



EMPLOY MILWAUKEE POLICY 26-01

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POLICY: 26-01

SUBJECT: WAITLIST IMPLEMENTATION

ISSUANCE DATE: 08/27/26

EFFECTIVE DATE: 08/27/26

REVIEWED DATE: Not applicable

REFERENCES:

- Workforce Innovation and Opportunity Act (WIOA)
- 20 CFR Part 680 (Adult & Dislocated Worker Programs)
- 20 CFR Part 681 (Youth Program)
- Wisconsin DWD WIOA Title I-A & I-B Policy & Procedure Manual
- Wisconsin WIOA Combined State Plan
- Employ Milwaukee ITA Policy

POLICY SCOPE

- ☐ EMPLOY MILWAUKEE AGENCY
- ☐ WIOA WDA 2 SYSTEM
- ☒ WIOA TITLE I-B PROGRAM(S)
 - ☒ ADULT PROGRAM
 - ☒ DISLOCATED WORKER PROGRAM
 - ☒ YOUTH PROGRAM
- ☐ NON-WIOA PROGRAMS
- ☐ RE ENTRY PROGRAMS

I. BACKGROUND

Employ Milwaukee's Individual Training Account (ITA) Policy authorizes the organization to prioritize training programs that result in WIOA-recognized credentials and to implement a waitlist for participants seeking direct-cost training services when spending on such services reaches or exceeds the specified percentage of available funds. When a waitlist becomes necessary, it must be administered in alignment with the Wisconsin Department of Workforce Development's WIOA Title I-A and I-B Policy & Procedure Manual Chapter 3.6. The ITA policy further clarifies that individuals cannot be denied the opportunity to apply for WIOA Title I-B programs even when a waitlist is active.

II. PURPOSE

The purpose of this policy is to establish consistent, compliant procedures for implementing and managing a waitlist for WIOA Title I-B programs and services. This policy ensures that waitlist processes are aligned with state guidance, uphold Participant Priority of Service requirements, maintain accurate participant tracking, and protect equitable access to training opportunities during periods of limited training funds.

III. POLICY

Waitlists may be implemented at program entry or for direct-cost services. Program entry waitlists apply to eligible individuals waiting to enter the designated WIOA Title I-B programs; and direct-cost service waitlists apply to existing participants waiting for training, supportive services, or other direct-cost services, as applicable for a specified WIOA Title I-B program. Waitlists must be managed in accordance with state WIOA policies and must reflect both local and state Priority of Service requirements. All individuals must be allowed

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to apply for WIOA services, regardless of the presence of a waitlist. Waitlists are enacted when expenditures meet or surpass the threshold established in the ITA Policy.

Waitlisted participants must be properly recorded with accurate priority levels and enrollment dates. Participants remain on the waitlist unless they voluntarily withdraw or are removed after three unsuccessful contact attempts using at least two communication methods.

Under no circumstances shall the Service Provider implement or operate a waitlist or lift a waitlist unless expressly authorized in writing by EMI or initiated at EMI's direction.

IV. PROCEDURES

A. Notification of Local Program Liaison (LPL)

Employ Milwaukee will notify its LPL, in writing, before implementing any waitlist and when the waitlist is lifted.

B. Initiating the Waitlist

Service Providers must begin using a waitlist when directed by Employ Milwaukee, when funding limitations trigger its implementation.

C. Participant Identification and Waitlist Tracking

Providers must ensure all individuals placed on the waitlist have been determined eligible and are accurately identified on a master waitlist, with information included but not limited to:

1. Participant name
2. Participant ID #
3. Registration date (for program entry waitlists)
4. Enrollment date (for direct-cost service waitlist)
5. Priority of Service category (WIOA Title I B Adult only)
6. Date of entry on to the waitlist
7. Planned training service

D. Required Participant Engagement While Waitlisted

1. All WIOA partner staff shall explain the waitlist to participants
 - a) The State of Wisconsin Department of Workforce Development allows Workforce Development Boards to implement waitlists for WIOA programs when there are limited funds.
 - b) Currently Workforce Development Area 2 has limited funds for program entry/direct-cost services; therefore, WIOA Title I-B service providers have been required to implement a waitlist.
2. At minimum, every 90 days, for persons on the:
 - a) Program entry waitlist
 - 1) WIOA partner staff will contact individuals to confirm continued interest in the WIOA Title I-B program.
 - b) Direct-cost service waitlist

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- 1) Confirm that the requested training service remains appropriate for the participant's goals and needs.
- 2) Staff must complete an IEP/ISS Review service with each waitlisted participant.

All actual and attempted engagement must be documented in case notes.

E. Movement From Waitlist

1. Individuals are released in:
 - a) Priority order, then
 - b) Date of entry on to the waitlist, then
 - c) Registration date – for program entry waitlist, or
 - d) Enrollment date – for service for direct-cost service levels

F. Removal from the Waitlist

Individuals may be removed from the waitlist if:

1. They voluntarily withdraw
2. They become ineligible
3. They fail to respond after three contact attempts, using at least two different communication methods (e.g., phone, text, email)

G. Program Access

Staff may not deny individuals the opportunity to apply for WIOA Title I-B programs, even during active waitlist periods.

V. ACTION REQUIRED

- A. Posting of this Policy to the Employ Milwaukee website for open access to all personnel.
- B. Staff must ensure accurate tracking, communication, and documentation for all individuals placed on the waitlist.
- C. Providers must consistently deliver the required explanation script to any individual referred to the waitlist.

REVISIONS: [Admin Memo 25.02](#)

BOARD APPROVAL DATE: [08/27/2026](#)

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