

👉 **07hr\_SC-LEUA\_Misc\_pt21e**



👉 July 8, 2008 ... Informational Hearing ... DWD Job Center Consolidation

(FORM UPDATED: 08/11/2010)

## WISCONSIN STATE LEGISLATURE ... PUBLIC HEARING - COMMITTEE RECORDS

### 2007-08

(session year)

### Senate

(Assembly, Senate or Joint)

### Committee on ... Labor, Elections and Urban Affairs (SC-LEUA)

### COMMITTEE NOTICES ...

- Committee Reports ... **CR**
- Executive Sessions ... **ES**
- Public Hearings ... **PH**

### INFORMATION COLLECTED BY COMMITTEE FOR AND AGAINST PROPOSAL

- Appointments ... **Appt** (w/Record of Comm. Proceedings)
- Clearinghouse Rules ... **CRule** (w/Record of Comm. Proceedings)
- Hearing Records ... bills and resolutions (w/Record of Comm. Proceedings)  
(**ab** = Assembly Bill)                      (**ar** = Assembly Resolution)                      (**ajr** = Assembly Joint Resolution)  
(**sb** = Senate Bill)                              (**sr** = Senate Resolution)                              (**sjr** = Senate Joint Resolution)
- Miscellaneous ... **Misc**

\* Contents organized for archiving by: Mike Barman (LRB) (November/2010)

**Jim Doyle**  
Governor

**Roberta Gassman**  
Secretary



**State of Wisconsin**  
**Department of Workforce Development**

**OFFICE OF THE SECRETARY**  
201 East Washington Avenue  
P.O. Box 7946  
Madison, WI 53707-7946  
Telephone: (608) 266-3131  
Fax: (608) 266-1784  
<http://dwd.wisconsin.gov/>  
e-mail: [dwdsec@dwd.state.wi.us](mailto:dwdsec@dwd.state.wi.us)

---

FOR IMMEDIATE RELEASE

Wednesday, July 16, 2008

CONTACT: Howard Cosgrove, Communications Specialist, 608-267-6753

### **STATE JOB SERVICE STAFF WILL STAY IN 22 JOB CENTERS**

MADISON – Job Service and veterans staff will be stationed at two offices in each of the state's 11 workforce development areas, for a total of 22 job center locations, Wisconsin Department of Workforce Development (DWD) Secretary Roberta Gassman announced today. Job centers are operated by regional workforce development boards and usually house multiple agencies offering a variety of services.

Gassman said she made the decision to staff two locations in each Workforce Development region in recognition of community feedback and the need for employment services, and to ensure sufficient geographic coverage for job seekers, veterans, employers and others needing assistance.

"DWD is committed to improving services and saving taxpayer dollars," Secretary Gassman said.

"Mobile state staff will travel throughout the region on an as-needed basis so services can be provided to the entire area."

The consolidation is part of a statewide plan to enhance services for job seekers, including veterans and those with disabilities, and employers, while reducing the overhead costs the state has been paying for rent and operating expenses at 38 job centers. Consolidations are estimated to save approximately \$350,000 per year. Federal employment and training funds, which pay for the services, have been cut by 73 percent between 1984 and 2004 when inflation is considered, according to a new independent analysis by the Public Policy Forum.

"We are making these changes in consultation with local service providers as part of a plan to transform our employment and training services to best meet the needs of Wisconsin's workers and employers in the 21st century," Secretary Gassman said. "Because our shrinking resources have been spread so thin, too little of our funding has been going into actually serving job seekers and employers with skills

assessment, career advising and training. Too much of our capacity has been consumed with overhead costs such as rent, computer lines and publications.”

As part of the state consolidation, Job Service and veterans staff will make regular visits to areas not immediately served by an office in the community. Staff will reach out to customers around the state through a variety of locations including technical colleges, community organizations and libraries. The consolidation will allow staff to reach more communities and more unemployed and underemployed workers.

Part of the money saved will go toward the development of a new virtual job center that will greatly upgrade the capabilities of the state’s current online job website. The virtual job center will offer features such as posting of resumes and job orders; initial screening of job candidates; online personal job search assistance and job interviews; online job fairs, workshops and seminars; and, videoconferencing.

The combination of consolidated offices, mobile staff, flexible office hours and the virtual job center will help all job seekers get connected to all of the assessment, re-training support and placement services they need.

To make sure the improvements are meeting the needs of communities and the public in the most effective and responsive ways possible, DWD will seek input on goals and performance standards from a new statewide Job Center Standards Workgroup and a new Virtual Job Center Advisory Committee. DWD will also create a new electronic newsletter to keep statewide stakeholders and other interested parties informed of planned changes and allow them to offer feedback.

After consolidation, approximately 150 DWD mobile Job Service and veterans staff will be assigned to 22 job centers around the state. The sites were selected based on population, workforce needs, available resources and efficiencies, including the availability of free or low-cost space. Consolidations will occur as leases expire, with most achieved by December 31, 2008.

Job Centers will be staffed by DWD Job Service and veterans personnel in the following 22 locations:

Workforce Development Area 1  
Kenosha  
Racine

Workforce Development Area 2  
NE Milwaukee Job Center  
SE Milwaukee Job Center

Workforce Development Area 3  
Pewaukee  
West Bend

Workforce Development Area 4  
Menasha  
Fond du Lac

Workforce Development Area 5  
Green Bay  
Marinette

Workforce Development Area 6  
Wausau  
Wisconsin Rapids

Workforce Development Area 7  
Superior  
Phillips

Workforce Development Area 8  
Eau Claire  
Rice Lake

Workforce Development Area 9  
La Crosse  
Tomah

Workforce Development Area 10  
Madison  
Jefferson

Workforce Development Area 11  
Janesville  
Fennimore



---

# BOB JAUCH

---

WISCONSIN STATE SENATOR

---

July 17, 2008

Packet

Roberta Gassman, Secretary  
Wisconsin Department of Workforce Development  
201 East Washington Avenue  
P.O. Box 7946  
Madison, WI 53707-7946

Dear Secretary Gassman,

This letter is a follow-up to our conversation yesterday regarding the revised Job Service Center realignment plan. As we discussed, I am pleased that you are working to maintain service coverage in the northern and other rural areas of the state and appreciate as well that you have responded to concerns raised by job service workforce development experts and legislators by revising your original realignment plan.

I spoke with Hector Colon this morning and I understand that the development of virtual job centers will incur additional expenses to the Department, which you intend to offset with the closing of 66 physical job service center locations. As you will note in my attached press release I recognize the inevitable challenge in maintaining essential services with less revenues. However, our mutual objective is to assure that we provide a vital safety net for jobless citizens throughout Wisconsin and there must be careful evaluation of the delivery of these services to assure that these services are not weakened as a result of the new plan.

As I indicated in my press release dated July 16, I am requesting that the Department issue a report six months from now to the legislature on the status of the realignment. In particular, the Legislature will be interested in how jobseekers needs are being met under the new job service model, what limitations to access job seekers may be experiencing, and what expected and unexpected costs or cost savings the Department experiences. It will also be important to know budgetary constraints on the program. Overall Federal budget reductions necessitate a realignment of the delivery system but it will be helpful for the Legislature to understand the budgetary needs as we deliberate the next State budget.

I appreciate your commitment to serving the citizens of Wisconsin, but serving more citizens with less funding is going to create a significant challenge. The Legislature shares your commitment and I believe will be willing to work with you to assure that there is adequate legislative support to assist you in meeting those challenges.

As I expressed in our conversation, I am pleased that you modified your plan to provide greater coverage to the northwest region of the state. These job services are vital to individuals facing job loss in this difficult economy and I look forward to an ongoing dialogue with you about how to meet the needs of these Wisconsin citizens.

Sincerely,

A handwritten signature in black ink that reads "Bob Jauch". The signature is written in a cursive style with a long horizontal line extending to the right.

Bob Jauch  
State Senate

BJ/skb

cc: Senator John Lehman  
Senator Dave Hansen  
Senator Julie Lassa  
Senator Russ Decker  
Senator Pat Kreitlow  
Senator Mark Miller  
Senator Lena Taylor  
Senator Judy Robson  
Senator Kathleen Vinehout



FOR IMMEDIATE RELEASE:  
July 16, 2008

Contact: Sen. Bob Jauch  
608-266-3510

**Senator Jauch: Modified DWD Job Center Realignment Will Require Monitoring**

State Senator Bob Jauch (D-Poplar) acknowledged today that the recently announced modified Department of Workforce Development Job Center staff realignment plan is far better than the original plan, but cautioned that close monitoring needs to be maintained so that the safety net services for job seekers are not weakened.

The new plan doubles the number of centers the Department originally proposed, changing the number of staffed offices from twelve to twenty-two. This includes keeping DWD staff in centers in Superior, Phillips and Rice Lake. Department of Workforce Development Secretary Roberta Gassman's decision to keep staff in offices in Rice Lake and Phillips is made with the understanding that those offices will continue to provide services to citizens in the northwest region.

Jauch said, "I give the Secretary credit for listening to the concerns of job service workforce development experts and legislators in coming up with a thoughtful plan that will still save money, but also provide some assurances that services will be available to all citizens of the state. Neither Secretary Gassman nor I want to spend time reducing Job Center services, but it is a necessary responsibility because the Federal government has reduced funding."

In response to the Department's recently announced job service center consolidation plan, Senator Jauch had joined other legislators in a letter to Secretary Gassman calling for review of the original proposal.

Jauch explained that, "Although the Secretary's revised plan is not perfect, as a manager she cannot spend money she does not have. The Federal resources have begun to dry up and unless they are replenished with State funds the Department simply cannot provide the same services with fewer resources, but any alternative plan must provide assurances for continuity of services."

Jauch warns that as government continues to cut spending, a collapse of many services citizens rely on may be the result. "Our obligation is to assure that the safety net for unemployed workers is maintained and it may be necessary for us to add more resources if the State finds that service needs are not being met. The legislature and the administration need to carefully monitor this plan over the next several months to ensure that it is indeed allowing workforce development staff to provide necessary services to all regions of the state," Jauch concluded. Senator Jauch called upon Secretary Gassman to issue a report to the legislature on how this new plan is responding to the needs of jobseekers within the next six months.

###



Department of Workforce Development  
Office of the Secretary  
201 East Washington Avenue  
P.O. Box 7946  
Madison, WI 53707-7946  
Telephone: (608) 266-3131  
Fax: (608) 266-1784  
e-mail: [dwdsec@dwd.state.wi.us](mailto:dwdsec@dwd.state.wi.us)



State of Wisconsin  
Department of Workforce Development  
Jim Doyle, Governor  
Roberta Gassman, Secretary

---

August 25, 2008

Senator Spencer Coggs  
State Capitol  
Room 123 South  
P.O. Box 7882  
Madison WI 53707-7882

AUG 26 2008

Dear Senator Coggs:

I wanted to let you know that following responses we received at the informational hearing you convened as well as space offers we received from different communities, we have modified our Job Service staff consolidation plan. We believe that these modifications are responsive to the feedback we received at the hearing. Please let me offer some context to why the changes we are making are necessary.

The Department of Workforce Development (DWD) is transforming its employment and training services to best meet the needs of Wisconsin's workers and employers in the 21<sup>st</sup> century. The existing job center system was created almost 25 years ago – before computers and the Internet were commonplace. In addition, federal financial support for Wisconsin's employment and training system has decreased significantly over the last 25 years, at the very same time that these services are more important than ever before. In order to address the needs of workers and employers we want to make sure we deliver services that are comprehensive, technologically advanced, efficient and effective. We want to be a state where every single employer and job seeker, in every community, has access to the resources they need to be successful.

To redirect more funds to assessment, career advising, training and advancement opportunities for workers, by December 31, 2008, we will be stationing our current Job Service and Veterans staff in 22 locations; two sites in each of Wisconsin's 11 regional workforce development regions. Accordingly, Department of Workforce Development Job Service and veterans' staff will be stationed in more communities than those we addressed at the hearing.

Though our staff will now be operating out of 22 locations, they will be mobile throughout the region, having capacity to hold office hours in other locations as needed, including technical colleges, libraries, community organizations and childcare organizations. Persons with disabilities, dislocated workers, rural communities and veterans will continue to be served in the communities in which they reside with our mobile staff.

We will also reach out to employers and job seekers in new ways, including using new technology to create an exciting new statewide virtual job center. This will allow us to reach people across Wisconsin anywhere, anytime, 24 hours a day, 7 days a week. The virtual job center will allow us to provide face-to-face job search assistance through web cameras; conduct online job fairs; host video job interviews; run online workshops and seminars; and, offer career advising.

To make sure these improvements are meeting the needs of communities and the public in the most effective and responsive ways possible, DWD will seek input on goals and performance

standards from a new statewide Job Center Standards Workgroup and a new Virtual Job Center Advisory Committee. DWD will also create a new electronic newsletter to keep statewide stakeholders and other interested parties informed of planned changes and allow them to offer feedback.

All of us in the Department of Workforce Development are committed to doing our best to meet the needs of workers and employers as we make these changes. We are committed to working with our partners to ensure our customers residing across the entire state are provided with quality training and pathways to higher wage work.

I appreciate your leadership on this issue. DWD staff will continue to be available to address any questions that you may have.

Best regards,

A handwritten signature in cursive script that reads "Roberta Gassman" followed by a stylized flourish or initials.

Roberta Gassman  
Secretary





Department of Workforce Development  
Employment and Training Division  
Bureau of Workforce Training  
P.O. Box 7972  
Madison, WI 53707-7972  
Telephone: (608) 266-5370  
Fax: (608) 267-0330  
Email: [dwdet@dwd.state.wi.us](mailto:dwdet@dwd.state.wi.us)



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

---

September 2, 2008

Mr. Richard Best  
Executive Director,  
Workforce Resource, Inc.  
401 Technology Drive, Ste.100  
Menomonie, WI 54751

Dear Mr. Best:

Thank you for your letter following up on the development of the Virtual Job Center (VJC). While I appreciate your position, I would like to make it clear that the Department of Workforce Development (DWD) disagrees with your conclusions.

In your recent letter, you cited text from your July 11, 2008, letter to me and characterized my response as dismissive. I will respond to each of your points as clearly as I can.

*"While we wish to pursue further discussion with DWD regarding the use of [emailjobseeker.com](http://emailjobseeker.com) to enhance Wisconsin's employment and training services, we must insist on the following:*

1. *That the Department of Workforce Development acknowledge that Workforce Resource, Inc. retains exclusive control of any and all utilization of [emailjobseeker.com](http://emailjobseeker.com) content, materials, concepts, components, designs, elements, or structures and,"*

DWD does not dispute that Workforce Resource, Inc. developed [emailjobseeker.com](http://emailjobseeker.com). As far as we can tell, the site is not patented or copyrighted. Numerous websites contain employment-matching components. The concept is not exclusive to [emailjobseeker.com](http://emailjobseeker.com). All this being said, DWD is not using [emailjobseeker.com](http://emailjobseeker.com) for any part of the VJC.

2. *"That from this point forward, Workforce Resource, Inc. be fully consulted by the Department of Workforce Development or an agent thereof, and obtain explicit permission for Workforce Resource, Inc. for any current or future utilization of [emailjobseeker.com](http://emailjobseeker.com), and"*

As stated in my July 17, 2008, letter to you, DWD is not using [emailjobseeker.com](http://emailjobseeker.com) as part of the VJC.

3. *"Regardless of the outcome of a discussion on continued use, that the Department of Workforce Development fully acknowledge all current or past utilization of any [emailjobseeker.com](http://emailjobseeker.com) content, materials, concepts, components, designs, elements or structures."*

To reiterate, DWD is not using [emailjobseeker.com](http://emailjobseeker.com).

*"In closing, we find it ironic that elements of the proposed technological enhancements being cited to support the proposed DWD System Redesign, that we have so vigorously opposed, have been "based" on solutions developed by Workforce Resource, Inc. and appropriated without our permission. We look forward to the rapid initiation of collaborative discussions with the Department of Workforce Development that will facilitate resolution of this matter and result in enhanced services to Wisconsin's Job Seekers and Employers."*

DWD is fully committed to enhanced service to its customers. In fact, an enhanced and free service to all users is our reason for developing the VJC. Your agency attends the bi-weekly VJC Advisory Team meetings, the method by which we are getting feedback on our system's development. Since DWD is not using the Workforce Resource, Inc. product, there is nothing to resolve.

Based on information that you saw on the August 6, 2008, webinar you have insisted on the following:

"1. *Immediate commencement of negotiations on the use of emailjobseekers.com in its current or modified form as the basis for or as an alternative to the course of action pursued by DWD under the VJC or other initiatives.*"

DWD is not using emailjobseeker.com.

"2. *In keeping with the Wisconsin Open Records statutes, full disclosure of, and access to, the budget for the development of the VJC with specific identification of the costs associated with the resume feature. Please include all DWD internal and external consultant and contractor costs.*"

See Attachment A for the overall project budget. Budget detail for the resume feature is not available.

"3. *Expenditure reports that are generated to track costs against budget for the duration of the project.*"

See Attachment B for the available expenditure reporting.

"4. *A formal comparison of costs and benefits of these alternatives conducted and overseen by a neutral party.*"

Not Applicable. DWD has not had a cost and benefit comparisons by a neutral party.

You further state: *"regardless of compatibility, you fail to address your violation of our conditions of use which precludes copying or mirroring product content and features."*

Let me be clear, DWD did not copy or mirror emailjobseeker.com content or features.

You go on to discuss how I gave my personal assurance that emailjobseekers.com would not conflict with any DWD initiative and encouraged you to proceed. At the time, one year ago, that was correct as DWD was investigating America's Job Link Alliance to replace JobNet. You may recall that I was unsure of where that study would take us and encouraged your development. The emailjobseekers.com is not a unique workforce matching system. Other states and Job Centers around the nation and Wisconsin have different job matching systems to meet the labor exchange requirements of the Wagner Peyser Act.

You also expressed concern *"that at a recent DWD information technology meeting, DWD IT staff announced they are now devoting effort to duplicating key features of our TESSA system that we have been developing with your full knowledge and approval for over three years."*

While I was not at the meeting to hear the conversation, I can assure you that DWD is not spending any time or resources on duplication of TESSA. DWD's role with TESSA has been limited to helping you find a host at DOA.

Finally, you conclude that DWD has unbeknown to you *"belated began using scarce resources to duplicate our efforts, appropriate our concepts and undermine our work."*

This is just not true. DWD is not using emailjobseekers.com and does not intend to prevent you from using it. DWD is going forward with development of the statewide VJC. This system will provide a comprehensive menu of service to employers and jobseekers at no cost. It will be a tool to provide a state labor exchange as required under the Wagner Peyser Act and to enhance services to employers and job seekers.

I hope this clarifies DWD's position concerning emailjobseekers.com. Please feel free to contact me again if you would like updated information in the months to come.

Sincerely,



Gary Denis  
Director  
Bureau of Workforce Training  
(608) 267-9704

Attachments

cc: Secretary Roberta Gassman  
Ron Danowski  
Members – Senate Committee on Labor, Elections and Urban Affairs  
Members – West Central Wisconsin Legislative Delegation  
Linda Clark – Workforce Development Board Chair  
Colleen Bates – Chief Elected Official  
Paul Gordon – Chair, Workforce Resource, Inc.

## High Level Estimate for Virtual Job Center: 2<sup>nd</sup> Generation

### Schedule of Releases

The projected schedule and time frames being estimated are as follows:

Release 1: (June 1, 2008 – Sept 15, 08; 15 weeks) **High level** requirements identified.  
Release 2: (Sept 16, 2008 – Dec 31, 08; 15 weeks) **Very high level** functions identified.  
Following Releases: (Jan 1, 2009 – Jun 30, 2010; 78 weeks) **General** functionality discussed.

### Staffing Assumptions

This estimate assumes the following staffing plan and associated hours. Hours estimates are based on 32.5 billable hours per week (average) per FTE.

Release 1 begins with 4 FTE for two weeks, increases to 5 for another seven weeks, then to 8 for the last six weeks of this release.

Release 2 assumes maintaining the staff level at 8 for the entire release.

Following Releases assumes maintaining the staff level at 8 for the balance of the project.

### SLA Hours Estimate

Release 1:	91 FTE weeks at 32.5 h/week	2,958 hours
Release 2:	120 FTE weeks at 32.5 h/week	3,900 hours
Following:	624 FTE weeks at 32.5 h/week	20,280 hours

Total estimated hours = 27,138

Last Refresh: 8/27/08

## Expenditures For Reporting Category 162A - FICR share VJC

Organization: 7011 OFC OF THE SECRETARY

Sort Order	Object Rollup	OSO Code	OSO Name	200901	200902	Totals
				JULY	AUGUST	
416	Misc Services	3300	MISCELLANEOUS SERVICES	\$5,700.00	\$5,900.00	\$11,600.00
416			Object Rollup Totals	\$5,700.00	\$5,900.00	\$11,600.00
417	IT Equip Purchase	3730	COMPUTER SOFTWARE	\$0.00	\$199.90	\$199.90
417			Object Rollup Totals	\$0.00	\$199.90	\$199.90
419	IT Services - OutSrc	2650	IT SERVICES -PRIVATE COMPANIES	\$0.00	\$700.00	\$700.00
419			Object Rollup Totals	\$0.00	\$700.00	\$700.00
427	PR-S Prof Services	2740	PROFESSIONAL SERVICES-GENERAL	\$1,642.67	\$3,509.92	\$5,152.59
427			Object Rollup Totals	\$1,642.67	\$3,509.92	\$5,152.59
428	PR-S Apps Dev	2650	IT SERVICES -PRIVATE COMPANIES	\$24,389.75	\$16,901.50	\$41,291.25
	PR-S Apps Dev	2740	PROFESSIONAL SERVICES-GENERAL	\$33,392.36	\$17,627.87	\$51,020.23
428			Object Rollup Totals	\$57,782.11	\$34,529.37	\$92,311.48
			Grand Totals	\$65,124.78	\$44,839.19	\$109,963.97



**Linda Vegoe**  
Chair

**Rob Buettner**  
Vice Chair

**Ashley Marshall**  
Secretary/Treasurer

Date?

**WRC**

Wisconsin Rehabilitation Council

201 E. Washington Ave  
P.O. Box 7852  
Madison, WI 53707  
(608) 261-0090  
FAX: (608) 266-1133  
[www.dwd.state.wi.us/dvr/wrc](http://www.dwd.state.wi.us/dvr/wrc)

My name is Linda Vegoe from Oshkosh, Wisconsin. I am chairperson for the Wisconsin Rehabilitation Council and the director of the Client Assistance Program. I want to thank you for the opportunity to offer public comment on behalf of the council and CAP.

The Rehabilitation Council monitors the performance of the DVR, the Vocational Rehabilitation agency, which is housed in Job Centers around our state.

The Client Assistance Program assists people who have complaints or questions about DVR, Vocational Rehabilitation services. In my role as director of that program, I talk to approximately 2,000 DVR clients each year.

Both our council and the Client Assistance Program are very pleased with the Department of Workforce Development decision to consolidate the physical locations of Job Centers while expanding the availability and access to the people who provide the service.

People with disabilities, veterans, unemployed people, and underemployed people have one thing in common, skepticism about government services, including job services. Is it worth my time and gas money to travel there? How will I know who to talk to?

When DVR was moved from regional offices into Job Center locations, there was a concern that people with disabilities would be hesitant to come to a Job Center. DVR started meeting with people in the community to help put a face to the name DVR.

Over the years, public comment to our council has shared appreciation for this approach. Parents and students with disabilities have shared how the DVR counselor's presence at the high school made future visits to the Job Center much easier.

We have also received public feedback that staff training and mentoring can suffer when workers are spread too thin. The recommendations we heard are remarkably similar to what the department is proposing: central locations to house and train staff, but let those staff meet with people in the community.

As Client Assistance Program, I've heard from individuals who appreciate DVR's "in the community" approach.

A woman with a profound hearing loss expressed appreciation that she could meet with DVR in a quiet room at the Clintonville library.

A man with traumatic brain injury commented on how nice it was his DVR person was "willing" to meet with him at Options (an Independent Living Center on the far west side of Green Bay) instead of him having to find his way around downtown.

The majority of farmers I talk to appreciate the fact that DVR counselors come to the farm to see what they need to do and how the disability is interfering with what they need to do. As one farmer put it, "I can show them better than I can tell them."

A disabled business owner in Milwaukee recently commented, "I appreciate that Michael came to my business to meet with me instead of me closing my doors for a couple hours."

As you can tell, I am an enthusiastic supporter of the Regional Career and Skill Center concept. It addresses the fiscal reality by reducing bricks and mortar instead of services to people. When it comes to helping people find employment and helping an employer find qualified staff, you don't need a building, you need a place to meet.



Date?

To: Whom It May Concern:

Re: Testimony for the Record on behalf of the Department of Workforce Development

I am Phyllis Wilhelm, Chair-elect of the Workforce Development Board of South Central Wisconsin (WDBSCW). As Director of Economic Development, Madison Gas & Electric, I have been a business sector representative on the WDBSCW Board and a member of the Executive Committee since WDBSCW was established. Based on my professional and community involvement, I am keenly aware of the challenges we face as a region and State in providing employment and training opportunities for the constituents we serve while ensuring we have a competitive workforce for our economic future.

After the enactment of the Workforce Investment Act, I was involved in the process of revising the established workforce model and forging partnerships to create a regional workforce development organization and Job Center system. Change was not easy but commitment to the goal of creating a better system led to new collaborations and positive results. Throughout the years we've been called on to modify our programs to meet changing needs, take advantage of new sources of funding or to respond to cuts to our budget.

Flexibility and innovation are hallmarks of an effective organization. We must continually scan the environment to identify opportunities to be more effective and efficient in delivery of services and be prepared to adapt and change as situations warrant or legislative mandates require. While the traditional Job Center model served us well in the past, the future looks quite different. Clearly, current fiscal, demographic and economic trends threaten our ability to meet the demands and deliver quality services going forward unless we make changes to the model.

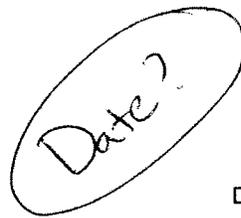
We have anticipated the impact of shrinking federal dollars and have been engaged in a strategic planning process for about sixteen months to realign our resources. In preparing for the future, we are using technology to increase efficiencies and better serve the needs of our clients, both job seekers and employers. Advances in technology provide opportunities to reduce our overhead costs while offering new strategies to serve our clients without compromising program services quality or accessibility.

The changes proposed by the Department of Workforce Development are beneficial and totally aligned with what we are doing. For these reasons, I strongly support the proposed changes to Wisconsin's Employment and Training services. This reorganization will help us continue building a network of partners and aligning efforts focused on engaging individuals to participate in the economy of the future and developing the skilled workforce necessary to expand the competitiveness of area employers. Through these efforts and partnerships we will build a strong regional economy.

Thank you for your support.

Phyllis Wilhelm  
Chair-elect, Workforce Development Board of South Central Wisconsin  
Director of Economic Development, Madison Gas & Electric





---

## UPCOMING IMPROVEMENTS TO WISCONSIN'S EMPLOYMENT & TRAINING SERVICES

- The Department of Workforce Development (DWD) is transforming its employment and training services to best meet the needs of Wisconsin's workers and employers in the 21<sup>st</sup> century.
- The existing job center system was created almost 25 years ago – before computers and the Internet were commonplace.
- Federal financial support for Wisconsin's employment and training system has decreased 73% since 1985 according to a new analysis done by the Public Policy Forum– at the very same time that these services are more important than ever before.
- We must do things differently, using our precious resources to best deliver workforce services to employers and job seekers. We want to be a state where every single employer and job seeker, in every community, has access to the resources they need to be successful.
- We look to being a national leader in ensuring a workforce system that is comprehensive, technologically advanced, effective and efficient.
- By December 31, 2008, we will be redirecting Job Service and Veterans staff to 12 strategic regional hubs across the state in the following locations: Kenosha; two in Milwaukee, given its size; Pewaukee; Menasha; Green Bay; Wausau; Superior; Eau Claire; La Crosse; Madison; and, Janesville. The sites were selected based on population, workforce needs, available resources and efficiencies.
- Though our staff will operate out of 12 home office hubs, they will be mobile throughout the region, having the capacity to hold office hours in other locations as needed.
- Persons with disabilities, veterans, and dislocated workers will continue to be served in the communities in which they reside with our mobile staff.
- DWD will not close any job centers. Regional workforce development boards are responsible for the designation of job centers and their management locally. The state is only one of many service providers in job centers.
- There will be no position cuts because of this effort.
- In addition to reassigning DWD's staff to twelve job center sites, DWD is also creating a statewide career and skill center advisory group to assist with collaboratively establishing new program improvements and service standards.
- DWD will also hold regional meetings to gain additional input on developing program improvements including siting and scheduling office hours at a variety of locations and organizations.

## DWD WILL CREATE A VIRTUAL JOB CENTER

- We will reach out to employers and job seekers in new ways, including using new technology to create an exciting new statewide virtual job center.
- This will allow us to reach people across Wisconsin anywhere, anytime, 24 hours a day, 7 days a week.
- The virtual job center will allow us to provide face-to-face job search assistance through web cameras; conduct online job fairs; host video job interviews; run online workshops and seminars; and, offer career advising.
- DWD has created a statewide virtual job center advisory group to assist the department in developing the new technology.

## BENEFITS TO JOB SEEKERS

- We will be able to redirect overhead savings that would have been otherwise spent on rent and IT to career advising, training and career advancement for workers.
- We will aggressively reach out to our customers and special populations wherever they may be, including technical colleges, libraries, community organizations, childcare centers, etc. Our staff will be mobile instead of only being physically located in job center buildings.
- We will provide improved tools for assessment and referrals to jobs.
- We will focus on enrolling our customers in training and pathways to higher wage work.

**BENEFITS TO EMPLOYERS**

- We will reach out to employers more aggressively to establish strong relationships to meet their workforce needs.
- We will do a better job of matching qualified job seekers to employers.
- We will become a bridge, connecting individuals to technical college and other training to best meet employer needs.

**WISCONSIN NEEDS TO BE MORE EFFECTIVE AND EFFICIENT IN REACHING MORE PEOPLE WHO HAVE EMPLOYMENT AND TRAINING NEEDS**

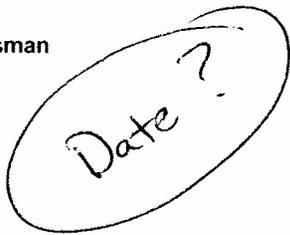
- Best estimates show that current job centers in Wisconsin serve approximately 106,000 citizens annually.
- According to a recent UW-Madison Center on Wisconsin Strategy (COWS) study, an estimated 700,000 Wisconsin low-wage workers lack either a high school diploma or the skills needed beyond a high school diploma to compete in today's job market.
- Approximately 15% of those needing advanced skills beyond a high school diploma are being served in our job centers.

July 8, 2008



**Jim Doyle**  
Governor

**Roberta Gassman**  
Secretary



**State of Wisconsin**  
**Department of Workforce Development**

**OFFICE OF THE SECRETARY**  
201 East Washington Avenue  
P.O. Box 7946  
Madison, WI 53707-7946  
Telephone: (608) 266-3131  
Fax: (608) 266-1784  
<http://dwd.wisconsin.gov/>  
e-mail: [dwdsec@dwd.state.wi.us](mailto:dwdsec@dwd.state.wi.us)

## **Deploying Job Service Staff to Meet Needs of 21<sup>st</sup> Century Economy**

### **Secretary Roberta Gassman Wisconsin Department of Workforce Development**

Governor Jim Doyle recently announced that nearly one million job openings are anticipated in Wisconsin by 2016. Occupations with good wages, career opportunities and unmet employer need include nursing, carpentry, welding and many more. We must do all that we can to connect job seekers to skills and employers to skilled workers now and in the years ahead. That's the challenge we face with our local partners in workforce development, and we all win when we work together to make the best use of existing resources.

The current job center system was created almost 25 years ago, before computers and the Internet were commonplace. In today's high-tech, fast-paced, global economy, the Department of Workforce Development must transform its employment and training services to best meet the needs of Wisconsin's workers and employers in the 21<sup>st</sup> century. In the months ahead, DWD will take steps to meet the needs of job seekers and employers, given the dramatic changes that have occurred since the job center system began.

DWD will deploy its Job Service and veterans staff in strategic locations as a first step to improving services. Staff will be assigned to 22 locations, two sites in each of Wisconsin's 11 regional workforce development regions. From these sites, our mobile staff will circulate throughout their regions, taking a more pro-active approach. They will go where they are needed, whether to community centers, libraries or technical colleges, serving more communities than those where local job centers currently exist.

Our efforts to reach out to jobseekers and employers in every community, from small to large and rural to urban, will be enhanced significantly through technology. As a second step, at DWD and in collaboration with our statewide workforce development partners, we are developing service improvements and an innovative, easy-to-use virtual job center with access statewide, 24 hours a day, 7 days a week. Jobseekers will be able to post resumes and get online job search assistance. Employers will be able to post job openings, screen candidates and conduct interviews. We will launch in September, and eventually we will provide video conferences and workshops for job seekers over the Internet.

The combination of 22 strategically located offices, mobile staff, flexible office hours and a new virtual job center will improve services to job seekers, including veterans and the disabled, as well as to employers.

As we make these changes, it is important to note that DWD is not closing any local job centers. Job centers are run by regional workforce development boards and usually include several partner agencies. DWD's changes will result in a stronger, more comprehensive effort.

In deploying staff, DWD will free approximately \$350,000 now spent on rent and overhead costs, to improve services. We must continually search for innovative ways to become more efficient as federal funds that pay for employment and training services continue to decline, having fallen 13 percent in the past three years.

As it stands now, our shrinking federal resources have been spread so thin that too little state support has been going into actually serving jobseekers and employers with skills assessment, career advising and training. Our limited funds have been consumed with overhead such as rent and computer lines.

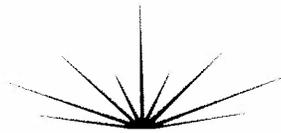
Our goal is for every single job seeker and employer to have access to the resources they need to succeed. Working together, we will continue to grow Wisconsin's economy and develop our skilled workforce. Working together, we all win.

###



Packet

Date ?



Richard Best  
Executive Director

WORKFORCE RESOURCE  
West Central Wisconsin  
Workforce Development Board Inc.

Phone: 715.232.7380 Ext. 105  
or 1.800.472.5522  
Fax: 715.232.2240  
Cell: 715.556.3375

401 Technology Drive E., Suite 100  
Menomonie, WI 54751-2383  
e-mail: bestd@workforceresource.org



## West Central Wisconsin Workforce Development Board Inc.

401 Technology Drive East, Suite 100, Menomonie, WI 54751-2383 • Phone: 715.232.1412 • Fax: 715.232.2240

### Members of the Committee

Thank you for the opportunity to address this morning on a matter of great importance – the future of workforce services in Wisconsin. My name is Richard Best. I am the Executive Director of Workforce Resource, and the West Central Wisconsin Workforce Development Board. I am a lifelong Wisconsin resident employed in the field of Workforce Development and Vocational Rehabilitation my entire professional life, extending back to 1971.

During those 37 years, I have assessed the vocational capacity and developed vocational rehabilitation plans for hundreds of severely disabled individuals, provided vocational counseling in the homes of some of our most disadvantaged citizens, organized work crews of ex-offenders and recovering alcoholics, put dislocated workers back to work and provided thousands of youth with their first job experiences. I have initiated successful welfare-to-work and W2 programs and brought in several millions of dollars in funding to support our regional Job Center system.

I have held my current position as Director of a non-profit, regional Workforce



## West Central Wisconsin Workforce Development Board Inc.

401 Technology Drive East, Suite 100, Menomonie, WI 54751-2383 • Phone: 715.232.1412 • Fax: 715.232.2240

### Members of the Committee

Thank you for the opportunity to address this morning on a matter of great importance – the future of workforce services in Wisconsin. My name is Richard Best. I am the Executive Director of Workforce Resource, and the West Central Wisconsin Workforce Development Board. I am a lifelong Wisconsin resident employed in the field of Workforce Development and Vocational Rehabilitation my entire professional life, extending back to 1971.

During those 37 years, I have assessed the vocational capacity and developed vocational rehabilitation plans for hundreds of severely disabled individuals, provided vocational counseling in the homes of some of our most disadvantaged citizens, organized work crews of ex-offenders and recovering alcoholics, put dislocated workers back to work and provided thousands of youth with their first job experiences. I have initiated successful welfare-to-work and W2 programs and brought in several millions of dollars in funding to support our regional Job Center system.

I have held my current position as Director of a non-profit, regional Workforce Development Organization since 1983. During that tenure, the West Central region can lay claim to being one of, if not the, best performing of Wisconsin's Workforce Development Areas, consistently exceeding state and federal performance measures and meeting all fiscal and programmatic accountability measures. As a passionate advocate for the employment needs of our those most in need and for the small businesses that form the economic underpinning of our communities I feel compelled to bring these concerns to your attention.

I am here to present information that I hope will bring about a change in policy that I sincerely believe will be detrimental to the well-being of the residents of Wisconsin and most particularly, West Central Wisconsin. The initiative in question, variously entitled the Department of Workforce Development System Redesign and Improvements to Wisconsin Employment and Training System, involves the redeployment of employees of Wisconsin's Job Service and Vocational Rehabilitation Divisions from their current Job Center locations into 12 Skill and Career Centers. The stated rationale for this action is the desire to preserve staff capacity by reducing infrastructure cost.

It is my considered opinion, that this proposed design will, instead of improving services, increasing capacity and reducing costs; will reduce access to services and limit capacity with no guarantee of actual cost savings. The most detrimental impacts of this policy direction will be felt in our rural communities by those most in need of the assistance from the public workforce system.

The Department's initiative proposes to relocate state staff from more rural areas, concentrate them in urban centers and then send them back out to rural locations. Job Service and DVR staff will incur extreme personal expense to reach their new locations and then the state will incur extensive travel costs to send them back out to the locations where they came from. In addition to the cost of travel there will be considerable loss of productivity during these extended travel time. Even though the proposal indicates there will be no resulting reduction of staff positions, it is reported that at least 12 staff have already chosen retirement or resignation rather than accept these reassignments. More such resignations are anticipated as more transfers are initiated. Many staff are accepting these transfers because they have little choice. They are not eligible for retirement, cannot afford to resign and are dependent on the state for health insurance.

State abandonment of current space obligations does not necessarily mean reduction in cost for the workforce system. DWD is proposing to abandon space that was acquired on their behalf and shift costs to other partners resulting in the loss of program capacity. In some of the "Hub" locations, there is insufficient space to house the staff being relocated, thus requiring additional space to be acquired and cost to be incurred. In other "Hub" locations the state has excess space and is choosing to abandon occupied space in more rural settings rather than reduce excess space in those urban locations.

In the case of West Central Wisconsin, DWD is abandoning space that was obtained and committed to on behalf of the Department. The Department has stalled the signing of leases and now contends because of these delays that they have no legal obligation for space they requested and committed to through 2009, 10 and 11. If allowed to renege on these obligations \$180,000 to \$250,000 of employment and training assistance funds will need to be diverted to cover these infrastructure costs.

It is difficult accept claims of cost savings without a complete accounting of the actual increased travel costs, cost shifts, losses of productivity, staff position losses and reduced staff morale.

Wisconsin is the birthplace of the One-Stop Career Center movement and Wisconsin's Job Centers were once the envy of the nation. The partnership of Local Elected Officials and Workforce Development Boards, comprised of a majority of business members, are legislatively charged with providing strategic direction, oversight and policy governance for the Workforce system. These volunteers give untold hours of their time to provide their professional insights on the workforce needs of their regions, industries and the general economy. To assure regional collaboration, these boards also include representation of all Job Center partner organizations, education entities, organized labor, economic development and community based organizations.

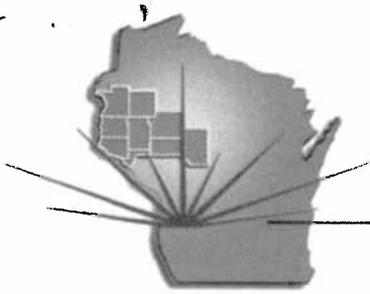
The Workforce Boards were not effectively consulted in the development of this policy. Therefore this policy lacks appropriate responsiveness to local economic, business and workforce conditions. It fails to take into consideration the impact on other organizations and most importantly the needs of customers in need of system services. By failing to properly consult with these Boards and Local Officials, the stability of the regional

workforce system has been placed in jeopardy. Board members have been marginalized, partner organizations may face additional expense and may, themselves, question the worth of continued commitment to the One-Stop Job Center concept.

Accurate baseline data from which to measure progress has not been provided. Effectiveness measures, against which, success can be judged have not been provided. Alternatives have not been sought or given due consideration.

**Therefore, we ask that the proposed redeployment and service site consolidation process be vacated or held in abeyance until, at least until December 31, 2008 to allow for further analysis and development of locally responsive alternatives which will:**

1. Actively engage the Wisconsin's Workforce Development Boards, Local Elected Officials and Workforce Development Professionals in their legitimate Workforce Policy Development roles.
2. Collaboratively establish clear budgetary and service level base-line data from which the success of any chosen strategy can be measured.
3. Collaboratively develop clear goals and outcome measures to be achieved by any chosen strategy
4. Result in collaborative outcome driven strategies responsive to state and local needs.
5. Include strict measures of accountability and collaboratively developed evaluation processes.
6. Reduce facilities and infrastructure costs where feasible while honoring all remaining financial obligations for facilities acquired on behalf of the Department.



**West Central Wisconsin  
Workforce Development Board Inc.**

401 Technology Drive East, Suite 100, Menomonie, WI 54751-2383 • Phone: 715.232.1412 • Fax: 715.232.2240

July 1, 2008

Roberta Gassman, Secretary  
Department of Workforce Development  
201 East Washington Avenue  
P.O. Box 7946  
Madison, WI 53707-7946

Dear Secretary Gassman

We hereby formally request that you vacate or significantly alter your policy direction issued under a May 8, 2008 cover entitled "Workforce Redesign and Improvements" and reissued on June 5, 2008 under the title "Upcoming Improvements to Wisconsin's Employment and Training Services". The central concept of this proposal being the reassignment of Job Service staff from their current locations to 12 urban sites, and the redeployment of Vocational Rehabilitation personnel to these sites and additional as yet to be determined contact point locations.

It is our considered opinion, for the reasons stated here and in the attached documents, this proposal is not in the best interests of the job seekers, workers and employers of Wisconsin. We challenge the proposal's premises that services will be improved and cost savings will be realized. We are particularly concerned about the cost and service implications for West Central Wisconsin as noted in Attachment II.

The proposal in its current form lacks appropriate base-line measures, budgetary and service targets and evaluative criteria to assure accountability. The process from which it evolved failed to engage the legitimate regional Workforce Development Board governance structures and has the potential to totally destabilize the current workforce development system in Wisconsin. Furthermore this proposal calls for reneging on space and other facilities obligations in several locations within West Central Wisconsin that, if upheld, will result in considerable expense that can only come from reductions in local WIA training and service capacity.

Please review Attachment I, particularly the recommendations on pages one and two. We ask that you vacate or hold your decision in abeyance until at least December 31, 2008, to allow time for appropriate benchmarks, goals and evaluative methods to be put in place. Allow local governance structures to craft acceptable strategies to attain those goals and work with regional efforts in a collaborative manner.

We also ask that the Department honor its financial commitments for space as outlined in Attachment II. We have relied upon these commitments from DWD to our detriment and

Secretary Gassman

July 1, 2008

Page 2

we ask that you intercede to rectify these matters. Contrary to assertions that we have refused to sign subleases offered to us, these subleases have not been presented to us and are currently in the possession of the Department of Administration (DOA). DOA assumed sublease responsibility after rejecting subleases that we tendered for signature. DOA refuses to release these sublease documents citing instructions from DWD as rationale. We have repeatedly requested these documents be presented for signature.

We also ask that you review and allow implementation of the Alternative Proposal for West Central Wisconsin outlined in Attachment III to this document. We believe it is a superior approach for addressing the needs of the residents of West Central Wisconsin, which will honor the space commitments made by DWD and result in a more harmonious state-local relationship.

We hope that this appeal will result in altering this proposed course of action and allow for true local input, resulting better performance, greater accountability and a more harmonious state-local relationship. Because of the rapidity of implementation of this plan, The immediate impacts being felt within the region, the lack of response to local input and the severe ramifications on local operations we have reluctantly chosen to seek relief both within and outside of the Department.

Respectfully

The Executive Council on Behalf of  
The West Central Wisconsin  
Workforce Development Area

Linda Clark, Chair  
West Central Wisconsin  
Workforce Development Board

Colleen Bates  
Chief Elected Official  
West Central Wisconsin  
County Boards' Consortium

Paul Gordon, Chair  
Workforce Resource, Inc.

Richard Best  
Executive Director  
Workforce Resource, Inc.



## West Central Wisconsin Workforce Development Board Inc.

401 Technology Drive East, Suite 100, Menomonie, WI 54751-2383 • Phone: 715.232.1412 • Fax: 715.232.2240

July 1, 2008

To the Governor, the State Senate, the State Assembly, Local Government Officials, Workforce Development Board Members, Workforce Development Professional and concerned citizens

Please consider the attached commentary and the request for intervention as an appeal from representatives of the West Central Wisconsin Workforce Development Board, County Boards Consortium and Workforce Resource Board delay or vacate implementation of the recently announced proposal of the Department of Workforce Development to consolidate services from 38 current Job Center sites into 12 urban locations.

It is our considered opinion that this proposal is not in the best interests of the job seekers, workers and employers of Wisconsin. The proposal in its current form lacks appropriate baseline measures, budgetary and service targets and evaluative criteria to assure accountability. The process from which it evolved failed to engage the legitimate Workforce Development Governance structures in local regions and has the potential to totally destabilize the current workforce development system in Wisconsin.

Please review the information in the attachments and support the recommendations included on page one of Attachment I. Ask Workforce Development Secretary, Roberta Gassman, to vacate this decision or hold its implementation in abeyance until at least December 31, 2008. Require that appropriate goals and measures of accountability be put in place prior to implementation of any strategy. Empower local Workforce Development Boards and their Local Elected Official partners to assume their legitimate roles in analyzing local needs and crafting strategies to address those needs through means that will maximize resource effectiveness. Hold responsible parties accountable for success.

Thank you for your consideration of this request and we look forward to assisting Wisconsin to meet its essential Workforce Development needs.

On behalf of the West Central Wisconsin Workforce Development Area

Linda Clark, Chair  
West Central Wisconsin  
Workforce Development Board

Paul Gordon, Chair  
Workforce Resource, Inc.

Colleen Bates  
Chief Elected Official  
West Central Wisconsin  
County Boards' Consortium

Richard Best  
Executive Director  
Workforce Resource, Inc.

## Attachment I

### An Alternative View of "Improvements to Wisconsin's Employment and Training Services"

Wisconsin's demographic trends, job growth projections and replacement worker needs - coupled with a growing mismatch between the skills possessed by the workforce and those required by employers - indicate a pending crisis in workforce and economic development. Estimates recently provided by the Department of Workforce Development (DWD) indicate the need to identify and prepare between 500,000 and 750,000 appropriately skilled workers over the next decade. Wisconsin's Workforce Development and Job Center system is best positioned to meet this challenge as the most accessible and effective means to match the needs of the workforce to the needs of employers. This Workforce System is itself in crisis, brought on by years of insufficient investment and now - a flawed restructuring plan.

Secretary Roberta Gassman announced plans to "transform our employment and training services to best meet the needs of Wisconsin's workers and employers in the 21<sup>st</sup> century" through a May 8, 2008 internal DWD message entitled "Improvements to Wisconsin's Employment and Training Services". This message announced the redeployment of approximately 140 Job Service staff, from 38 Job Center locations across the state, to 12 urban centers entitled "DWD Skill and Career Centers." It also announced that Division of Vocational Rehabilitation (DVR) staff would be assigned to these 12 centers and such "additional 'contact point' locations to meet the business needs to effectively serve DVR customers."

Under this proposal Job Service and DVR will serve rural populations remotely, supported with as yet to be fully developed "Virtual Job Center" technology and will travel back out to unspecified non-Job Center locations in rural areas to provide services. This will leave most current Job Centers without the one resource charged with serving the general public (Job Service) and without the resource charged with serving our most vulnerable customers with disabilities (DVR). The announcement indicates that there will be "no position reductions and all staff will have the opportunity to relocate to the new regional headquarter locations..." and that this transformation would be completed by December 31, 2008. This initiative is purportedly driven by the desire to maintain staff through infrastructure cost savings.

While we applaud Secretary Gassman and the Department's recognition that this workforce development challenge requires creative solutions to identify and prepare all of Wisconsin's under-utilized and under-skilled job seekers and workers, we differ strongly on method. The following represents a different view of the structural changes proposed by the Secretary. A view based upon knowledge of local conditions and extreme concern for the impact this proposal will have on the Job Seekers, Workers and Employers of Wisconsin who will need workforce development services more than at any time in history. This alternative view contends that those most in need will be those least likely to be effectively served due to restricted service access with no guarantee of cost savings or gains in system efficiency.

**Therefore, we ask that the proposed redeployment and service site consolidation process be vacated or held in abeyance until, at least until December 31, 2008 to allow for further analysis and development of locally responsive alternatives which will:**

1. Actively engage the Wisconsin's Workforce Development Boards, Local Elected Officials and Workforce Development Professionals in their legitimate Workforce Policy Development roles.
2. Collaboratively establish clear budgetary and service level base-line data from which the success of any chosen strategy can be measured.
3. Collaboratively develop clear goals and outcome measures to be achieved by any chosen strategy
4. Result in collaborative outcome driven strategies responsive to state and local needs.
5. Include strict measures of accountability and collaboratively developed evaluation processes.
6. Reduce facilities and infrastructure costs where feasible while honoring all remaining financial obligations for facilities acquired on behalf of the Department.

The information below is provided as documentation that critical input and accountability factors are absent from the Department's plan. The point is not to cast blame but to bring about a more effective response to identified challenges. It is uncomfortable to challenge the Department and Secretary that has power and influence over your future. However, when opportunities to influence policy development are severely limited and the input provided has no impact we reluctantly take the only recourse available to us – to seek assistance from those who may still influence the final outcome and assure that the best interests of the Wisconsin's job seekers, workers and employers are served.

#### The proposed strategy negatively impacts on Wisconsin's Job Seekers, Workers and Employers

We contend that the strategy currently being implemented will limit service access and reduce service capacity and quality largely as the result of failure to consult with legitimate local decision makers and thus adequately consider local needs and circumstances. Considerable detail is provided in the balance of this document, but in summary we fear services to the general public will be less accessible as those services are concentrated in a very few locations, leaving the vast majority of the state farther from those services. Cost to job seekers to access services or to bring those services to them from central locations will be more costly than the current network of accessible Job Centers. The populations targeted by this initiative have the least access and capability to benefit from technological solutions. Funds will be shifted from training to infrastructure in order to compensate for the loss of contribution from DWD in locations where space cannot be reduced. In one area alone between \$180,000 and \$250,000 will need to be shifted from training to facilities costs to make up for the DWD losses.

#### The Department's decision making process lacked appropriate outside input

This restructuring concept was first presented to a small group of local workforce development directors on April 25, 2008 through a series of Power Point slides. Input provided at the time suggested that other alternatives be considered and local Workforce Development Boards, Local Elected Officials and Regional Partnerships be consulted to find solutions more attuned to local needs. On Wednesday, May 7, 2008 the same information was presented to a full complement of Workforce Development Directors. Similar suggestions were made to engage the local workforce policy and governance structure in finding locally compatible solutions. The Directors were informed that they had one week to submit comments. No official written proposal was provided to react to. The following day (May 8), Secretary Gassman issued a letter by email to all Job Service and Division of Vocational Rehabilitation staff informing them of the restructuring that would be initiated almost immediately and completed by December 31, 2008. Job Service staff would be reassigned to the 12 designated urban sites and DVR staff reassigned to those 12 plus a limited number of other as yet to be determined locations.

Comments requesting consideration of alternatives and local input were forwarded despite the decision of the Secretary to pursue this course of action prior to the stated deadline. The advice and council of the legislatively authorized Workforce Development Boards was, however, ignored. The Governor's Council on Workforce Investment was informed of the decision. The decision to move forward with this strategy was rendered by the Secretary in consultation with its Chair and Executive Committee and the membership results of the decision which was presented as a finished product without debate or action. Those in attendance were told that this proposal had the full support of the Governor. During the meeting at which this strategy was unveiled to the full Council, the Secretary made numerous statements indicating that there was nearly universal support of this decision, with only limited concerns to be readily addressed by the Department which she pledged would act as a "good partner". A sweeping change effecting hundreds in the workforce development community and thousands of job seekers and employers was implemented with no formal review and comment period and no real consideration of the proper role of local decision makers.

At the most recent Governor's Council on Workforce Investment (CWI) meeting, two members of the Council asked questions about the degree of acceptance of this proposal. They indicated that they had heard there were concerns being expressed from many who questioned the proposal. The Secretary informed the Council that there was little or no opposition and the concerns that had been registered largely related to lease costs which the Department will resolve amicably as a "Good Partner." This statement was made despite having received verbal and written critiques of the proposal. The CWI Chair indicated that only those areas plagued with poor performance were expressing concern. Analysis will show that expressions of strong opposition had been submitted from among the highest performing areas of the state. Critiques by news media were cited, but dismissed as being based on incomplete information.

The proposal failed to consider significant factors relating to cost, efficiency and effectiveness

The Department's proposal indicates that money will be saved from leases and other infrastructure cost reductions that will allow investment in staff capacity. When asked to quantify the savings on a regional basis against which local cost saving alternatives could be compared, DWD representatives indicated that such regional figures could not be provided. Therefore, no base-line has been provided from which to tell if actual savings have been achieved. **How can the success or failure of this strategy possibly be determined if no baseline cost and service data has been provided?**

The proposal calls for the same number of staff to be maintained but in fewer locations as a presumption of cost savings. Many of the sites that will be abandoned are in rural areas, often with lower costs. Movement is planned to urban locations often with higher cost. One might logically conclude that the same number of staff will need the same amount of space and abandoning lower cost space in favor of higher cost space will cost more not less. Never-the-less, with no comparison of the current costs and no accurate determination of the proposed cost in the new locations, it will be hard to judge if cost any savings or increases are being realized. **A thorough analysis of the actual current costs of facilities compared to the proposed cost of the restructuring is absent and must be provided.**

Much of the excess space that the department is faced with maintaining is in the high cost urban centers that the Department is transferring staff to while space more convenient to Job Seekers and employees is being abandoned. **Why is the Department favoring the maintenance of higher cost urban space over lower cost, more accessible, rural locations?** Why not abandon the excess space in these urban centers and keep staff closer to their customers and their homes?

In many cases other organizations will have to pick up these same space and infrastructure costs as these commitments extend beyond the timetable proposed by DWD or the physical configuration of sites cannot be reduced just because a partner chooses to leave. Costs may be shifted but the system may not realize any savings. It has also been claimed that this theoretical reduction of infrastructure costs will result in increased training fund availability. In fact the opposite is likely to occur as training resources from partner organizations will have to be shifted to cover the unfunded infrastructure costs brought about by the redeployment. The Job Service budget where savings are purported to occur has no training fund and savings are undocumented. **An analysis to the impact of cost shifting must be provided.**

Additionally, most staff who will be relocated reside near their current Job Center locations. Many will be forced to travel to their new locations over great distances at increased personal expense and energy consumption. Many senior staff will choose to retire rather than take on this additional expense. We understand that 12 individuals have done so already and more. With position freezes in place, these positions will not be refilled and, while this may actually result in some cost savings, service capacity will be lost.

The restructuring proposal also indicates that these same staff will then travel back to more remote locations to provide services which are much closer to the locations that are being abandoned. This will require costly travel reimbursement, high energy usage and considerable non-productive travel time necessary to get staff resources back to the areas that are deserted. **An analysis of the true cost of travel, both personal and programmatic as well as an analysis of the loss of productivity during extended travel time and the loss of staff capacity resulting from increased retirements or resignation must be completed to assure that this is an efficient approach.**

The proposal lacks clearly stated goals, outcome measures and evaluative processes

The major positive element of this restructuring proposal is the recognition of the need to more effectively reach out to under-utilized populations and bring their skills into alignment with the needs of the economy. The result, if successful, being to address the worker and skill shortages, strengthen the economy, raise the income levels of workers and enhance Wisconsin's tax-base - All very laudable goals. The proposal indicates that the centralization of DWD staff resources will improve these outcomes when accompanied with investments in technology that will substitute for the presence of staff in remote locations. **Measures on the impact on target populations are lacking and must be developed.**

Populations targeted by this proposed strategy are those least technologically able and are often lacking in access to technology. Technological solutions are of great assistance in this endeavor, but are of little use to those who lack access and capability to use technology without assistance. The staff assistance necessary to allow the full realization of technological solutions will now be far removed from the target populations – or as stated above costs will be incurred to bring the staff back out to the now remote locations. **The costs of the proposed technological solutions must be factored in to any pre-post cost comparison and service effectiveness and impact must be measured.**

The Secretary has stated on several occasions, including the most recent meeting of the Governor's Council on Workforce Investment (CWI), that current system has served 16,600 people this past year and that this must be improved upon if the needs of Wisconsin's economy are to be met. She assured the audience that this restructuring proposal would reduce costs of infrastructure, raise staff capabilities and increase services through the redeployment of DWD human resources and increased use of technology. A CWI member observed that if these figures are correct the 142 staff to be redeployed serve just over 100 people each per year. The Secretary responded that staff from other agencies contribute to those service numbers. To which the member responded, "you mean to say that the number is less than 100 per staff, per year?" Another member commented that if this is so the system could never make a dent Wisconsin need for skilled workers. A subsequent query of the Wisconsin's own Workforce Development Data System shows that **124,726 individuals were officially registered for service between July 1, 2007 and June 27, 2008.** It should be noted that the Job Center system serves many more people than those officially registered as that number does not include much of the walk-in traffic and many thousands touched by other partner agencies. One would only hope that the public repetition of such a low service level would not be used as the measure from which service improvement for any revised system would be evaluated.

The proposal indicates service improvements and cost savings but does not establish any specific service, cost or outcome measures. The proposal does not state definitive, accurate baseline data from which to measure improvement, nor does it specify any evaluation methodology. **Clear, accurate baseline service and cost data, appropriate outcome measures and effective evaluation methods must be established to assure accountability.**

Thank you for your attention to this matter of great importance to Wisconsin's job seekers, workers and employers.

**Attachment II**  
**Workforce Redesign and Improvement Plan Financial and Programmatic Impact**  
**On the West Central Wisconsin Workforce Development Area**

The following summary is provided to illustrate the severe implications, both financial and programmatic, that the proposal of the Secretary of the Department of Workforce Development (DWD) will have on the West Central Wisconsin Workforce Development Area. We entered into good faith agreements to secure space on behalf of DWD and we relied upon the stated commitments of the Department to our detriment, as those commitments are now being renege upon raising serious ethical and legal concerns.

The proposed redeployment of staff by the Department of Workforce Development effects two Divisions of that Department, the Division of Vocational Rehabilitation and Job Service. The planned reassignment of Job Service and Vocational Rehabilitation staff persons, if fully implemented, will result in Job Service renege on space obligations in River Falls, Rice Lake, and Chippewa Falls. Job Service recently vacated space in Menomonie and earlier in the program year vacated space in Balsam Lake. Vocational Rehabilitation will renege on space obligations in River Falls, Balsam Lake, Neillsville and Chippewa Falls. Vocational Rehabilitation has requested access to additional space in Rice Lake and Menomonie which if not granted, will result in DVR vacating all space at the end of what DOA/DWD claims to be month-to-month tenancies. In the meantime DVR has vacated its space in Menomonie.

The analysis below pertains to locations where Workforce Resource is the master lease holder: Rice Lake, River Falls, Balsam Lake and Neillsville. Workforce Resource is the building owner in Menomonie. Chippewa Falls is also affected, and CVTC the building owner will have to provide that information.

Programmatically this action will mean that Job Service, the only Job Center partner organization charged with providing services to the general public, will be absent from all area Job Centers with the exception of Eau Claire. Those members of the general public not eligible for WIA, or other targeted programs remaining in our Job Centers, will lose access to core services unless they expend considerable resources to travel to Eau Claire or DWD expends considerable resources to travel to those job seekers (see Attachment I for other implications). WIA services will be reduced as identified below as funds will need to be reallocated from training and services to the payment of lease and other infrastructure costs being abandoned by DWD.

Additional space will have to be acquired in Eau Claire to house these relocated staff that may require acquisition of space outside of the current Job Center, while space exists for these staff in current Job Center locations. These staff will now incur excessive costs to travel to their new locations and then will be compensated and reimbursed for travel expenses to travel back to remote locations.

The net financial impact on Workforce Resource, and thus the cost of these actions will be between \$181,000 and \$251,000. This amounts to between 9% and 11% of the region's Workforce Investment Act (WIA) allocation for the current year and will translate into a significant reductions in WIA services should this plan be fully implemented. The cost impacts are as follows:

	<u>End Dates of Master Leases</u>	<u>Loss Option 1*</u>	<u>Loss Option 2</u>
Rice Lake –	11/31/2010	(\$91,205)	(\$51,784)
River Falls –	8/31/2011	(\$122,892)	(\$122,892)
Balsam Lake –	12/31/2009	(\$2,900)	(\$2,900)
Neillsville –	12/31/2010	(\$4,160)	(\$4,160)
<u>Menomonie-</u>	<u>6/30/2010</u>	<u>(\$30,386)</u>	<u>(\$68)</u>
Total Loss		(\$251,543)	(\$181,804)

Option 1 involves the threatened vacating of DWD space in all locations. Option 2 involves the acceptance of vacating all space in River Falls, Neillsville, Balsam Lake and the relocation of DVR staff into Menomonie and Rice Lake coupled with the loss of Job Center resource room and other contributions those two locations. These options were presented to us by representatives of DWD and the Department of Administration on June 24, 2008. In essence we were told to take option 2 or leave it. When asked about the ethical issues of renegeing on these other documented commitments the DOA representative indicated that in the absence of a "signed" written sublease no legal commitment existed. When confronted with the ethical issue of DWD/DOA delaying and then withholding these subleases to avoid the presence of a "signed" sublease, he responded – "You should have been more persistent."

In each of these locations space was acquired or built to the specifications of Job Center partners, including Job Service and Vocational Rehabilitation with documented commitments to continue occupancy through the terms of the master leases. Below you will find an explanation of the issues relating to each site in question.

### Rice Lake

After several years of operating out of multiple locations in Rice Lake a space sufficient to house all Job Center partners was found in 2005. DWD issued an RFP to assure the site was the most cost effective and upon settling on the current Job Center location asked Workforce Resource to act as the Master Leaseholder and negotiate space acquisition, build-out and occupancy. We were informed that we would need to conclude a master lease for the space prior to signature by the State of Wisconsin as this master lease would need to be attached and referenced in any subsequent sublease with State of Wisconsin.

A formal space request was approved by the Department of Workforce Development and partner space needs were verified by Workforce Resource prior to entering into the master lease agreement. The building owner indicated a need for a minimum 5 year lease in order to amortize costs of build-out within the lease rate structure desired by the tenants. Based on the acceptability of space allocation, terms and costs Workforce Resource (WRI) entered into a 5 year lease agreement on behalf of WRI, Job Service, Vocational Rehabilitation and the Center for Independent Living (CIL). Unlike DWD/DOA, CIL experienced a loss of need for space following signing of their sub-lease and asked for reduced space allocation. When informed that there was no option to shift cost to other partners, they continued to fulfill their obligations.

Due to a termination of the lease for the previously occupied DWD space, WRI even negotiated temporary space provisions for Job Service and VR to allow them to be housed in temporary quarters, at a reduced rate, adjacent to the new location while the build-out was being completed.

WRI presented a proposed sublease agreement for the agreed upon 5 year duration and specified costs and cost allocation to the partners based on a state developed template previously used in other locations. DWD and the Wisconsin Department of Administration (DOA) rejected this template, indicating that format was no longer in use, and indicated they would assume authorship of any subsequent sub-lease agreement. CIL proceeded to sign the originally proffered lease agreement. We have been attempting to obtain a signed sublease from DWD/DOA ever since to no avail. We have an extensive trail of communications to verify these attempts and a variety of stated reasons why those leases have not been forthcoming. Recently we were told that all leases are under review and will not be signed. Requests to obtain copies of the proposed leases have been rejected. Earlier drafts which we requested modest changes therein clearly indicate intent to sublease the specified space for 5 years.

Until recently, the last communication from DWD/DOA regarding this proposed sub lease was October 2007. At that time we were told that the River Falls lease would be dealt with first as a model and Rice Lake would follow. Repeated requests for the subleases at both locations were not answered.

On Tuesday, June 24, 2008 representatives from DWD/DOA informed us of their interest in entering into a renewable, one-year sublease for the current office space plus a .40 multiplier for common space charges not to include any Job Center, conference room or other space. Job Service would be vacating their space and this space would be made available to Vocational Rehabilitation. This space was needed to allow VR staff to vacate space which we have acquired for them in Neillsville and Balsam Lake. The net impact of this reduction in common space/job center space charges would be a loss of - \$51,784 over the remaining term of the master lease that we were asked by DWD to execute on their behalf. The original agreement and sublease proposal included DVR contributing proportionately to all common and shared space including Job Center resource space.

The Rice Lake Job Service staff person will now be required to commute well over two hours each day to her new location in Eau Claire. The current Neillsville VR person will commute from Cadott to Rice Lake and the Balsam Lake person will need to commute to Rice Lake. Basic Job Center costumer coverage will be reduced as VR staff will not provide general Job Center assistance or pay for any general Job Center operating cost.

### River Falls

During an earlier attempt by Job Service to remove staff from the Pierce County Job Center, then located in Ellsworth, Workforce Resource and the County Boards Consortium and Workforce Development Board intervened with Secretary Gassman and stopped the relocation to New Richmond. At that time, indications were made that if a more appropriate single location could be found to serve both Pierce and St. Croix Counties the local structure would attempt to secure such a location. The County Board Chairs agreed that if space could be located in River Falls, a community on the county line, that would be acceptable. In 2005, such a location was found. This was occurring simultaneously with the attempts to conclude a sublease in Rice Lake. Similarly, space needs were identified and agreed to, build-out was arranged a 5 year master lease agreed to and proposed subleases presented to partners. Similarly the initial sublease tender was rejected in favor of DWD/DOA assuming responsibility to draft sub-leases.

During the course of these negotiations, DWD/DOA indicated that the River Falls lease would take precedence and be negotiated first. During the build-out partners were given the option of enclosed offices or open space within which to place office partitions. All partners selected enclosed offices with the exception of Job Service opting for partitions. Space continued to be allocated based on original requests as the overall suite lay-out could not be changed. Upon installation of partitions that required less space than originally requested by Job Service, DWD/DOA indicated they desired to have the space in the DWD/DOA sublease reduced by 200 sq. ft. They were informed in September of 2007 that this was not possible as the build-out occurred based on their original request and no other partner could be expected to pick up this space cost. This was the last communication on River Falls from DWD/DOA. Repeated attempts to obtain sub leases went unanswered. The original agreement and sublease proposal included DVR contributing proportionately to all common and shared space including Job Center resource space.

On June 25<sup>th</sup>, 2008 representatives from DWD/DOA indicated that all DWD staff would vacate the River Falls Center and that no obligation existed for that space. The financial impact of two Job Service and three DVR staff vacating all River Falls Job Center space is \$122,892 over the remainder of the master lease through 2011. This will vacate 50% of the Job Center space and will leave the Center without a valid provider of general population services and services to individuals with disabilities. Job Service

staff residing in the River Falls area will be required to commute to Eau Claire. It is being proposed that DVR will relocate staff to the Menomonie Job Center.

The result will be that the closest comprehensive Center to Wisconsin's fastest growing county (St. Croix) will now be in Woodbury, Minnesota. This is at a time when we are struggling to retain Wisconsin workers, who are readily lured to Minnesota, for Wisconsin's employers.

### Menomonie

The Dunn County Job Center was built specifically for Job Center purposes and occupied in 1998. It was built to the specifications of Job Service, DVR and other Job Center partners. DWD/DOA entered into a five year lease with two-two year extensions that were exercised. Job Service continued to occupy space for a period of months following the completion of the second lease extension without a signed sub-lease and then vacated their space but continued to pay lease costs. DVR continues to occupy two offices and pays a percentage of common space but no share of Job Center space. As this building was built specifically for this purpose, overall space cost cannot be reduced by the departure of partners.

On June 24, 2008 DWD/DOA representatives presented an offer to expand the space currently occupied by DVR to include the staff from River Falls resulting in a need for the Job Service office space two additional offices and space for one cubicle for a one year renewable lease term. This would not include any contribution to Job Center Resource Room, conference room or space other than .4 factor for common space. Because this would be an increase in office space, it would result in a near break-even financial situation with the exception of it being based on occupancy of six office spaces, compared to the current situation which is based on four occupants. Therefore each proposed DWD occupant would be paying a significantly lower portion of the overall cost of the Center compared to other tenants. The threat was then made that if this was not found to be acceptable, all DVR/Job Service space would be vacated after July 1, 2008. We had received written notice of the intent to vacate what was regarded by DWD/DOA as a month-to-month tenancy by certified mail on June 16, 2008. The letter was dated May 30, 2008, but the post mark was June 11, 2008. This fails to meet the standard of sufficiency of notice for terminating a month-to-month tenancy.

Substitute notices were provided for Menomonie with revised dates for the proposed actions asking for our response to essentially the offer stated above, but effective July 15, 2008. In the meantime, Vocational Rehabilitation announced that they were leaving, turned in keys and vacated their space on June 30, 2008.

Under these two alternatives, we will experience either a \$68 loss over the remainder of the two year period necessary to fully retire the debt associated with building construction or a loss of \$30,386. We will either have to accept the total loss of commitment in River Falls or accept the total loss of space commitment in River Falls and Menomonie. Again access to services for the general public and individuals with disabilities will be severely restricted as these staff have now been sent to Eau Claire. We are unaware of any public notice being provided that DVR staff will no longer be available in Menomonie. Workforce Resource is left with the burden of informing customers of this fact with no information to what to tell them to do.

### Neillsville

Job Service vacated space in Neillsville several years ago and Workforce Resource assumed that cost as there was no way to reduce the space under the building configuration. DVR is now proposing to vacate the office they maintain at this Center effective July 1, 2008.

At the June 24, 2008 meeting with DWD/DOA representatives, we were informed of the intent to move the Neillsville DVR staff person to Rice Lake. This will leave Clark County without Job Service general public services or DVR service access for individuals with disabilities.

WRI was faced with the need to renew the lease for the full space including that of DVR. The minimum renewal period was through the end of 2010. A proposed sub-lease addendum was forwarded to DWD/DOA, as has been past practice and this addendum has not been acted upon. We had received written notice of the intent to vacate what was regarded by DWD/DOA as a month-to-month tenancy by certified mail on June 16, 2008. The letter was dated May 30, 2008, but the post mark was June 11, 2008. This fails to meet the standard of sufficiency of notice for terminating a month-to-month tenancy. The cost impact will be \$4,160 through the end of the lease term.

To the best of our knowledge the DVR staff person has vacated the Niellsville location and is now reporting to Rice Lake. Workforce Resource is left with the burden of informing customers of this fact with no information to what to tell them to do.

#### Balsam Lake

Job Service vacated space in Balsam Lake several months ago and Workforce Resource assumed that cost as there was no way to reduce the space under the building configuration. DVR is now proposing to vacate the office they maintain at this Center effective July 1, 2008.

At the June 24, 2008 meeting with DWD/DOA representatives, we were informed of the intent to move the Balsam Lake DVR staff person to Rice Lake. This will leave Polk County without Job Service general public services or DVR service access for individuals with disabilities.

WRI was faced with the need to renew the lease for the full space including that of DVR. The minimum renewal period was through the end of 2009. A proposed sub-lease addendum was forwarded to DWD/DOA, as has been past practice and this addendum has not been acted upon. We had received written notice of the intent to vacate what was regarded by DWD/DOA as a month-to-month tenancy by certified mail on June 16, 2008. The letter was dated May 30, 2008, but the post mark was June 11, 2008. This fails to meet the standard of sufficiency of notice for terminating a month-to-month tenancy. The cost impact of having to maintain this space will be \$2,900 through the end of the lease term.

To the best of our knowledge DVR staff person has vacated the Balsam Lake location and is now reporting to Rice Lake. Workforce Resource is left with the burden of informing customers of this fact with no information to what to tell them to do.

**Attachment III**  
**Alternative Proposal**  
**Workforce System Redesign and Improvement**  
**For West Central Wisconsin**

Please consider the proposal outlined below as an alternative to that presented in the Department of Workforce Development Workforce Redesign and Improvement Plan. This plan is provided only for consideration in West Central Wisconsin, and does not purport to be a plan that has universal application. We would not presume to have the knowledge or understanding of local circumstances elsewhere and believe that any alternatives considered for local areas should be derived from the Workforce Development Governance system for those regions.

It is our understanding that there are nine DWD Job Service staff allocated to West Central Wisconsin through Wagner Peyser, VETS and Trade Act funding. Currently Job Service staff are stationed in Chippewa Falls, Eau Claire, Rice Lake and River Falls. Vocational Rehabilitation staff were assigned to Menomonie, Rice Lake, River Falls, Balsam Lake, Neillsville, Eau Claire and Chippewa Falls.

1. Maintain Vocational Rehabilitation staff in current locations.
2. Maintain Job Service staff in their current locations reducing personal and reimbursed travel expense and eliminating the need to acquire additional space in Eau Claire
3. Evaluate options to fund each Job Service staff person in this region with a combination of Wagner Peyser, VETS and Trade Act funding to enhance job seeker outreach. Even consider allocating a portion of DVR funding to Job Service staff for outreach.
4. Evaluate the potential of assigning one combination funded Job Service staff person to Balsam Lake, Chippewa Falls, Neillsville, River Falls, Menomonie and Rice Lake with the remaining Job Service staff to Eau Claire.
5. Assign Job Service staff as the primary Job Seeker Customer Service representatives in each area Job Center charged with providing staff assisted core services, needs assessment and identification of Veterans, UI claimants, TAA eligibles, ( and potentially individuals with disabilities) provide service assistance (VETS, UI, TAA) or refer to agencies providing intensive services.
6. Modify information technology structures to move to more cost effective IT configurations than currently used by DWD. Workforce Resource has done this with substantial savings.
7. Honor current space commitments and reduce space as appropriate and feasible as commitments expire. – Workforce Resource will work with DWD to reduce infrastructure costs where feasible.

We believe that this proposal will be at least as cost effective as that proposed by the Department and will result in actual enhancement of services. We would be willing to have its effectiveness measured against the same criteria as recommended be developed in Attachment I.