U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210

FEB 23 2004

The Honorable Jim Doyle
Governor of Wisconsin
Madison, Wisconsin 53702

Dear Governor Doyle:

It is with pleasure that I respond to the State of Wisconsin's request for extension of a Workforce Investment Act (WIA) waiver granted to extend the period of initial eligibility of training providers at 20 CFR 663.530, under the Secretary's authority to waive certain requirements of WIA Title I, subtitles B and E and Sections 8-10 of the Wagner-Peyser Act.

The State of Wisconsin's request for a waiver extension (copy enclosed) indicates that, under the approved waiver, the State developed and implemented a new data collection system. However, the State cites a need for additional time to integrate the Eligible Training Provider List and consumer report card into the new system. The State requests an extension of the waiver through WIA reauthorization. The waiver extension request appears to meet the standard for approval at 20 CFR 661.420(e).

Accordingly, the State of Wisconsin is granted an extension of its waiver to extend the period of initial eligibility of training providers at 20 CFR 663.530 through June 30, 2004. The granted waiver extension is incorporated by reference into the State's WIA Grant Agreement, as provided for under paragraph 3 of the executed Agreement, and also constitutes a modification of the State's approved five-year strategic plan. A copy of the letter should be filed with the State's WIA Grant Agreement and approved five-year plan, as appropriate.

We look forward to helping you achieve better workforce investment outcomes and improve the lives of many Wisconsin residents. Furthermore, we are prepared to entertain other State and local-level waiver requests that the State may wish to submit, consistent with the provisions of WIA and the regulations.

If you have any questions, please don't hesitate to call me at (202) 693-2700.

Sincerely,

Emily Stover DeRocco

Enclosure

Department of Workforce Development
Division of Workforce Solutions
Bureau of Workforce Programs
P.O. Box 7972
Madison, WI 53707-7972
Telephone: (608) 266-5370
Fax: (608) 261-6968
e-mail: dwddws@dwd.state.wi.us

State of Wisconsin
Department of Workforce Development
Jim Doyle, Governor
Roberta Gassman, Secretary
Bettie A. Rodgers, Division Administrator

December 16, 2003

Byron Zuidema, Regional Administrator
Region V, US Department of Labor
230 South Dearborn Street, 6th Floor
Chicago, IL 60604-1505

Dear Mr. Zuidema:

I am writing to request an extension of Wisconsin's Subsequent Eligibility waiver (Control # WI2001-001) until Congress and the President agree on a structure for the Workforce Investment Act (WIA) required State List of Training Programs and Providers. It is our understanding extensions have been granted to other states with similar waivers.

Wisconsin's waiver postpones subsequent eligibility until January 1, 2004. The reasoning behind the original request was to allow more time "to improve WIA performance information and the accountability of training providers" and to increase the number of Individual Training Accounts (ITAs). Given proposed changes in WIA reauthorization, it is not prudent for Wisconsin to continue with its plan to implement subsequent eligibility for ITA programs and training providers beginning January 1, 2004.

The extra time in the waiver allowed Wisconsin to build a foundation to track ITAs and collect data on training programs and providers. At this point in time, it is not clear if the number of ITAs increased. The attached report highlights the status of waiver activities identified in item "D" of the waiver plan.

If you have questions about the status report, please contact Connie Colussy, Director, Bureau of Workforce Programs. Her number is (608) 267-9704.

I look forward to hearing from you at your earliest convenience on our request for the waiver extension.

Sincerely,

Bettie A. Rogers
Division Administrator

Cc: Ron Hunt, AO

Bcc: Sheryl Billups, BWP
Mary Cirilli, BWP
Dianne Reynolds, BWP
BWP Files
DWS Files

Status Report on Activities Identified in Wisconsin's Waiver Plan.

Wisconsin's new data collection system is called ASSET. At the time the waiver was written, GStars was the data system being developed. After several months from when DOL approved the waiver, DWS made the decision GStars would not meet the data needs of WIA including the ITA/ETP system. Technicians in the Department of Workforce Development created ASSET, a hybrid model.

With the switch to a new system, a delay occurred in the original timetable for completing activities identified in the waiver plan. However, Wisconsin still made progress and built a foundation for the ITA/ETP data system and whatever it might look like under re-authorized WIA. The first component of the foundation, ITA tracking, is complete. It began July 1, 2003. The second component, Consumer Report Card, is in the middle stages of being installed. It will include performance results by training provider. It is anticipated this will be functional within the next two months. The third and last component, the State List in ASSET, will be completed by summer 04. As it currently exists, Wisconsin's State List of Eligible Training Programs and Providers is a flat, non-data base file. It is accessible and used by case managers and ITA users through the Department of Workforce Development's web-site.

Following is status of each of the activities identified in item "D." of the waiver plan:

D.1. Conduct workshops and provide technical assistance on ITAs and the State List of Eligible Training Providers, and write a resource guide on Wisconsin's ITA/ETP process. This is a recommendation of the Subsequent Year Workgroup that has been meeting since July. It consists of WDBs, training providers, union, dislocated workers, and Apprenticeship.

> **DWS Response – DWS conducted technical assistance and more is planned for 2004. Once WIA reauthorization is final and the State List is a part of ASSET, a technical assistance guide will be developed.**

> D.1. Bullet – ITA/ETP workshops will be held at the Spring and Fall 2002 WIA Roundtables.

> **DWS Response - Two sessions on the ITA/ETP system were held at the WIA Spring Roundtable on June 4, 2002.**

> D.1. Bullet - An ITA/ETP session will be scheduled for the Governor's Employment and Training Conference in May 2002.

> **DWS Response - The purpose of this session was to showcase the State List in GStars/ASSET. Once the State List becomes a part of ASSET, this will occur at the annual Governor's conference.**

> D.1. Bullet - A specially designed training on the role of case managers in the ITA/ETP process and the techniques to using State List of Eligible Training Providers on GStars will be held in the winter of 2003.

DWS Response - Case Management Training is planned for February 2004. DWS contracted with Kaiser Group to conduct the training. In addition, performance training in ASSET is also planned for the spring of 2004. Initial planning sessions are being held with SPR. Both efforts will include components on ITAs and the State List.

D.1. Bullet - Technical assistance to training providers will be conducted to help them adjust to data collection and reporting requirements. This will begin in Fall 02 and be an ongoing activity.

DWS Response - This activity was postponed until after the ITA/ETP system in re-authorized WIA is final.

D.2. Establish a new ETP site within GStars, the Department's new WIA data gathering system.

DWS Response – The integration of the State List to ASSET will occur in the summer of 04.

D.2.Bullet - It will be an agreed-upon system with WDBs, training providers, DWD, and ITA customers, including being user-friendly for ITA users, case managers, and training providers.

DWS Response - Educating Department/Division/WDB staff on the ITA/ETP system has been an ongoing activity throughout the length of the waiver. This includes a lengthy presentation on May 7, 2002 to the Division's Business Systems Group. In addition, educating and problem solving with all WDB ASSET data users occurs monthly since the summer of 03. ITA/ETP system in ASSET is a focus of the group.

D.2.Bullet - It will encompass expanded functionality.

DWS Response - When the State List is integrated in ASSET, it will be more functional and its accessibility will be enhanced.

D.2.Bullet - Work has begun on its development and will be completed by June 2002.

DWS Response – As stated earlier in this Report, the intent is to have the State List in ASSET by the summer of 04 and available in complete functionality by the time re-authorized WIA is implemented.

D.3. Finalize processes for obtaining All-Student performance information.

D.3.Bullet - Negotiations are under way with the Wisconsin Technical College System Board to identify how All-Student performance information will be obtained for programs listed at each of the campuses. (To be completed by June 30, 2001)

DWS Response - Draft contract language was sent to WTCSB. This was dropped with the new administration's interpretation of FERPA.

D.3.Bullet – Other training providers' All-Student performance information will be studied to determine its relationship to the performance information supplied by Title IV training institutions.

DWS Response – Discontinued when it became apparent this performance information would not be required under re-authorized WIA.

D.4. - Enhance communication to the field on ITA issues.

D.4.Bullet - Conduct quarterly conference calls with ITA contacts in each WDB.

DWS Response - Conference calls with WIA/ITA representatives were held quarterly until the Subsequent Eligibility Work Group began meeting regularly. Some of the same people were involved in both activities, so the conference calls were discontinued. In addition, the WDB ASSET users group meets monthly and deals with similar ITA issues addressed in the quarterly conference calls.

D.4.Bullet - Begin distributing information notices on subsequent year policy issues (March 2002).

DWS Response – DWS distributed all policy recommendations made by the Subsequent Eligibility Work Group to the E & T community for review and comments. Policy recommendations include a policy on sectarian training providers and intensive services versus training.

D.4.Bullet - Develop a marketing campaign to promote ITAs and the new ETP web-site (Begin Summer 2002).

DWS Response - To be completed when re-authorized WIA is final and the State List is integrated in ASSET.

D.4.Bullet - Continue the work of the Subsequent Year workgroup (Ongoing).

DWS Response - The workgroup met several times over a three-year period. In addition to developing policy, they also reviewed and commented on ITA/ETP sessions at the Spring Job Center Roundtable on June 4, 2002 and the subsequent eligibility waiver request. Once the new re-authorized WIA ITA/ETP system is decided on by Congress and the President, this group will be reorganized to address the structure and policy issues of the re-authorized WIA.