

## DWD 801 Wisconsin Fast Forward Workforce Training Grants

### Comments Received on the Draft Proposed Rule and DWD Responses

August 2013

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<u>Name/Organization</u>	<u>Comment</u>	<u>DWD Response</u>
Wis Survival Coalition Wis Employment First Coalition People First	The rule should reserve a defined % of grant funds for training targeted for people with disabilities, require grantees to address the needs of employees with disabilities, and target high demand fields such as the long-term care workforce.	The Department will encourage proposals which emphasize training for people with disabilities, within the overall goal of the statute to address the improvement of critical workforce skills.
Andy Preissner, A to Z Machine Co.	K to 12 institutions should not be excluded from grant eligibility.	This provision has not been changed. The statute requires these grants to focus on the training of unemployed and underemployed workers and incumbent employees of businesses in this state.
Nels Lawrence Kaukauna School District	K to 12 institutions should not be excluded from grant eligibility.	
Tony Evers State Superintendent of Public Instruction	K to 12 institutions should not be excluded from grant eligibility.	
John Higgins Ozaukee County	Will a youth apprenticeship consortium be eligible to apply for a Wisconsin Fast Forward grant?	Youth apprenticeship programs will not be eligible, but unemployed high school graduates with YA experience could qualify for an employer's WFF sponsored training program.
Brian Vigue Wis. Workforce Development Association	Wis. Fast Forward should, reward applicants that apply as consortiums, which could include private businesses applying with WDBs, technical colleges, economic development or CBOs. WDBs are well positioned to coordinate with other partners in such consortiums.	Agree in general. However, individual grant proposals will be evaluated on their merits.

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Angela Hupf, Memorial Health Center Medford	Wis. Fast Forward should reward applicants that apply as a consortium, which should include workforce development boards as required or key partners, working with private business, technical colleges, economic development agencies, or community based organizations.	Agree that workforce development boards will be valued and effective participants in grant application consortiums. However, DWD will review individual grant proposals on their merits and therefore declines to require the inclusion of WDBs in grant proposals.
John Kissinger Milwaukee Area WIB	(similar comment)	
Judy Aspling Northwest Wisconsin WIB	(similar comment)	
Mary McPhetridge Ashland Area Chamber of Commerce	(similar comment)	
Pat Schramm Workforce Development Board Of South Central Wisconsin	(similar comment)	
Tom Barrett Mayor, City of Milwaukee		
Brian White GE Power & Water	(1) "Capital equipment" should be defined as having a useful life of 2 or 3 years. (2) Grant funds should not train people who will work less than 20 hours per week. (3) An audit should be required is a grant is above a certain dollar amount. (4) The percentage of required match should be Specified.	(1) Including equipment with a life of 1 year is in accordance with Generally Accepted Accounting Principles. (2) Agree, this will be covered in the grant applications and contracts. (3) Agree, this will be covered in the grant guidelines and contracts. (4) Agree, this will be covered in the grant program announcements.
Chris Lefeber Quest Engineering Inc.	Consider the unique needs of small businesses and allow for training to be individually tailored to match their needs.	Agree that this is an important aspect of the program and we believe our procedures will be responsive proposals from small businesses.
Gary Beier Wis. Automobile and Truck Dealers Association	This could be a positive step forward for workforce economic development in Wisconsin.	We appreciate the comment.

<p>Reed Hall Wis. Economic Development Corp.</p>	<p>Comments in support of the overall design and approach of the Wisconsin Fast Forward grant statute.</p>	<p>We appreciate these comments.</p>
<p>Kathy Heady Wis. Economic Development Corp.</p>	<p>(1) Suggestion on definition of “incumbent worker” (2) Will grant funds be available for training employees who work less than 40 hours/week? (3) Awards should be capped.  (4) Will some types of business be excluded?  (5) Avoid funding projects that can be covered by other training programs. (6) Specify that these grants are not for “routine” training that a company already provides.</p>	<p>(1) Definition has been modified. (2) Yes.  (3) The rule limits grants to no more than \$400,000 per year per applicant. (4) No, the rule does not exclude any type of business from applying. (5) This will be one of the criteria of the process for approving GPAs. (6) DWD anticipates that this will be achieved by the definition of an eligible project and by the evaluation process.</p>
<p>Kelly Ryan Workforce Central Funders Collaborative</p>	<p>Collaboration among the major stakeholders is the key to lasting impact for training programs. Training investments should be based on the common needs of employers and workers.</p>	<p>DWD expects that proposals based on these concepts will be the most successful in the grant application evaluation process.</p>
<p>Morna Foy Wis. Technical College System</p>	<p>(1) The rule should clarify the types of funds that can be used for match. (2) Can administrative costs covered by partners count towards match? (3) What is meant by “required match period?” (4) What are the distinctions between the evaluation criteria? How will they be measured? (5) Can you clarify the terms of DWD ownership of materials developed with grant funds? (6) If a grantee does not have access to BLS worksite survey forms, can there be an alternative? (7) Will there be alternatives if employers are unwilling to report wages and hours?</p>	<p>(1) Agree, this has been done. (2) Yes.  (3) The term of the grant. (4) This will be explained in the GPAs.  (5) Pre-existing materials would not be considered to be owned by DWD. (6) The BLS forms will be provided.  (7) No, reports are important and will be a condition of every grant.</p>

(8) Will a trainee be able to qualify in more than one category (unemployed/underemployed/student/incumbent) or move from one category to another?

(8) No.

(9) Will an out-of-state business seeking to move to Wisconsin qualify for a grant?

(9) A grant applicant will be required to have a Wisconsin presence.

(10) Can case management services be an allowable use of grant funds?

(10) Applicants may submit proposals, which DWD will review under the established evaluation criteria.

(11) Can identifiers other than SSNs be used?

(11) No, evaluation of the results requires the use of SSN data. Confidentiality will be a priority.

Susan May  
Fox Valley Technical College

(1) It would help employers and technical colleges for the Wis. Fast Forward rules to be as consistent as possible with the rules for workforce advancement training grants.

(1) DWD will keep this in mind, but the requirements of the Wis. Fast Forward statute do require some differences.

(2) Recommend that business and organizations be required to partner with an accredited educational institution.

(2) This would probably help an applicant in the evaluation process, but DWD does not want to create mandates in the rule that restrict the discretion to submit innovative proposals.

(3) Consider basing grant awards on an inclusive hourly instructional rate rather than the actual costs of salary, fringe, supplies, materials, etc.

(3) DWD will not do this. Reimbursement should be based on actual costs.

(4) Allow for grant applications at least several times throughout the year rather than only one annual application period.

(4) Agree.

Tim Casper  
Madison College

(1) Allow limits to be calculated based on the total project cost.

(1) Agree.

(2) Allow an exception to the administrative cost cap for instruction materials related to a nationally portable industry recognized skills credential.

(2) Agree.

(3) Can DWD do the follow-up on trainee employment, hours and wages?

(3) DWD will do this on a long term basis but we also need to require an end-of-grant report on this data from the employer.

<p>Paul Gabriel Wis. Technical College District Boards Association</p>	<p>Technical college districts should be eligible to apply for grants.</p>	<p>Agree, this has been clarified in the rule text.</p>
<p>Rebecca Hogan Wis. Economic Development Association</p>	<p>(1) Evaluation metrics should focus on the employer as well as the employee. (2) Reporting requirements should not impose a burden on grantees.  (3) The provision on DWD ownership of materials developed with grant funds could be a disincentive to grant applicants.</p>	<p>(1) DWD will measure economic impact as well as the impact on trainees. (2) DWD will keep this in mind and try to make The reporting requirements a “user-friendly” as possible.  (3) DWD does not intend to apply this provision In an unusual or extreme manner.</p>
<p>Sarah White Center on Wisconsin Strategy</p>	<p>(1) Providing a copy of a COWS report on industry partnership projects. (2) Providing COWS documents which include guidelines for successful workforce investment.</p>	<p>These documents have been helpful and Instructive in reviewing and preparing the rule text in final draft form.</p>
<p>Robert Borremans Southwest Wis. Workforce Development Board</p>	<p>(1) Employers should play an active role in training design. (2) Talent-driven job matching and recruitment should be emphasized. (3) Work readiness and transitional training should be available. (4) Areas of high unemployment should have priority. (5) Allow for flexibility as to how employers may provide matching funds. (6) Support innovation.</p>	<p>(1 – 6) Agree to all, within the context of DWD’s evaluation of applications submitted in accordance with announced criteria.</p>