specific examples of layoffs in these labor market sectors or by labor market data published by the department of workforce development or the United States department of labor.
 - c. The unavailability of jobs in the labor market within a reasonable distance and travel time of the individual's home, as supported by specific examples of layoffs in this labor market or by labor market data published by the department of workforce development or the United States bureau of labor statistics.
5. The individual is unable to work due to current participation in a substance abuse treatment program certified to provide treatment for substance abuse under ss. DHS 75.10 to 75.15 or psychosocial rehabilitation services as approved by the department.

(a) *Battered or subjected to extreme cruelty.* The individual's Wisconsin works group includes a member who has been battered or subjected to extreme cruelty based on the fact that the member has been subjected to any of the following:

1. Physical acts that resulted in, or threatened to result in, physical injury to the individual.
2. Sexual abuse.

3. Sexual activity involving a dependent child.
4. Being forced as the caretaker relative of a dependent child to engage in nonconsensual sexual acts or activities.
5. Threats of, or attempts at, physical or sexual abuse.
6. Mental abuse.
7. Neglect or deprivation of medical care.

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 W2 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.

Eligibility Criteria

- a. Be a *Custodial Parent (CP)* (see [2.3.1](#) for adult CPs or [17.2.1.1](#) for minor CPs) or
- b. Be a NCP (see [17.2.1.2](#));
- c. Meet all other W-2 nonfinancial and financial eligibility criteria as defined in W-2 Manual Chapters 2 and 3;
- d. Need the loan to address an immediate and discrete financial crisis that is not the result of the individual's failure to accept a bona fide offer of employment or the individual's termination of a job without good cause. The individual must be either: employed and need the loan to continue employment; or need the loan to obtain employment.
- e. Not be in default in the repayment of any current JAL or cash assistance overpayment recoupment;
- f. Not be a migrant worker; and
- g. Have an acceptable repayment plan as defined below:
- h. The W-2 agency has completed a budget with the applicant which demonstrates the applicant's ability to repay the loan in cash within the agreed upon repayment timeframe making regular monthly payments.

- i. The W-2 agency works with the applicant to develop an agreed upon repayment plan which may include in-kind community service work. At least 25% of the loan must be repaid in cash.
 - j. The initial repayment period may be up to 12 months and may be extended to 24 months at the time of repayment renegotiation.
 - k. No outstanding balance due can exceed \$1,600 in any 12 month period for any one loan recipient.
 - l. JAL applicants meeting these eligibility criteria are not entitled to a loan but may be approved for a loan as long as funding is available.
4. Refugee Cash Assistance (RCA) is a time-limited program for refugees who have a low income, 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 [Bureau of Refugee Programs Policy Manual](#)) 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 five hours a week and limited to a maximum of two years). The individual must earn less than 185 percent of the FPL at initial eligibility and less than 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 percent FPL remains eligible until the individual's family income

exceeds 85 percent of the state median income (SMI). Wisconsin will define exceeding 85 percent of the SMI as the countable gross income for the assistance group exceeding that level for two consecutive months. Depending on family size, 85 percent of Wisconsin's SMI is estimated to equate to between 205 percent and 299 percent of the FPL. Starting in SFY 2025, the family's copayment increased by \$1.00 for every \$5.00 by which the family's gross income exceeds 200 percent 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.

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\(3m\)\(c\)](#). This program aligns with TANF Purposes 1 and 2.

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. This program targets service delivery to the most vulnerable populations which include families from the lowest income neighborhoods of their service-delivery areas. These services also support fatherhood initiatives and two-parent families as a stabilizing force in the lives of children. This program aligns to Purposes 3 and 4 by preventing and reducing the incidence of out-of-wedlock pregnancies and encouraging formation and maintenance of two-parent families by offering services to strengthen parenting skills, improve parent and child family relationships, prevent out-of-home placements of children and encourage family participation.

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 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 100 percent TANF funds for this program (per federal requirements relating to services for TANF Purpose 4).

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 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).

This program falls under TANF Purpose 4, which does not require a definition of needy. Due to the nature of matching necessary services to the grant recipient’s location, each organization has its own eligibility criteria. Here is information on two grant recipients:

Dane County Department of Human Services uses this grant to expand prevention services aimed at reducing the contact families may have with the child welfare system and preventing the removal of children from their homes. The organization has implemented enhancements to the Northside Early Childhood Zone (NECZ), a two-generational home visiting approach to enhancing parents’ capacities to support their children to reach their potential and reduce formal intervention with Dane County CPS for families at the highest risk of child neglect. The DCF Prevention Grant will provide greater access to employment and education supports and mental health therapist services. Vitality Cafes and additional trainings will be implemented. The organization decides eligibility using an assessment tool for screening for child neglect and neediness:

- Eligible for Tier 1 services: Families with children under the age of four who are currently residing in the 53704 zip code and are screened as high-risk for neglect.
- Eligible for Tier 2 services: Families already receiving NECZ services that do not screen as high-risk for neglect.
- Eligible for Tier 3 services: Families from Madison’s north side with children ages 0-5

who are in need of concrete basic needs supports.

Northwest Connection Family Resources, Hayward, Wisconsin

Northwest Connection Family Resources has implemented the Community Response program model with 'Northern Enhancements' in accordance with the Community Response Program Manual. This short-term prevention program includes case management, home visits, collaborative goal setting, comprehensive family assessments, and flex funds to address critical financial stressors. After a referral is made, the Community Response Specialist (CRS) calls the family within four days to introduce the program and schedule a follow up appointment. The CRS notifies the family that services are voluntary and explains the purpose of the program. The CRS completes an intake process. Services are provided in the family's home or a location convenient for the family. Services are typically provided for 12-20 weeks, though Northwest Connection Family Resources will extend the length of services based on family need.

Additionally, Northwest Connection Family Resources will provide new baby visits to parents of newborns, which includes one visit at the hospital (when timing allows/when hospital is open to visitors), three additional home visits may be offered based on the parental/newborn needs in the family's home. The Period of Purple crying program will be implemented. Two Parent Cafés will also be offered. (Additional Parent Cafés may be offered based on funding). Each Parent Café will include three two-hour sessions that include greetings, family dinner or snacks, parent discussions in small groups, a family activity (materials/supplies needed provided to each family by delivery or pick-up if offered virtually), and goodbye closing.

Eligibility: Northwest Connection Family Resources will provide Community Response services to families in Sawyer County and the Lac Courte Oreilles Tribe who are screened out after a Child Protective Services report has been made or when the case is closed after an initial assessment. Eligibility will be expanded and referrals will also be received from other community partners such as schools and health care centers (Eligibility will be expanded to serve families who are working in Sawyer County or have children enrolled in child care or school in Sawyer County.) This allows families who identify Sawyer County as their primary community for services to receive CRP services. It is anticipated that 100 new parents will receive new baby visits and/or complete "Babies Cry: Be Prepared" created by the Child Abuse and Neglect Prevention Board annually and that up to 40 adult participants and their children will participate in Parent Cafés during the grant period. Families participating in CRP, New Baby Hospital visits, New Baby Visits and/or Parent Café will have access to additional concrete supports; to help families increase family functioning, reduce family stress and increase the likelihood to make progress or meet their identified goals. Additionally, concrete support and/or Triple P one on one may be provided as outreach to engage families as a gateway to potential enrollment.

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. Brighter Futures offers services with the purpose of preventing and reducing the incidence of nonmarital pregnancy; youth violence; youth alcohol and other substance use and abuse; child abuse and neglect; and to increase adolescent self-sufficiency by encouraging high school graduation, vocational preparedness, improved social and other interpersonal skills and responsible decision making. This program aligns to Purposes 3 and 4 by preventing and reducing the incidence of out-of-wedlock pregnancies and encouraging formation and maintenance of two-parent families by offering services to strengthen parenting skills, improve parent and child family relationships, prevent out-of-home placements of children and encourage family participation.

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 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 percent 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. This program falls under TANF purpose 4.

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. This program falls under TANF Purpose 2.

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.

The state's EITC functions as a supplement to low-income working families with children. The amount per family is based on a percentage of the federal EITC, with adjustments made for family size. People in Wisconsin are eligible to receive the tax credit if they had at least one qualifying child residing with them, were a full-year Wisconsin resident, and qualified for the federal EITC. According to the IRS website, to generally qualify for EITC, an individual must have worked and earned income under \$59,187; have investment income below \$10,300; have a valid SSN; be a U.S.

citizen or resident alien; and not have filed a tax form regarding Foreign Earned Income. This program falls under Purpose 2, reducing the dependency of needy parents by promoting job preparation, work, and marriage

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.

Students are eligible for this program if they receive free or reduced-price lunch. Based on a 2023 notice from USDA, the free lunch income threshold is 130 percent FPL, while reduced price is 185 percent FPL. Categorical eligibility for FRL can also be extended through SNAP or TANF participation, as well as enrollment in Head Start (or other pre-K programs with same or stricter eligibility than Head Start) or status as homeless, a migrant, runaway, or foster child. This program falls under Purpose 1, assisting needy families so that children can be cared for in their own homes.

Energy Services

DOA administers the federal Low-Income Home Energy Assistance (LIHEAP), TANF, and state funds that assist needy families (those under 60 percent 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. This program falls under Purpose 1, assisting needy families so that children can be cared for in their own homes.

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 100 percent TANF funds for this program (per federal requirements relating to services for TANF Purpose 4). 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. This program is included under Purpose 4. The goal of the program is to keep families intact whenever possible by employing strategies and services controlling for child safety, family stabilization, and helping the family develop links to community supports which fulfills the purpose of forming and maintaining families.

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 increased from \$300 to \$375. Financial eligibility: participants meet the definition of "needy" and children removed from parental homes are considered to have no financial resources. This fulfills Purpose 1, as it assists needy families so children can stay in their homes. (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. This fulfills Purpose 1, as it assists needy families so children can stay in their homes. The financial eligibility for it is only having \$2,000 in countable income for an individual and \$3,000 for a married couple. (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:

1. 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);
2. not be participating in a W-2 paid placement;
3. have an annual household income below 150 percent of the federal poverty limit;
4. have been unemployed for at least four weeks; and
5. 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 18 through 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. The TJ/TMJ programs serve Purpose 1 – Per [ACF guidance from the 2009 ARRA](#), federal TANF funds may be used, “to serve older youth in non-assistance programs, such as subsidized employment, under TANF statutory Purpose One.” In the 2009 ARRA guidance, ACF indicates that a state could reasonably set an age for a child including an individual under age 25. These programs also serve Purpose 2 – In addition to serving childless adults between the ages of 18 and 25, both programs provide employment services to parents of minor children, in particular parents 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 reunification plan.

Wisconsin Community/Community-Building Milwaukee (CBM) Services Training Workshops

DCF contracts with Wisconsin Community Services (WCS), a non-profit, which provides community-building facilitator-training workshops to organizations in the city of Milwaukee that

work with needy individuals who are eligible for TANF programs; this program is directed towards staff who work with needy individuals who are TANF eligible. 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. To increase accessibility, WCS continues to offer a hybrid service delivery model that combines in-person and virtual formats. This approach ensures that TANF participants can engage in workshops and training in ways that best suit their needs, while still receiving high-quality development of interpersonal communication skills. Whether attending in person or online, participants benefit from flexible, impactful learning experiences that foster deeper connections and support positive outcomes for families.

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. This program fulfills Purpose 4, as the community organizations the recipients work for deliver services which assist in forming and maintaining 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..

Fostering Futures: Connections Count

2015 Wisconsin Act 55 authorized a program under which DCF contracted with local organizations to provide services, such as employing 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). This program fulfills Purpose 4, as the connections made assist in maintaining two parent families.

Adult Literacy Grants and GED Services

DCF is authorized to award grants to qualified applicants to provide literacy services and 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). 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. 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). These programs fall under Purpose 2. Literacy and the lack of a high school diploma can affect an individual's ability to gain and maintain employment. Providing services to improve literacy and make GED testing and preparation more accessible arguably fits the purpose of promoting job preparation and work by equipping participants with the literacy and GED skills needed to gain and maintain employment.

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 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.

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. Eligibility is for youth from households with income at or below 200 percent FPL. 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 followup 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 TANF funding results in \$1 million in total funding. Wis. Stat. § 49.175 (1)(LM). This program falls under Purpose 1, as it supports keeping TANF-eligible youth in school through graduation and provides supportive services to assist participants with transitioning to work, military, and/or post-secondary education.

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. 75 percent of payments for current support are passed-through to the families. 75 percent of payments for past-due support during W-2 participation time periods and 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.](#)) Eligibility is 115 percent of FPL, as it is for W-2 participants. This falls under Purposes 1 and 2, as there is a connection between insulating low-income families from economic shocks by increasing income and a decreased risk of child welfare system involvement, which keeps children at home with their parent(s) and ending dependence on government benefit programs.

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.](#)) This program falls under Purpose 2: as it provides employment and training services to noncustodial parents in order to promote their ability to pay child support and increase involvement in the lives of their children.

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. This is a Separate State Program. This program falls under TANF Purposes 1 and 2.

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 300 percent of the FPL. This falls under Purpose 1, assisting needy families so children can be cared for in their homes. Providing crisis, safety, and support services to domestic violence victims improves safety in the home, increasing chances that children can remain safely in their own homes.

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.

This service is for individuals receiving W-2 benefits and/or services, so financial eligibility is 115 percent of FPL. This falls under Purpose 1. (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 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. This

program falls under Purposes 1 and 2. Substance abuse issues can pose significant barriers to work and can result in children being placed in out-of-home care. By providing services to address underlying substance abuse issues, the program mitigates unsafe circumstances caused by substance abuse that can lead to a child's removal from the home. In addition, these services mitigate the obstacle substance abuse can pose to gaining and maintaining employment, consistent with Purpose 2.

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 who are 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. This program falls under Purpose 4, encouraging the formation and maintenance of two parent families.

B. REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

W-2's goal is to connect parents with appropriate work or work training as soon as possible. A W-2 participant is placed in the highest possible employment or work-training level according to his or her ability. As participants gain work experience and skills, they are expected to move up to the next appropriate level of work or training at the earliest opportunity. Unsubsidized employment is the goal for most W-2 participants, and applicants may be required to search for unsubsidized employment while their applications are pending. The EP includes the specific program activities for the W-2 participant to achieve employment. These program activities focus on the participant's employment, family, and personal needs identified in assessments and screenings. (See W-2 Manual Chapter 6, W-2 Manual Appendix on Activity Codes, and information on the Employability Plan within section above.)

Ongoing Case Management and Supportive Services

The W-2 FEP provides ongoing case management for the W-2 participant, including periodic reassessment of the current placement based on circumstances at the time. The FEP works with the W-2 participant to assist in addressing family and work-related needs before situations result in a family crisis, nonparticipation in program activities, and/or loss of employment. The FEP provides information necessary to connect applicants/participants with supportive services available within the agency as well as other resources in the community. Supportive services may include housing, child care, transportation, family health care, economic supports, household budgeting, employment support needs such as work connection and retention services, and other needs identified by the participant that impede the participant's ability to find and retain a job. (See W-2 Manual Chapter 7.)

W-2 Employment positions (Work Training or Subsidized Employment placements)

The W-2 FEP may offer the W-2 applicant a work training placement (TEMP, CSJ or W-2 T), if the applicant's good-faith attempts to obtain employment have been unsuccessful, or if the W-2 agency determines that the applicant is not prepared for unsubsidized employment. While participating in a work training placement, the W-2 participant may be required to continue appropriate ongoing employment search with the assistance of the W-2 agency. (See W-2 Manual Chapter 7.)

W-2 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.)

The W-2 Manual discusses the inability to find needed child care in [Chapter 11.3.3.1.2.](#)

Demonstrating an Inability to Obtain Child Care

An inability to obtain child care must be based on the following reasons:

1. Formal child care is not available within a reasonable distance from the parent's home or work site. Formal child care is considered available if there is at least one licensed or certified child care facility with space available for the child. The certified or licensed child care facility, including a W-2 agency with certified or licensed on-site child care, must not be considered available if there is documentation that the facility would be harmful to the health or safety of the child. A reasonable distance is determined on a case-by-case basis between the participant and the worker.
2. Informal child care by a relative or under other arrangements is unavailable or unsuitable. Informal child care is defined as an arrangement in which the child care provider is neither licensed nor certified. Informal child care arrangements may be used by any W-2 participant; however, a participant cannot be required to use informal child care. (See [Child Care Policy Manual, Chapter 1](#))

Child Care Type	Reason

Formal Child Care: Provided by a certified or licensed child care facility.	• Child care is not available in a reasonable distance*. • Child care facilities in the area do not have space available for the child. • Certified or licensed child care facilities, including a W-2 agency with certified or licensed on-site child care, must not be considered available if there is documentation that the facility would be harmful to the health or safety of the child.
Informal Child Care: An arrangement where the child care provider is not licensed or certified.	• Child care by a relative or under other arrangements is unavailable or unsuitable. Any W-2 participant can use informal child care, but a participant cannot be required to use informal child care. (See Child Care Policy Manual, Chapter 1)

The FEP will work with the participant to determine what a reasonable distance is on a caseby-case level. The FEP must document the decision that is made and reason(s) in PIN comments. If the participant fails to demonstrate an inability to obtain child care, he or she may face payment reductions for nonparticipation. An inability to obtain appropriate child care may be indicative of a shortage of child care providers in the community (including sick child care, evening and weekend care, culturally competent child care, and care for disabled children) and W-2 agency management should be alerted to the problem.

Chapter 11.3.3.1 Child Care Availability

A single parent placed in a W-2 Employment Position cannot be sanctioned for nonparticipation in any W-2 activities during a period of time when they are unable to obtain child care for a child under the age of 13. If child care is only available to the participant during specific hours of the day or days of the week, the W-2 agency must make every effort to assign work activities during those hours. A participant who needs to secure child care arrangements in order to participate in W-2 activities should be assigned the task of securing child care as part of their participation requirements on their Employability Plan (EP).

If the participant has demonstrated an inability to obtain child care, the worker must grant good cause for all nonparticipation, until:

1. Child care is obtained; or
2. The participant no longer demonstrates an inability to obtain child care.

Chapter 11.3.3.1.1 Determining Availability of Child Care

In order to determine if child care is available, a W-2 worker must discuss child care with each participant at the time of the initial assessment and during the review of the W-2 Participation Agreement.

To help the participant locate a child care provider, a W-2 worker must:

1. Explain to the participant their responsibility to obtain any needed child care for the hours of participation in W-2.
2. Determine if informal child care, or formal child care within a reasonable distance from the participant's home, is available. Informal child care arrangements may be discussed, but a participant cannot be required to use an informal child care arrangement. If another parent is in the home, able, and available to care for the child, child care is not needed.
3. Provide information to the applicant or participant about eligibility for W-2 child care assistance and the requirement for the provider to, at a minimum, be provisionally certified to qualify for assistance. (See [Child Care Policy Manual](#))
4. If the participant does not currently have child care available, refer the individual to the local Child Care Resource and Referral Network (CCRR), which is available to help all parents locate safe and affordable child care throughout the state, and other child care resources in the community. If the referrals do not result in the participant locating child care, the W-2 agency may require the individual to demonstrate an inability to obtain child care. (See [11.3.3.1.2](#))
5. If available, offer the use of the W-2 agency on-site child care to the parent until an ongoing child care arrangement is found. A W-2 on-site child care provider must be regulated in order for the parent to leave the premises.
6. Discuss the availability of backup child care arrangements to help the participant plan ahead for emergency situations when their regular provider is unable to care for the child(ren) or when their child is sick and cannot attend their regular child care program.

(ii) Include definitions of the terms “appropriate child care,” “reasonable distance,” “unsuitability of informal care,” and “affordable child care arrangements”.

Appropriate child care: This is formal child care which is a reasonable distance from the parent's home or work site, which is provided by a certified or licensed child care facility, and has space for a child, and is affordable. The certified or licensed child care facility, including a W-2 agency with certified or licensed on-site child care, must not be considered available if there is documentation that the facility would be harmful to the health or safety of the child. Appropriate child care can also be informal child care where the child care provider is not licensed or certified, but a participant cannot be required to use informal child care.

Reasonable distance: The FEP will work with the participant to determine what a reasonable distance is on a case-by-case level.

Unsuitability of informal care: If a participant is using Wisconsin Shares, this is any informal care since parents have to use certified or licensed providers to receive the subsidy. However, W-2 allows informal child care, for unregulated providers, they may operate with three children or fewer, but not able to access WI Shares.

Affordable child care arrangements: The federal Office of Child Care (OCC) defines affordable child care as seven percent of a family's income.

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 W2 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.

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/.](http://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 Employment Plan. 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 workexperience site without good cause, is discharged from employment or training or a workexperience 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 workexperience, 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.

Analysis of Workforce Development Activities

Wisconsin has a robust structure of locally-centered workforce services offered to parents and caretakers with children who receive public assistance. The 11 regionally-specific workforce development boards act as facilitators of relationships between local elected officials, and economic, education and workforce partners which expands and targets workforce opportunities to parents and caretakers receiving assistance. These services are delivered through one-stop hubs, such as the American Job Centers, many of which offer co-located services from both the WIOA program and Wisconsin Works and related programs.

At these one-stop delivery offices, job seekers can find resources such as supportive services, and career or training services. Each local Workforce Development Board, in consultation with job center partners and other community service providers, coordinates supportive service delivery in the local area. 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.

Due to the local nature of the Workforce Development Boards, their partnership with WIOA funded services, and the delivery model of one-stop co-located WIOA and TANF-funded services, there is a nimble response to the local job market and WIOA workers and/or Wisconsin Works agency staff can match program participants to job training or educational needs easily. Below you will see examples of WIOA and Wisconsin Works program participants' success as demonstrations of how these services work in concert to support job seekers in Wisconsin.

Participant Examples

Ebonie, a mother experiencing trauma after her children's father was shot and killed, came to Wisconsin Works for help. Her team connected her to services to help her find a home, transportation, clothing, and food. After her family's immediate needs were met, she used the training and education support offered by the co-located WIOA and TANF service provider, Forward Service Corporation, to earn her driver's license and be placed in a job as a caregiver, which she has held for two years. (Name and story shared with permission <https://fscorp.org/going-beyond-survival/>.)

A father and former salon owner, Gewelesis, wanted to become an electrician but getting the money to pay for training was a challenge. He sought out the Wisconsin Works and WIOA programs to support his education, enrolling in the 1-year Electrical Diploma Program at Fox Valley Technical College. He's currently completing the program and is excited to start a new career. (Name and story shared with permission <https://fsc-corp.org/education-jolts-gewelesisdream/>.)

Erin, a Wisconsin Works participant with five children experiencing domestic abuse, used the Wisconsin Works program and supportive services of the W-2 agency's domestic violence counselors to begin her journey to independence. Her case manager helped Erin to find childcare, supported by state aid, and build skills through a job at Meals on Wheels; building on the skills from this job will help her create a stable environment for their children. (Name and story shared with permission <https://fsc-corp.org/erin-keeps-her-family-safe/>.)

Savannah, a parent of a young child, decided to get her GED and pursue her dream of becoming a nurse. She worked with a WIOA Career Planner to take GED courses and other courses like help with studying, budgeting, transportation to school, and connecting her to employers with openings. Savannah completed her GED and CNA courses, and is on a nursing pathway at a local technical college. (Name and story shared with permission <https://fsc-corp.org/nursingtowards-a-future/>.)

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.

E. ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)

The W-2 program and the programs referenced in this section include TANF-funded programs and services that have established goals and take actions to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on adolescent pregnancy prevention, adolescent parent self-sufficiency, adolescent pregnancy counseling, and adolescent parenting skills. In addition, Wisconsin provides funding for other services, which coordinate with the TANF services, to reduce unintended pregnancies.

W-2 Program's Prevention and Reduction of Out-of-wedlock and Unintended Pregnancies

Although minor parents living outside of an adult-supervised living arrangement are not eligible to receive a W-2 payment, W-2 agencies are required to provide case management services to minor parents (both male and female parents), regardless of their income, assets, or living arrangement. These case management services are required to include discussions of family planning, career planning, and parenting skills.

In addition, the following elements of the design of the W-2 program implements Wisconsin's goals to prevent and reduce out-of-wedlock pregnancies in the population served by W-2:

1. Flat grants: W-2 provides payments based on participation, not family size.
2. Family cap: W-2 does not treat parents who have additional children while on assistance differently for W-2 time limits. Parents caring for a child who is younger than eight weeks old may be eligible to receive a monthly payment for their living expenses that does not include a work requirement. However, parents receiving such payments are exempt from the state lifetime limit only if the child is born less than ten months after the individual was first determined eligible for W-2 or if the child was the result of sexual assault or incest.
3. Case management: W-2 FEPs may counsel participants to delay subsequent births or provide referrals to family planning services. FEPs assist participants in making choices about their career and family, make appropriate referrals based on the family's needs, and encourage the use of resources available to families. Each W-2 agency maintains a list of family-planning referral agencies and health care providers which is available to all customers.

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.

The Wisconsin Department of Health Services (DHS), in coordination with DPI and DCF, have long standing collaborations to promote healthy adolescent development and provide access to confidential contraceptive and related reproductive health information and services. The [20232027 Wisconsin State Health Improvement Plan](#) takes an upstream approach in addressing reproductive and sexual health for all Wisconsinites, including youth. Related priority areas in the plan include supportive systems of care, physical and mental safety, person and community centered health care, and mental and emotional health and well-being. In addition to these priority areas, DHS remains committed to promoting and improving sexual health and reproductive justice across the life span and reducing disparities in reproductive

and sexual health outcomes including sexually transmitted infections (STIs) and unintended teen pregnancies. Wisconsin measures and tracks these outcomes through HIV and STI surveillance systems, birth rate data for teens ages 15-19, and through Youth Risk Behavior Survey (YRBS) data.

The Family Health Section, in the Bureau of Community Health Promotion within the Division of Public Health at DHS manages several programs that contribute to promoting positive youth development, reducing STIs, and reducing unintended teen pregnancies. These programs include but are not limited to the Reproductive Health and Family Planning Program, the Personal Responsibility Education Program (PREP), the Sexual Risk Avoidance Education (SRAE) Program, and the Teen Pregnancy Prevention (TPP) Program. The latter three programs include education interventions directed at preventing and reducing the incidence of unintended teen pregnancies and sexually transmitted infections among youth.

The Personal Responsibility Education Program (PREP) implements educational programming for youth ages 10-19 on both abstinence and contraception for preventing unintended pregnancies and sexually transmitted diseases using a Positive Youth Development framework. Partners implement evidence-based or evidence-informed programs that have been shown to effect changes in behavior. The program serves middle school and high school-aged youth, specifically those who are homeless, in foster care, live in rural areas or in geographic areas with high teen birth rates, or come from racial or ethnic minority groups. Programming includes positive adolescent development, healthy relationships, and healthy life skills, including learning about health care rights and responsibilities.

The Sexual Risk Avoidance Education (SRAE) program implements evidence-based education that teaches youth the benefits of refraining from sexual activity and making informed decisions about their health. The program helps youth navigate life decisions by teaching personal responsibility, self-regulation, goal setting, emotional regulation, building empathy, healthy decision-making, a focus on the future, and the prevention of youth risky behaviors such as drug and alcohol use. SRAE uses a Positive Youth Development framework and collaborates with partners to implement the Teen Outreach Program (TOP), which is designed to build educational success, life and leadership skills, and healthy behaviors and relationships.

The Teen Pregnancy Prevention (TPP) Program supports the replication of evidence-based programs for adolescents ages 10-24 and their caregivers. Programming focuses on preventing unintended teen pregnancy and sexually transmitted infections (STIs) among adolescents and promoting positive youth development. The program supports meaningful engagement of youth, parents/caregivers, and the community in the design, implementation, and monitoring of the project. It also supports active collaboration with a network of partners to increase awareness of and access to adolescent-friendly health services. The Teen Pregnancy Prevention program is implemented in school settings, juvenile justice systems, out of home care, community-based organizations, and clinics.

Wisconsin Family Planning Only Services is a Medicaid-funded program administered by DHS for persons of childbearing or reproductive age who:

1. Have income that does not exceed 306 percent of the FPL; and
2. Are not enrolled in full benefit coverage through Medicaid or BadgerCare Plus, Wisconsin's health care program for low-income individuals and families.

Family Planning Only Services provides selected family-planning services, including 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 old or older.

F. CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

DCF, DPI, and DHS in partnership with the Wisconsin Coalition Against Sexual Assault (WCASA) and the Department of Justice (DOJ), work cooperatively to prevent statutory rape, other sexual assault, and adolescent pregnancies. These education and training services, in addition to other services, are designed to reach various professions, including state and local law enforcement officials, the education system, and relevant counseling services ranging from prevention to enforcement based on the needs identified by Wisconsin's communities.

Over the years Wisconsin's adolescent sexual assault prevention and adolescent pregnancy prevention services have evolved to a strengths-based focus on promoting well-being, healthy relationships, sexual health, and self-esteem. The scope for these services includes both males and females.

An example of services implemented across Wisconsin Departments includes DPI's collaboration with DHS and DOJ to create and post an electronic publication describing the circumstances under which educators are required to report sexual activity among adolescents as possible child abuse. A second example is DCF's collaboration with DOJ and DHS to update W-2 program policy to comply with state statutes that require use of the legal substitute address assigned to individuals enrolled in the state's address confidentiality program. This program, known as Safe at Home, aims to protect individuals who fear for their safety such as victims of sexual assault.

Comprehensive services across professions include implementation of the Wisconsin Statutes requirement that Child Protective Services (CPS) agencies refer all cases of suspected or threatened child sexual abuse to law enforcement. Local law enforcement agencies and CPS coordinate the planning and execution of the investigation of the report. Any law enforcement agency that determines criminal action is necessary refers the case to the District Attorney for criminal

prosecution. The CPS Access and Initial Assessment Standards describe the statutory requirements and practice guidelines for CPS agencies to enhance collaboration with law enforcement agencies in response to reports of sexual abuse, as well as reports of other forms of child maltreatment. (See the DCF CPS Access and Initial Assessment Standards at:

<https://dcf.wisconsin.gov/files/cwportal/policy/pdf/access-ia-standards.pdf>

G. IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

Wisconsin issues payments via paper check or via Electronic Funds Transfer (direct deposit into participants' bank accounts). In order to prevent access of TANF-funded assistance under any electronic funds transfer in prohibited locations, Wisconsin has: 1) published an operations memo informing its W-2 Agencies of prohibited locations and transactions; 2) included a flyer, available in English, Spanish, or Hmong, as part of the application and eligibility-review processes to ensure that the FEP discusses the information with participants; and 3) mailed a notice October 2014 to all then-current W-2 participants (who would not have received the brochure at intake) informing them of the prohibited locations for using their cash assistance. (See [W-2 Manual Chapter 1.](#))

H. ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

As stated in **(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. There are banks in Wisconsin which charge no fees for basic checking services: Abby Bank, Wisconsin Bank and Trust, Associated Bank, and Ally Bank. (See [W-2 Manual Chapter 10.](#))

I. INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

Wisconsin does not treat families moving into the state from another state differently from other families under the program; however, it does verify the amount of time in the TANF program in the other state to assure compliance with the federal 60-month lifetime time limit on receipt of TANF. (See W-2 Manual Chapter 2.)

J. INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

Wisconsin does not provide assistance under the program to individuals who are not citizens of the United States or are not qualified non-citizens. Eligible individuals who are qualified noncitizens 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 noncitizens. (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. 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 entity disagrees with a Fact Finding decision.

Applicants and participants have the right to request a Fact Finding Review within 45 days of a decision affecting their case. The Fact Finding Review is completed by the W-2 agency's Fact Finder. It is the first level of the dispute resolution if an applicant or participant believes:

1. The denial of an application for JAL or W-2 services was incorrect;
2. The W-2 or JAL application was not acted upon with reasonable promptness;
3. The W-2 placement was inappropriate;
4. The W-2 placement begin date was wrong;
5. The W-2 payment was incorrectly ended, reduced, or subject to an overpayment;
6. The extension to a W-2 24-month placement time limit or 48-month state lifetime limit was incorrectly denied;
7. The denial of a good cause request for noncooperation with child support was incorrect;
8. The W-2 case was incorrectly closed;
9. A Learnfare penalty was incorrectly imposed; and/or
10. The agency's determination of an IPV was incorrect.

A decision will be issued by the Fact Finder within five working days of the Fact Finding

Review taking place, when the participant and agency exchange their evidence. The final decision is mailed to the participant and any action required of the W-2 Agency must be complied with in 10 calendar days. If an individual or the W-2 agency disagrees with the final Fact Finding decision, they may appeal the decision by requesting a Departmental Review. The Wisconsin Department of Administration, Division of Hearings and Appeals will conduct the Departmental Review. W-2 agencies must comply with the Departmental Review decision within 10 calendar days of the decision. (See [W-2 Manual Chapters 12 and 15.](#))

Civil Rights, Affirmative Action, and Complaint Resolution

Each W-2 agency must meet Civil Rights Compliance and Affirmative Action requirements, which include processes for resolution of complaints. Complaints must be filed within one hundred and eighty (180) days for discrimination complaints. Civil rights investigations are to be completed within ninety (90) days of when the complaint is filed. However, investigations may take longer depending upon the need for additional information from the complainant or other parties involved in the complaint.

The Wisconsin Departments and/or their provider agencies administer all of the state programs included in this Plan. These Departments are DCF, DOA, DHS, DPI, and DOR. All of these Departments and their provider agencies are required to meet state and federal Civil Rights

Compliance and Affirmative Action requirements. (See [W-2 Manual Appendix on W-2 Agency Civil Rights Obligation.](#))

L. INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

The W-2 program provides assistance to eligible individuals to train for, seek, and maintain employment that includes providing direct care in a long-term care facility (as terms are defined for the TANF program under section 1397j of Title IV-A of the Social Security Act). The W-2 program's job skills training, work experience, and job retention services provided for TEMP, CSJ, and W-2 T participants often include training and employment services for Certified Nursing Assistants (CNAs), home health aides, and other personal and health care aide positions. The W-2 program's case management services provide ongoing employment retention services for positions that include CNAs, home health aides, and other personal and health care aides.

Additionally, Wisconsin has a program that requires state agencies with 100 or more full-time equivalent positions to annually prepare and implement a plan to hire W-2 participants. State agencies with fewer employees are encouraged to participate in the program as well. A primary goal of the W-2 employment program is to ensure that W-2 customers are enabled to become economically self-sufficient. Together with DCF, the DOA Division of Performance Management provides resources and support to agencies to recruit, assess, certify and retain W-2 participants. W-2 participants are commonly hired for positions related to providing direct care in a long-term care facility, including positions under the following classification titles: nursing assistant, nurse clinician, resident-care technician, and psychiatric-care technician.

DCF will coordinate with DHS's Bureau of Aging and Disability Resources and the Department of Workforce Development (DWD) to plan for and help address Wisconsin's current and ongoing shortage of health care workers for the increasing elder population. The goal of this coordination is to proactively identify geographic movement within Wisconsin of the elder population and the workers who provide health care services, eldercare labor shortage issues, and other eldercare issues. DCF will share this information with W-2 agencies. W-2 agencies are required to keep informed of local economic trends and provide employment services, including job skills training and job development, based on those trends..

M. PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

FFY 2025 TANF Annual Report on State Maintenance-of-Effort Programs Form ACF-204

1. (a) Name of Benefit or Service Program: **W-2 Benefits**
2. Description of the Major Program Benefits, Services, and Activities: **Wisconsin provides cash assistance to W-2 participants who qualify. The maximum monthly benefit amount is \$653.00 or \$608.00. Wisconsin includes Qualified Non-Citizens (a state option) and provides for their benefits and services with 100% state funds.**
3. Purpose(s) of Benefit or Service Program: **TANF Purpose (a): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.**
4. Program Type (Check one)
☒ This Program is operated under the TANF program
☐ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$24,133,870**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$24,133,870**

8. Total Number of Families Served under the Program with MOE funds: **3,890** This last figure represents (check one):

☒ The average monthly total for the fiscal year

☐ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **115% of the federal poverty level**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ☐ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

1. (b) Name of Benefit or Service Program: **Brighter Futures**

2. Description of the Major Program Benefits, Services, and Activities: **Grants are provided to local agencies for the purpose of preventing and reducing the incidence of non-marital pregnancy; youth violence; youth alcohol and other substance use and abuse; child abuse and neglect; and to increase adolescent self-sufficiency by encouraging high school graduation, vocational preparedness, improved social and other interpersonal skills and responsible decision making.**

3. Purpose(s) of Benefit or Service Program: **TANF Purposes (c): 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 (d): Encourage the formation and maintenance of two-parent families.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$711,145**
7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$711,145**

8. Total Number of Families Served under the Program with MOE funds: **5,488**

This last figure represents (check one):

_____ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **Grantees must target service delivery to the most vulnerable populations which include families from the lowest-income neighborhoods of their service-delivery areas. These services also support fatherhood initiatives and two-parent families as a stabilizing force in the lives of children.**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes _____ No ☒

11. Total Program Expenditures in FY 1995: **\$0** (NOTE: provide only if response on question 10 is No)

1. (c) Name of Benefit or Service Program: **Burial Services**
2. Description of the Major Program Benefits, Services, and Activities: **Financial assistance is available to needy families for cemetery, funeral, and burial costs.**
3. Purpose(s) of Benefit or Service Program: **TANF Purpose (a): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

_____ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$349,771**
7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$349,771**
8. Total Number of Families Served under the Program with MOE funds: **242** This last figure represents (check one):

_____ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-FUNDED Program Benefits or Services: **Receiving W-2 benefits and/or services (115% of the federal poverty level) or financially eligible to receive W-2 benefits and/or services.**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes _____ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

1. (d) Name of Benefit or Service Program: **Case Management Follow-Up Plus**

2. Description of the Major Program Benefits, Services, and Activities: **Wisconsin provides a monthly \$50 supplemental payment in addition to case management follow-up services to eligible W-2 participants that obtain unsubsidized employment and meet federal work participation requirements.**

3. Purpose(s) of Benefit or Service Program: TANF Purposes **(a): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; and (b): End the dependence of needy parents on government benefits by promoting job preparation and work.**

4. Program Type (Check one)

_____ This Program is operated under the TANF program

☒ This Program is a Separate State program

5. Description of Work Activities (Complete only if this program is a Separate State program): **Wisconsin expects the W-2 agencies to provide follow-up case management services for a twelve-month period, as long as the participant continues to meet nonfinancial eligibility criteria, to prevent return to W-2 and to ensure employment stability.**

The follow-up case management services may include:

- a. Employment skills training**
- b. Job counseling and support**
- c. Supportive service referrals**

d. Career development

e. Job search assistance

f. Rapid reattachment services

g. ESL classes, if the W-2 agency determines that the course will facilitate the individual's efforts to retain or advance in employment

h. A course of study meeting the standards established under Wis. Stat. s. 115.29(4) for the granting of a declaration of equivalency of high school graduation; or

i. Other remedial education courses

6. Total State Expenditures for the Program for the Fiscal Year: **\$286,350**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$286,350**

8. Total Number of Families Served under the Program with MOE funds: **1,554**

This last figure represents (check one):

_____ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **W-2 Participants who find unsubsidized employment while in W-2 who were previously in a paid placement are eligible for Case Management Followup Services and Case Management Services Follow-up Plus. To be eligible for W-2, participants have passed the W-2 income eligibility test of 115% FPL.**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes _____ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

1. (e) Name of Benefit or Service Program: **Child Support Pass-Through**

2. Description of the Major Program Benefits, Services, and Activities: **Wisconsin provides current W-2 and SSI Caretaker Supplement (CTS) participants with 75% of**

child support collected on their behalf. In determining eligibility for these programs, it disregards child support received. After W-2 or CTS cases close, Wisconsin provides 100% of child support collected to former W-2 and CTS participants.

3. Purpose(s) of Benefit or Service Program: **TANF Purposes (a): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; and (b): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities (Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$1,533,002**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$1,533,002**

8. Total Number of Families Served under the Program with MOE funds: **6,452** This last figure represents (check one):

☐ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **115% of the federal poverty level (FPL)**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ☐ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No) (f) Name of Benefit or Service Program: **Children First**

2. Description of the Major Program Benefits, Services, and Activities: **The Children First program provides grants to local agencies for the purpose of providing support services to unemployed or underemployed noncustodial parents who are behind in their child support payments. Participation in the program requires a court order.**

3. Purpose(s) of Benefit or Service Program: **TANF Purpose (b): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$493,700**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$493,700**

8. Total Number of Families Served under the Program with MOE funds: **617** This last figure represents (check one):

☐ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **No financial resources available to pay child support and unemployed or underemployed**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ☐ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

(g) Name of Benefit or Service Program: **Domestic Violence Services**

2. Description of the Major Program Benefits, Services, and Activities: **Wisconsin provides grants to local domestic violence service providers to assist victims of domestic violence who may have suffered from physical, sexual, economic, emotional, and/or psychological abuse from an intimate partner or family member. Services are provided to adults and children.**

3. Purpose(s) of Benefit or Service Program: **TANF Purpose (a): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities (Complete only if this program is a Separate State program)
6. Total State Expenditures for the Program for the Fiscal Year: **\$10,716,193**
7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$10,716,193**
8. Total Number of Families Served under the Program with MOE funds: **1,189** This last figure represents (check one):
- ___ The average monthly total for the fiscal year
- x** The total served over the fiscal year
9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **300% of the federal poverty level (FPL) and a minor child in the household**
10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)
- Yes **x** No ___
11. Total Program Expenditures in FY 1995:
- (NOTE: provide only if response on question 10 is No)

(h) Name of Benefit or Service Program: **Educational Support Services to Needy Students**

2. Description of the Major Program Benefits, Services, and Activities: **Wisconsin provides a number of services to needy students, pre-K through grade 12, including: reducing class sizes for low-income students; providing more resources for needy students in rural districts; and providing more resources for students in high poverty districts.**

3. Purpose(s) of Benefit or Service Program: **TANF Purpose(s): (a) Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; (b) End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; (c) 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 (d) Encourage the formation and maintenance of two-parent families.**

4. Program Type (Check one)

x This Program is operated under the TANF program

___ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$75,005,722**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$75,005,722**

8. Total Number of Families Served under the Program with MOE funds: **374,558** This last figure represents (check one):

____ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **Eligibility for Federal Free or Reduced-Price Lunch Program**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ____ No ☒

11. Total Program Expenditures in FY 1995: **\$0** (NOTE: provide only if response on question 10 is No)

1. (i) Name of Benefit or Service Program: **Emergency Assistance**

2. Description of the Major Program Benefits, Services, and Activities: **Emergency Assistance is available to needy families if the emergency is due to fire, flood, natural disaster, energy crisis, impending homelessness, or homelessness. Families may be eligible for Emergency Assistance once in a 12-month period.**

3. Purpose(s) of Benefit or Service Program: TANF Purpose (a): **Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program ____ This Program is a Separate State program.

5. Description of Work Activities (Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$8,276,101**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$8,276,101**

8. Total Number of Families Served under the Program with MOE funds: **7,123** This last figure represents (check one):

____ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **115% of the federal poverty level**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ____ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

1. (j) Name of Benefit or Service Program: **Wisconsin Home Energy Assistance Program and Weatherization Assistance Program**

2. Description of the Major Program Benefits, Services, and Activities: **Provides payments to utility companies and other energy suppliers on behalf of needy families, reconnection services, crisis intervention services (e.g. furnace replacements), and weatherization services.**

3. Purpose(s) of Benefit or Service Program: **TANF Purpose (a): Reduce the energy burden and provide crisis services to eligible households, including those with young children.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

____ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$25,069,878**

Total State MOE Expenditures under the Program for the Fiscal Year: **\$25,069,878**

7. Total Number of Families Served under the Program with MOE funds: **70,573** This last figure represents (check one):

____ The average monthly total for the fiscal year

☒ The total served over the fiscal year

8. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **Families with children and under 60% of state median income adjusted for family size**

9. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ____ No **x**

10. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

1. (k) Name of Benefit or Service Program: **Job Access Loans**

2. Description of the Major Program Benefits, Services, and Activities: **Job Access Loans are short-term interest-free loans that are intended to meet immediate and discrete expenses that are related to obtaining employment (e.g., car repairs, driver's license fees, clothing/uniforms)**

3. Purpose(s) of Benefit or Service Program: **TANF Purpose (b): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.**

4. Program Type (Check one)

x This Program is operated under the TANF program

____ This Program is a Separate State program

5. Description of Work Activities (Complete only if this program is a Separate State program):

6. Total State Expenditures for the Program for the Fiscal Year: **\$2,448,015**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$1,525,706**

8. Total Number of Families Served under the Program with MOE funds: **1,468** This last figure represents (check one):

____ The average monthly total for the fiscal year

x The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **115% of the federal poverty level**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ____ No **x**

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

1. (l) Name of Benefit or Service Program: **Kinship Care**
2. Description of the Major Program Benefits, Services, and Activities: **Cash assistance is provided on a monthly basis to the relative caretakers of needy children. Effective January 1, 2020 and January 1, 2021 the maximum payment is \$254.00 per month per child. The expenditure levels provided below include the administrative costs of local assessments.**
3. Purpose(s) of Benefit or Service Program: **TANF Purpose (a): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.**
4. Program Type (Check one)
x This Program is operated under the TANF program
____ This Program is a Separate State program
5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$34,048,023**
7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$34,048,023**
8. Total Number of Families Served under the Program with MOE funds: **4,391** This last figure represents (check one):
x The average monthly total for the fiscal year
____ The total served over the fiscal year
9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **Children removed from their parental homes are considered to have no financial resources**
10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)
Yes ____ No **x**
11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

(m) Name of Benefit or Service Program: **Local W-2 Agencies**

Description of the Major Program Benefits, Services, and Activities: **Local W-2 agencies contract with the state administering agency for eligibility and service delivery of W-2 benefits and support services. The following expenditures include the cost of eligibility determination, local administration, and services provided to participants.**

3. Purpose(s) of Benefit or Service Program: TANF Purposes (a): **Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; and (b): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities (Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$53,568,922**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$53,568,922**

8. Total Number of Families Served under the Program with MOE funds: **5,615** This last figure represents (check one):

☒ The average monthly total for the fiscal year

☐ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **115% of the federal poverty level**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ☐ No ☒

11. Total Program Expenditures in FY 1995: **\$0** (NOTE: provide only if response on question 10 is No)

(n) Name of Benefit or Service Program: **Milwaukee County Substance Use**

Disorder Treatment

2. Description of the Major Program Benefits, Services, and Activities:

Wisconsin contracts with Milwaukee County to provide substance use disorder services to TANF-eligible individuals without financial resources for a wide range of substance use disorder treatment, recovery-support services, parenting classes, and programming that improves daily living skills and supports self-sufficiency. Special population groups for priority of services include pregnant women and W-2 participants.

3. Purpose(s) of Benefit or Service Program: TANF Purposes (a): **Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; (b): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; (c): 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 (d): Encourage the formation and maintenance of two-parent families.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$3,904,454**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$3,904,454**

8. Total Number of Families Served under the Program with MOE funds: **587** This last figure represents (check one)

☐ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **200% of the federal poverty level**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one) Yes ☐ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(o) Name of Benefit or Service Program: **SSI Caretaker Supplement**

Description of the Major Program Benefits, Services, and Activities: **SSI recipients with dependent children are eligible to receive a monthly supplement of \$275.00 for one child and \$165.00 for each additional child.**

3. Purpose(s) of Benefit or Service Program: TANF Purpose (a): **Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$816,008**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$816,008**

8. Total Number of Families Served under the Program with MOE funds: **3,436** This last figure represents (check one):

☒ The average monthly total for the fiscal year

☐ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **Must be receiving SSI**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ☐ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(NOTE: provide only if response on question 10 is No)

(p) Name of Benefit or Service Program: **State Administration**

Description of the Major Program Benefits, Services, and Activities: **State administration includes the state agency costs of administering the W-2 program and related TANF programs, such as Emergency Assistance and Job Access Loans.**

3. Purpose(s) of Benefit or Service Program: TANF Purposes **(a): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; (b): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; (c): 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 (d): Encourage the formation and maintenance of two-parent families.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$2,352,358**

7. Total State MOE Expenditures under the Program for the Fiscal Year:
\$2,352,358

8. Total Number of Families Served under the Program with MOE funds: **6,330** This last figure represents (check one):

☒ The average monthly total for the fiscal year

☐ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **115% - 300% of the federal poverty level**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ☐ No ☒

11. Total Program Expenditures in FY 1995: **\$0**

(q) Name of Benefit or Service Program: **Student Milk and Breakfast Programs**

Description of the Major Program Benefits, Services, and Activities: **Under the Wisconsin "Morning" Milk Program, participating schools provide free milk daily to children of eligible families from pre-K through fifth grade; similarly, participating schools provide free breakfast to children of eligible families from pre-K through fifth grade.**

3. Purpose(s) of Benefit or Service Program: TANF Purposes (a): **Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; and (b), by promoting children's effective learning, the benefit contributes to ending the dependence of needy parents on government benefits by promoting job preparation and work.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

☐ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$ 2,389,987**

7. Total State MOE Expenditures under the Program for the Fiscal Year: **\$ 2,389,987**

8. Total Number of Families Served under the Program with MOE funds: **138,412**

This last figure represents (check one):

☐ The average monthly total for the fiscal year

☒ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **Eligible to receive free and reduced-price lunch program benefits (children from households receiving FoodShare and/or W-2 benefits/services are categorically eligible).**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes ☒ No ☐

(r) Name of Benefit or Service Program: **Wisconsin Shares Child Care Subsidy Program**

2. Description of the Major Program Benefits, Services, and Activities: **Wisconsin supports low-income working families by subsidizing a portion of the cost of quality child care while the parents or caregivers are working or participating in another approved activity.**

3. Purpose(s) of Benefit or Service Program: TANF Purposes (a): **Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; (b): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.**

4. Program Type (Check one)

☒ This Program is operated under the TANF program

_____ This Program is a Separate State program

5. Description of Work Activities

(Complete only if this program is a Separate State program)

6. Total State Expenditures for the Program for the Fiscal Year: **\$15,993,317**

7. Total State MOE Expenditures under the Program for the Fiscal Year:
\$15,993,317

8. Total Number of Families Served under the Program with MOE funds: **19,746**
This last figure represents (check one):

 X The average monthly total for the fiscal year

_____ The total served over the fiscal year

9. Financial Eligibility Criteria for Receiving MOE-funded Program Benefits or Services: **Child care assistance is available to all working families at or below 200 % of the Federal Poverty Level (FPL) at the time of their initial application and at or below 85% of the State Median Income once the family is receiving child care assistance.**

10. Prior Program Authorization: Was this program authorized and allowable under prior law? (check one)

Yes _____ No x

Total Program Expenditures in FY 1995: **\$0** (NOTE: provide only if response on question 10 is No) .

TANF CERTIFICATIONS

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:

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the state will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which state agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and	

The State Plan must include	Include
private sector organizations (section 402(a)(4) of the Social Security Act)—	
3. (A) have been consulted regarding the plan and design of welfare services in the state so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the state and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the state program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the state program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6. (i) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6. (ii) refer such individuals to counseling and supportive services; and	Yes
6. (iii) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence (section 402(a)(7) of the Social Security Act).	Yes
7 Establish and enforce standards and procedures to*—	

The State Plan must include	Include
7. (A) ensure that 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;	Yes
7. (B) ensure that case workers and other agency personnel responsible for administering the state program funded under this part are trained in—	
7. (B) 1. the nature and dynamics of sexual harassment and domestic violence, sexual assault, and stalking;	Yes
7. (B) 2. 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	Yes
7. (B) 3. methods of ascertaining and ensuring the confidentiality of personal information and documentation related to applicants for assistance and their children who have provided notice about their experiences of sexual harassment, domestic violence, sexual assault, or stalking; and	Yes
7. (C) ensure that, if a state has elected to establish and enforce standards and procedures regarding the screening for, and identification of, domestic violence, sexual assault, or stalking pursuant to paragraph (7)—	
7. (C) 1. the state program funded under this part provides information about the options under this part to current and potential beneficiaries; and	Yes
7. (C) 2. case workers and other agency personnel responsible for administering the state programs funded under this part are provided with training regarding state standards and procedures pursuant to paragraph (7).	Yes

EMPLOYMENT AND TRAINING PROGRAMS UNDER THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (PROGRAMS AUTHORIZED UNDER SECTION 6(D)(4) OF THE FOOD AND NUTRITION ACT OF 2008 (7 U.S.C. 2015(D)(4)))

A. GENERAL REQUIREMENTS [27]

The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for

the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:

[27] 7 CFR § 273.7(c)(6)

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;

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 one 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, re-entry populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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, re-entry populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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, re-entry populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 two to four hours per day, two to three times per week, for seven to 12 weeks.

Geographic Area	Target Audience (e.g., homeless, re-entry populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 three months.

Geographic Area	Target Audience (e.g., homeless, re-entry populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 six 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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 four to eight hours per day, four to five days per week for four to 16 weeks.

Geographic Area	Target Audience (e.g., homeless, re-entry populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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 populations, ABAWDS)
Statewide	ABAWDS and non-ABAWDS

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. A DESCRIPTION OF THE CASE MANAGEMENT SERVICES AND MODELS, HOW PARTICIPANTS WILL BE REFERRED TO CASE MANAGEMENT, HOW THE PARTICIPANT'S CASE WILL BE MANAGED, WHO WILL PROVIDE CASE MANAGEMENT SERVICES, AND HOW THE SERVICE PROVIDERS WILL COORDINATE WITH E&T PROVIDERS, THE STATE AGENCY, AND OTHER COMMUNITY RESOURCES, AS APPROPRIATE. THE STATE PLAN SHOULD ALSO DISCUSS HOW THE STATE AGENCY WILL ENSURE E&T PARTICIPANTS ARE PROVIDED WITH TARGETED CASE MANAGEMENT SERVICES THROUGH AN EFFICIENT ADMINISTRATIVE PROCESS;

3. 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;

The Wisconsin Department of Health Service (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
I. Direct Costs:	
a) Salary/Wages	\$0
b) Fringe Benefits* Approved Fringe Benefit Rate Used 43.94 %	\$0
c) Contractual Costs (Admin Only)	\$18,149,518
d) Non-capital Equipment and Supplies	\$0
e) Materials	
f) Travel	\$0
g) Building/Space	\$0
h) Equipment & Other Capital Expenditures	\$0
Total Direct Costs	\$18,149,518
II. Indirect Costs:	
Indirect Costs*Approved Indirect Cost Rate Used: 6.73%	\$0
III. In-kind Contribution	
State in-kind contribution	\$0
Total Administrative Cost (Total of items I, II, and III)	\$18,149,518
100 Percent Federal E&T Grant	
100 Percent Federal Pledge Funding	
50 percent Additional Administrative Expenditure	\$18,149,518

	State cost
IV. Participant Reimbursement (State plus Federal):	
a) Dependent Care (including contractual costs)	\$374,899
b) Transportation & Other Costs (including contractual costs)	\$1,774,121
c) State Agency Cost for Dependent Care Services	\$0
Total 50 percent Participant Reimbursement Expenses	\$2,149,020
V. Total Costs	\$20,298,538

4. 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.

5. 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.

6. THE ESTIMATED NUMBER OF VOLUNTEERS THE STATE AGENCY EXPECTS TO PLACE IN E&T;

8,300

7. 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.

8. 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.

9. 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.

10. 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.

11. 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	• Update
2nd Saturday of the month	• Update • CARES V - and use
Adverse Action	• CWW p - uses it t

12. 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; THE STATE AGENCY MUST

DOCUMENT HOW IT CONSULTED WITH THE STATE WORKFORCE DEVELOPMENT BOARD. IF THE STATE AGENCY CONSULTED WITH PRIVATE EMPLOYERS OR EMPLOYER ORGANIZATIONS IN LIEU OF THE STATE WORKFORCE DEVELOPMENT BOARD, IT MUST DOCUMENT THIS CONSULTATION AND EXPLAIN THE DETERMINATION THAT DOING SO WAS MORE EFFECTIVE OR EFFICIENT. THE STATE AGENCY MUST INCLUDE IN ITS E&T STATE PLAN A DESCRIPTION OF ANY OUTCOMES FROM THE CONSULTATION WITH THE STATE WORKFORCE DEVELOPMENT BOARD OR PRIVATE EMPLOYERS OR EMPLOYER ORGANIZATIONS. THE STATE AGENCY MUST ALSO ADDRESS IN THE E&T STATE PLAN THE EXTENT TO WHICH E&T ACTIVITIES WILL BE CARRIED OUT IN COORDINATION WITH THE ACTIVITIES UNDER TITLE I OF WIOA;

The Wisconsin Department of Health (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.

13. 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.

14. IF A CONCILIATION PROCESS IS PLANNED, THE PROCEDURES THAT WILL BE USED WHEN AN INDIVIDUAL FAILS TO COMPLY WITH AN E&T PROGRAM REQUIREMENT. INCLUDE THE LENGTH OF THE CONCILIATION PERIOD; AND

The conciliation process does not apply to Wisconsin due to the state's voluntary E&T status.

15. 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.

16. 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.

17. 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
Auto insurance	
Auto ownership tag, title, licensing	
Auto purchase	
Auto repairs	
Background checks	
Books	X
Clothing for job interview	X
Clothing required for a job	
Commercial driver's license	
Computers, laptops, etc.	
Course registration fees	X

Item	Almost Always
Dental work	
Dependent care costs	X
Driver license applications and renewal fees	
Drug/alcohol counseling	
Drug tests	
Equipment	
Fines	
Fingerprinting	
Gas	X
Incentives	
Legal services	
Licensing and bonding fees for work or work experience	X
Living expenses and stipends	
Medical expense	
Mental health counseling or treatment	
Relocation expenses	

Item	Almost Always
Safety items (on the job)	X
Student activity fees	
Student loans	
Taxi driver's license	
Test fees	
Temporary housing	
Tools	
Training materials	X
Transportation expenses (gas, bus fare)	X
Tuition and fees	
Uniforms	X
Union dues	
Vision needs (glasses or eye exam)	

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
Unsubsidized employment in 2nd quarter after completion of participation in E&T	E&T Completers, FFY2021

Reporting Measure	Data Source and Time Period
	Q1+Q2+Q3+Q4
Unsubsidized employment in 4th quarter after completion of participation in E&T	

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.

E. OTHER INDICATORS APPROVED BY FNS IN THE E&T STATE PLAN.

N/A

B. ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD) [28]

1. 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:

[28] 7 CFR § 273.7(c)(7)

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; AND

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.

TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above?

Yes

JOBS FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

Components of the Jobs for Veterans State Grants State Plan

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

Wisconsin's JVSG DVOP staff provide Individualized Career Services to veterans with employment barriers, eligible persons, and additional populations. The JVSG staff provide services to eligible veterans through a statewide network of DVOP and LVER staff. 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. The goal of providing these services to eligible veterans and other eligible groups is for the client to overcome employment barriers and obtain employment.

DVOPs conduct outreach and follow-up using a case managed approach. DVOP develop outreach locations that are best serving veterans with employment barriers 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 at the agency location, at the AJC, or virtually. The goal of outreach is to identify those agencies to maximize the number of participants that are referred to the state's workforce delivery system who are both eligible for and benefit from DVOP employment services.

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 persons. Working closely with partner agencies ensures 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 the Wisconsin Department of Veteran Affairs that offers free education through the Universities of Wisconsin and the Wisconsin Technical College System using the Wisconsin GI Bill (state). Referrals 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. Referrals 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. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

Wisconsin JVSG Staff will provide services to veterans designated as having significant barriers to employment and others in accordance with VPL 5-24- In addition, job center staff created

procedures to refer populations to the DVOP, including the use of the state's MIS for developing DVOP eligibility. These populations include:

1. Eligible veterans who have a service connected disability or other disabilities they attest to, Vietnam-era veteran, recently separated veteran, defined in 38 U.S.C. § 4211(6) as a veteran who was discharged or released from active duty within the last three years, has been referred for employment services by a representative of the Department of Veterans Affairs, experiencing homelessness, as defined in Sections 103(a) and (b) of the McKinney Vento Homeless Assistance Act (42 U.S.C. § 11302(a) and (b)), Is justice-involved, as defined in WIOA Section 3(38), 29 U.S.C. § 3102(38) (definition of “offender”), between the ages of 18–24 years of age at the time of enrollment, educationally disadvantaged, meaning that the individual lacks a high school diploma or equivalent certificate, low-income individual in WIOA Section 3(36), 29 U.S.C. § 3102(36), Unemployed, Heads of single-parent households containing at least one dependent child.
2. Eligible person: meet one of the following criteria and who are experiencing at least one qualifying employment barrier defined in policy.
 1. The spouse of any person who died of a service-connected disability
 2. The spouse of any member of the Armed Forces serving on active duty who, at the time of application for assistance under this chapter, is listed, pursuant to section 556 of title 37 and regulations issued thereunder, by the Secretary concerned in one or more of the following categories and has been so listed for a total of more than ninety days: a. missing in action, b. captured in line of duty by a hostile force, or c. forcibly detained or interned in line of duty by a foreign government or power
 3. The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability, or the spouse of a veteran who died while a disability so evaluated was in existence.
3. Additional Populations who are:
 1. Transitioning members of the Armed Forces who have participated in the Transition Assistance Program and have been identified as in need of intensive services.
 2. Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units.
 3. Spouses or other family caregivers of such wounded, ill, or injured members.
 4. DVOP specialists will prioritize service to special disabled veterans, other disabled veterans, and other categories of eligible veterans in accordance with priorities determined by the Secretary of Labor.
4. DVOPs will provide individualized career services to veterans that are referred by the Department of Veterans Affairs Chapter 31 / Veteran Readiness and Employment program (VR&E) as promulgated by VPL 1-26 –(Serving VR&E Participants) and Veteran Affairs/DOLVETS MOU.

The JVSG program may receive referrals from VR&E staff through all VA VR&E Counselors nationwide via the defined state shared mailbox. VR&E staff are responsible for VR&E participants to register on the states MIS system prior to sending referrals to the state mailbox, which will allow for Veterans to be prescreened using the state's MIS system to determine DVOP eligibility or through AJC staff.

In addition to providing Individualized Career Services to Veterans referred by VA VR&E staff, DVOPs may provide Monthly Progress Reports (MPR) to VR&E Counselors when an MPR is included in the VR&E staff referral.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

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 one or more barriers identified by DOLVETs guidance, eligible spouses, and other eligible individuals in accordance with VPL 5-24. 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 or attesting to other disabilities
- Vietnam era Veteran
- Recently separated veteran who was discharged or released from active duty within the last three years.
- Referred for employment services by a representative of the Department of Veterans Affairs.
- 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.
- Is justice-involved
- Is between the ages of 18–24 years of age at the time of enrollment
- Lacks a high school diploma or equivalent certificate
- Meets the definition of a low-income individual in WIOA Section 3(36), 29 U.S.C. § 3102(36).
- Unemployed
- Heads of single-parent households containing at least one dependent child
- Transitioning Service Members (TSM) who, at the time of enrollment have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling.

- Wounded, ill, or injured members of the Armed Forces who are receiving treatment in military treatment facilities or warrior transition units.
- 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 plans (IEP). 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 ensure 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 for employers 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: OVES has added three consolidated positions to the JVSG staff in June 2024. These positions are 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.
- DVOPs and LVERs provide training to AJC staff on subjects such as Veteran Priority of Service and/or screening a veteran for DVOP eligibility.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

OVES LVER, DVOP, and Consolidated (CODL) staff are integrated within the one-stop career center network throughout the State of Wisconsin. LVERs and CODL 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/CODL 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.

DVOP/LVER staff participate in meetings and relay information to the JVSG management team. The JVSG management team arranges/provides training related to the JVSG program to members of the job center staff. DVOPs/CODLs 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. DVOPs and LVERs provide training to AJC staff on subjects such as POS and/or triaging a veteran for DVOP referrals.

JVSG LVER, DVOP, and CODL 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

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

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 Department of Workforce Development (DWD), Division of Employment and Training (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 (WDBs); 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 U.S. 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.

2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE PERCENT INCENTIVE AWARD ALLOCATION;

Award Limitations

Funding may be dispersed per VPL 01-22 and incentive award amounts may change based on each state’s JVSG allocation. For Incentive awarded in 2026, allocation of funds will be dispersed in the follow manner:

- **Total of seven (7) Individual or office cash awards of up to \$3,800 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 career center managers, and will be reviewed by the Veterans program coordinator for appropriateness and to ensure there is no conflict of interest.
- 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 three 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.

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

All performance incentive awards will be cash awards.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

The state does not anticipate any challenges in carrying out an incentive award plan.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

The state does not anticipate any challenges in carrying out an incentive award plan.

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

Wisconsin is proposing the following JVSG performance targets for participants who receive JVSG funded services for Program Years 2026 and 2027:

JVSG Performance Measure	Proposed Levels for PY2026	Proposed Levels for PY2027
Employment Rate 2nd Quarter After Exit	64.0%	64.0%
Employment Rate 4th Quarter After Exit	62.0%	62.0%
Median Earnings 2nd Quarter After Exit	\$9,600	\$9,600

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

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 two years covered by the

plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	74%	TBD	74%	TBD
Employment (Fourth Quarter After Exit)	75%	TBD	75%	TBD
Median Earnings (Second Quarter After Exit)	\$8,400	TBD	\$8,400	TBD
Credential Attainment Rate	65%	TBD	65%	TBD
Measurable Skill Gains	63%	TBD	63%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	79.0%	TBD	79.0%	TBD
Employment (Fourth Quarter After Exit)	77.0%	TBD	77.0%	TBD
Median Earnings (Second Quarter After Exit)	\$10,500	TBD	\$10,500	TBD
Credential Attainment Rate	71.0%	TBD	71.0%	TBD
Measurable Skill Gains	70.0%	TBD	70.0%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	76.0%	TBD	76.0%	TBD
Employment (Fourth Quarter After Exit)	76.0%	TBD	76.0%	TBD
Median Earnings (Second Quarter After Exit)	\$4,800	TBD	\$4,800	TBD
Credential Attainment Rate	61.0%	TBD	61.0%	TBD
Measurable Skill Gains	61.0%	TBD	61.0%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	68.0%	TBD	68.0%	TBD

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Fourth Quarter After Exit)	67.0%	TBD	67.0%	TBD
Median Earnings (Second Quarter After Exit)	\$8,500	TBD	\$8,500	TBD
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

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 two years covered by the plan modification. 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 two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	42.6%	TBD	42.7%	TBD
Employment (Fourth Quarter After Exit)	43%	TBD	43.1%	TBD

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$6,102	TBD	\$6,103	TBD
Credential Attainment Rate	64.2%	TBD	64.3%	TBD
Measurable Skill Gains	51.2%	TBD	51.3%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

The submission of expected levels is the first step in the negotiations process. Once the expected levels of performance have been submitted, State VR programs may begin negotiations with RSA's State Monitoring and Program Improvement Division. Each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers (ESE)

The ESE indicator has been defined in the ESE final rule and PY 2024 was the first year of data for the newly defined performance indicator. However, a minimum of at least two baseline years of data must be collected to support a statistical adjustment model that could produce sufficiently reliable estimates for the purposes of performance negotiations and state performance assessments. The Departments, in accordance with 20 CFR § 677.190(c)(4) and 34 CFR §§ 361.190(c)(4) and 463.190(c)(4), will collect and monitor state ESE performance results for at least PY 2024 and PY 2025 to establish a credible baseline and provide technical assistance. After PY 2025 data are collected the Departments will develop a statistical adjustment model for ESE in accordance with section 116(b)(3)(A)(viii) of WIOA. Since the ESE indicator is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs when feasible. While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	50.0%	TBD	49.5%	TBD
Employment (Fourth Quarter After Exit)	48.5%	TBD	48.4%	TBD
Median Earnings (Second Quarter After Exit)	\$3,437.0	TBD	\$3,200.0	TBD
Credential Attainment Rate	32.5%	TBD	33.0%	TBD
Measurable Skill Gains	62.5%	TBD	62.5%	TBD
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

The submission of expected levels is the first step in the negotiations process. Once the expected levels of performance have been submitted, State VR programs may begin negotiations with RSA's State Monitoring and Program Improvement Division. Each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers (ESE)

The ESE indicator has been defined in the ESE final rule and PY 2024 was the first year of data for the newly defined performance indicator. However, a minimum of at least two baseline years of data must be collected to support a statistical adjustment model that could produce sufficiently reliable estimates for the purposes of performance negotiations and state performance assessments. The Departments, in accordance with 20 CFR § 677.190(c)(4) and 34 CFR §§ 361.190(c)(4) and 463.190(c)(4), will collect and monitor state ESE performance results for at least PY 2024 and PY 2025 to establish a credible baseline and provide technical assistance. After PY 2025 data are collected the Departments will develop a statistical adjustment model for ESE in accordance with section 116(b)(3)(A)(viii) of WIOA. Since the ESE indicator is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs when feasible. While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

ADDITIONAL INDICATORS OF PERFORMANCE

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

OTHER APPENDICES

OPERATIONAL GUIDE TO DEVELOP THE ANNUAL ALLOCATIONS FOR WORKFORCE DEVELOPMENT AREAS

WISCONSIN WIOA Allocation Process

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.

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
Update		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 the affected employees work in, the affected worker count is allocated evenly across all impacted WDAs. If needed to maintain whole numbers for each impacted WDA, affected worker(s) will be added to or subtracted from the affected worker count, whichever least affects the original total count from the notice. Affected workers for which no location information can be obtained (remote workers or otherwise unknown location) are excluded from the formula.

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

Data Required to Calculate Allocations	Contact Name
- Excess Unemployment - Unemployment in ASUs - Unemployment Concentrations	Sheila Ulrich (603)
- Disadvantaged Adults - Disadvantaged Youth	Tom Pethan (603)
Farmer-Rancher Economic Hardship	Tom Pethan (603)
Insured Unemployment	Kinen Fleming (603)

Data Required to Calculate Allocations	Contact Name
Long-Term Unemployment	
Plant Closing and Mass Layoff	Stephanie Elme
Declining Industries	Sara Hoffman (