



# WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) LOCAL PLAN

Wisconsin Workforce  
Development Area (WDA) 2

July 1, 2016 — June 30, 2020

Updated June 30, 2017

**WDA 2 WIOA Local Plan: July 1, 2016 – June 30, 2020**  
**Updated June 30, 2017**

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**I. Workforce Needs, Labor Market Analysis, and Assessment of Workforce Investment Activities and Assets**

**A. Local Workforce Needs**

**1. Describe the workforce investment needs of the local area as they relate to:**

**a. Employers/Businesses**

Employ Milwaukee analyzed labor market information to identify target industries based on a variety of factors including overall growth rates, high growth rates in key subsectors related to regional economic clusters, high quantity of total jobs, family-supporting median wages, and existence of entry- and mid- level jobs connected to career pathways.

The private sector industries that employ the most workers in Milwaukee County and meet these criteria are health care and social assistance (NAICS 62), manufacturing (NAICS 31-33), construction (NAICS 23), retail trade (NAICS 44), accommodation and food service (NAICS 72), and finance and insurance (NAICS 52). (Employ Milwaukee combines retail trade and accommodation and food service into one industry named “hospitality.”) Each industry has positive 10 year projected growth rates, with the exception of manufacturing and finance and insurance; however, those industries each have a high quantity of overall jobs and high growth in subsectors linked to regional economic clusters.

Employer feedback and analysis of labor market information shows a pattern of two overarching skills deemed necessary by employers: 1) The ability to use technology and 2) Interpersonal skills such as active listening, social perceptiveness, speaking, coordination, monitoring, critical thinking, problem solving, and service orientation (customer service).

As of June 2017, Employ Milwaukee has reviewed labor market information and employer feedback and has identified another high-demand industry sector for WDA 2; Transportation-Warehousing-Logistics. Based upon this review, transportation-warehousing (NAICS 48-49) has been incorporated into Employ Milwaukee’s high-demand growth target strategy programs and services.

**b. Job Seekers**

Unemployed or underemployed job seekers face numerous barriers to employment and self-sufficiency. Adults and youth workers who have limited skills and lack work experience, are low-income, or face other barriers to employment are disproportionately impacted by these challenges. In many cases, these jobseekers require more expansive education and training services while the career and

individualized services need to address other work supports such as childcare, transportation and housing.

Given the experience and deep knowledge base of its practitioners, Employ Milwaukee is well situated to help all job seekers. The workforce system in Milwaukee County is well equipped to serve job seekers through evidenced-based and industry-validated approaches such as career pathway systems with many bridges and stackable credentials, youth and registered apprenticeship programs, and on-the-job training programs that meet industry demands. When providing career and training services, Employ Milwaukee is committed to giving priority to public benefits recipients, other low-income individuals, and individuals who are basic skills deficient.

### **c. Incumbent Workers**

Analysis of labor market information for the Milwaukee County incumbent workforce (**Table 1**) in high demand industries shows that the current workforce is aging within all industries, especially in manufacturing. Data indicates that some industries have a majority of female workers (healthcare and finance), while others are dominated by male workers (manufacturing and construction). The majority of incumbent workers in each industry are white. The 2016 US Census Bureau “Quick Facts” data for Milwaukee County lists a racial composition of White (51.9%), Black or African-American (27.2%), Hispanic or Latino (14.8%) and Asian (4.3%) with 86.5% of county residents over age 25 having completed high school or beyond.

A review of O\*NET information for high demand occupations within each industry shows a pattern of two key skill sets necessary for workers to keep and advance in their jobs: 1) The ability to use technology and 2) Interpersonal skills such as active listening, social perceptiveness, speaking, coordination, monitoring, critical thinking, problem solving, and service orientation (customer service).

Incumbent workers must continuously grow and adapt their skill sets to keep up with the pace of technological advances in the work place. Occupations within all industries require the use of technology including data base user interface and query software, electronic mail software, time and accounting software, point of sale software, graphic and photo imaging software, spreadsheet software, as well as the ability to use tools such as bar code readers, electronic funds transfer point of sale equipment, touch screen monitors, scanners, and notebook computers. Incumbent workers must also maintain and grow their interpersonal skills in order to succeed and advance in their occupation.

<b>Table 1: Key Characteristics of the WDA 2 Incumbent Workforce</b>			
<b>Industry</b>	<b>% Retiring in the Next Two Decades<sup>1</sup></b>	<b>Gender<sup>2</sup></b>	<b>Race<sup>2</sup></b>
<b>Healthcare (62)</b>	44 %	20% Male 80% Female	62% White 38% Non-White
<b>Manufacturing (31)</b>	54%	73% Male 27% Female	74% White 26% Non-White
<b>Hospitality Retail Trade (44) Accommodation and Food Service (72)</b>	29%	47% Male 53% Female	71% White 29% Non-White
<b>Construction (23)</b>	47%	87% Male 13% Female	88% White 12% Non-White
<b>Finance and Insurance (52)</b>	45%	39% Male 61% Female	82% White 18% Non-White

**d. Youth**

Employ Milwaukee serves two main categories of youth: Out-of-School Youth (OSY) and In-School Youth (ISY). Both categories of job seekers have tremendous barriers to employment and post-secondary education, including literacy skills deficiencies, substance abuse, and other socio-economic barriers. Local workforce providers have indicated that employers often cite job-readiness skills as a primary barrier for youth employment. Often referred to as “soft skills,” youth must learn non-technical workplace competencies, including problem-solving and other cognitive skills, oral communication skills, personal qualities and work ethic, and interpersonal and teamwork skills.

Employ Milwaukee engages employers and local workforce providers to implement practical strategies, including on-the-job training (OJT), internships, entrepreneurial programs, and other ‘earning while learning’ strategies to introduce youth to the “world of work” and the necessary education and hard and soft skills to be successful. Employ Milwaukee was also certified by the State of Wisconsin Department of Workforce Development as a Youth Apprenticeship consortia leader (Career Plus consortia) starting in the 2016-17 school year.

**2. Describe any workforce investment need in your WDA not reported in 1.a-d.**

Employ Milwaukee’s service area is Milwaukee County (population 947,735), which includes the city of Milwaukee (population 594,833) and 18 other local municipalities. The city of Milwaukee comprises 62.8% of Milwaukee County’s

<sup>1</sup> Workforce ages 45-65+ as of 2015. Source: Wisconsin Department of Workforce Development; Milwaukee Workforce Development Area – Long Term Projections; 2-12-2022 – Most Openings. O\*NET OnLine.

<sup>2</sup> Economic Modeling Systems International (EMSI); 2015.4 – QCEW Employees, Non-QCEW Employees, and Self-Employed; 2015-2025; Milwaukee County

population. The city's demographics have changed dramatically over the past decade and it has become majority-minority with a younger population and higher rate of entry into the workforce than the seven county Southeastern Wisconsin region as a whole. The city posts a higher ratio of workforce entry to exit as well as larger percentages of young and prime working age residents, suggesting that the city represents the future of the seven county Southeastern Wisconsin workforce.<sup>3</sup>

From an unemployment rate and low-income perspective, several other Milwaukee County municipalities, including portions of St. Francis, Glendale and Brown Deer, typically trend above county averages for unemployment. Program staff continually evaluates labor market information and employment recruitment opportunities to determine communities and neighborhoods throughout the county that may benefit from targeted outreach for workforce services.

### **3. Describe how these needs were identified.**

Employ Milwaukee assessed and identified workforce investment needs using labor market information and data collected from the Wisconsin Department of Workforce Development Office of Economic Advisors, Economic Modeling Systems International (EMSI), Wanted Analytics, and the U.S. Census Bureau. Additionally, Employ Milwaukee convened community stakeholder meetings whereby subject matter experts, including employers, service providers, and economic development agencies, provided recommendations for serving adults, youth, and persons with disabilities.

## **B. Labor Market Information**

### **1. Provide an analysis of the regional economic conditions including –**

- a. Existing and emerging in-demand industry sectors and occupations (data will be compiled from the Quarterly Census of Employment and Wages, Occupational Employment Survey, and long-term Industry and Occupational Projections with formatted tables provided in Fall 2015) and**

***Industry Sector Labor Market Information:*** In Milwaukee County, almost every industry has shown annual job growth, except for the manufacturing and financial and insurance sectors, which experienced multiple mass layoffs between 2011-2014, but still have strong growth in subsectors, especially those linked to regional economic clusters.

- Total jobs in all NAICS subsectors increased by 9,191, or 1.9 percent, between 2011 -2014.<sup>4</sup>

<sup>3</sup> Source: City of Milwaukee. *Growing Prosperity: An Action Agenda for Economic Development*. September 2014

<sup>4</sup> Source: Wisconsin Department of Workforce Development; WDA 2 LMI Databook; Longitudinal Employer-Household Dynamics (LEHD), Quarterly Workforce Indicator (QWI).

- Private sector jobs showed a healthier increase of 2.1 percent.<sup>4</sup>
- Construction jobs increased by 245; a 2 percent growth in 2014.<sup>5</sup>
- Manufacturing jobs lost 1,226 jobs for a 2 percent decrease overall; however, the food, plastics and rubber, beverage and tobacco, apparel, paper, furniture and related products subsectors had substantial job growth, up to 103 percent growth.<sup>5</sup>
- Education and Health Service jobs continued a steady increase as well, up 7,132 jobs or 8 percent, with the greatest increase in the total number of jobs coming from services for the elderly and persons with disabilities, which added 8,379 jobs with a 110 percent growth change.<sup>5</sup>
- The finance and insurance sector experienced a decrease of 2,456 jobs (9 percent decrease), mostly due to several mass layoffs by companies associated with the subsectors of insurance, real estate credit, and trust, fiduciary, and custody activities.
- Employers with the most current entry level job openings (requiring a high school diploma) are in the healthcare and hospitality industries.<sup>6</sup>

Employ Milwaukee analyzed labor market information to identify target industries based on a variety of factors including overall growth rates, high growth rates in key subsectors related to regional economic clusters, high quantity of total jobs, family-supporting median wages, and existence of entry- and mid- level jobs connected to career pathways. Although some industries have experienced decreased growth in the past three years, such as manufacturing and finance and insurance, the total number of jobs is still so large that it could be difficult to fill vacant positions created by the older, retiring incumbent workforce.

The private sector industries that employ the most workers in Milwaukee County and meet the criteria above are health care and social assistance (NAICS 62), manufacturing (NAICS 31-33), construction (NAICS 23), retail trade (NAICS 44), accommodation and food service (NAICS 72), and finance and insurance (NAICS 52). (Employ Milwaukee combines retail trade and accommodation and food service into one industry named “hospitality.”) Each industry has 10 year projected growth, with exception of manufacturing and finance and insurance; however, as stated previously, each have high growth subsectors linked to regional economic clusters.

**Table 2** provides Workforce Development Area 2 (WDA 2) long term industry projections for the time period 2012-2022, which demonstrates that high growth industries (and/or industries with a large total amount of jobs) include healthcare, manufacturing, hospitality, construction, and financial services.

<sup>5</sup> Source: *Economic Modeling Systems International (EMSI); 2015.4 – QCEW Employees, Non-QCEW Employees, and Self-Employed; 2011-2014; Milwaukee County.*

<sup>6</sup> Source: *Wanted Analytics. March 6, 2016*

<b>Table 2: Workforce Development Area – Long Term Industry Projections, 2012-2022</b>				
<b>WDA 2 : Milwaukee County</b>				
			<b>Change (2012-2022)</b>	
<b>Industry</b>	<b>2012 Employment*</b>	<b>2022 Projected Employment</b>	<b>Employment</b>	<b>Percent</b>
<b>Total All Industries</b>	<b>504,198</b>	<b>532,738</b>	<b>28,540</b>	<b>5.66</b>
<i>Goods-Producing</i>	69,112	68,456	-656	-0.95
Natural Resources and Mining	*	*	*	*
Construction	*	*	*	*
Manufacturing	53,695	52,656	-1,039	-1.94
<i>Services-Providing</i>	405,752	434,303	28,551	7.04
Trade, Transportation, and Utilities	77,422	80,181	2,759	3.56
Information	9,193	9,093	-100	-1.09
Financial Activities	32,864	35,744	2,880	8.76
Professional and Business Services	74,457	84,055	9,598	12.89
Education and Health Services	125,242	136,851	11,609	9.27
Leisure and Hospitality	45,011	46,659	1,648	3.66
Other Services (except Government)	14,902	15,424	522	3.50
Government, excluding Post Office, Education and Hospitals	26,661	26,296	-365	-1.37
<b>Self Employed and Unpaid Family Workers, All Jobs</b>	<b>29,334</b>	<b>29,979</b>	<b>645</b>	<b>2.20</b>
Source: Information is derived using annual 2012 QCEW unpublished data from the US Bureau of Labor Statistics and Current Population Survey data from the US Census Bureau was also used. To the extent possible, the projections take into account anticipated changes in Wisconsin's economy from 2012 to 2022. It is important to note that unanticipated events may affect the accuracy of these projections. *Due to confidentiality, data is suppressed and so detail may not add to totals.				

**Table 3** includes construction industry projections that were not available through state data, as well as a further breakdown by industry subsector to show growth within manufacturing and finance and insurance.

The construction sector is projected to grow by 19 percent between 2012 and 2022, adding 2,227 jobs within Milwaukee County. Downtown Milwaukee is experiencing unprecedented growth and development, highlighted by a new National Basketball Association (NBA) arena for the Milwaukee Bucks, which will be a springboard for an additional \$540 million of retail, hospitality, and healthcare development. Northwestern Mutual Life is constructing two high rise buildings and multiple other hotels, apartments, and retail developments are in the works.

Relative to manufacturing, the Milwaukee 7 Regional Economic Development Partnership and local economic development leaders took a deeper look at opportunities for the region's long-term prosperity by aligning the region's identified assets with the top regional export driver industries. Utilizing national and



international best practices, nearly 300 industry groups were studied and 47 location factors evaluated. Through the strategic planning process, research, and competitive analysis, leading clusters were identified that offer the best potential for growth, expansion and global attraction. Three of the identified clusters were in the manufacturing sector: Energy, Power & Controls, Food & Beverage Manufacturing, and Water Technologies, identified specifically because they export goods and services outside of the region and hold a strong market share<sup>7</sup>. **Table 3** below shows a strong correlation between these economic clusters and growth within manufacturing subsectors.

The financial services industry in Milwaukee County is very strong, despite several mass layoffs in the past three years. This sector is dominated by commercial banking and direct life insurance carriers, which hold over 40% of all jobs. The location quotient, which quantifies how concentrated a particular industry is in a region as compared to the nation, is extremely high for Direct Life Insurance Carriers at 5.77, indicating that Milwaukee county is a national leader in this subsector largely due to Fortune 500 firm Northwestern Mutual Life Insurance, which is headquartered in downtown Milwaukee.

<sup>7</sup> Source: *Milwaukee 7 Framework for Economic Growth, January 2014*

**Table 3: Milwaukee Workforce Development Area  
Long Term Industry Projections with Subsectors 2012-2022  
WDA 2: Milwaukee County**

Industry	2012 Employment	2022 Projected Increase	Change	
			Employment	Percent
<b>23 – Construction</b>	11,633	13,860	2,227	19%
<b>31 – Manufacturing</b>	54,074	-6,786	47,288	-13%
334517 – Irradiation Apparatus Manufacturing	1,836	2,324	488	27%
333131 – Mining Machinery and Equipment Manufacturing	1,187	1,607	420	35%
326199 – All Other Plastics Product Manufacturing	1,166	1,587	421	36%
311812 – Commercial Bakeries	811	1,212	401	49%
312120 – Breweries	808	1,119	311	38%
333612 – Speed Changer, Industrial High-Speed Drive, and Gear Manufacturing	1,085	1,099	14	1%
325510 – Paint and Coating Manufacturing	734	1,010	276	38%
321920 – Wood Container and Pallet Manufacturing	384	779	395	103%
334510 – Electromedical and Electrotherapeutic Apparatus Manufacturing	638	711	73	11%
311412 – Frozen Specialty Food Manufacturing	355	701	346	97%
<b>52 – Finance and Insurance</b>	27,852	25,715	-2,137	-8%
524113 – Direct Life Insurance Carriers	5,180	6,251	1,071	21%
522110 – Commercial Banking	5,430	5,933	503	9%
523930 – Investment Advice	896	1,376	480	54%
523920 – Portfolio Management	521	1,005	484	93%
524292 – Third Party Administration of Insurance and Pension Funds	660	797	137	21%
522130 – Credit Unions	649	682	33	5%

Source: Economic Modeling Systems International (EMSI); 2015.4 – QCEW Employees, Non-QCEW Employees, and Self-Employed; 2012-2022; Milwaukee County.

**Occupational Labor Market Information: Table 4** identifies the top 10 in-demand growth occupations in Milwaukee County.

<b>Table 4: Milwaukee Workforce Development Area – Long Term Occupational Projections, 2012-2022 WDA 2: Milwaukee County</b>							
Rank	Occupation				Wage		
	SOC Code	SOC Title	Percent Change (2012-2022)	Average Annual Total Openings	Entry Hourly	Experienced Hourly	Median Annually
	<b>00-0000</b>	<b>Total, All Occupations</b>	<b>5.66</b>	<b>14,949</b>	<b>\$9.76</b>	<b>\$29.42</b>	<b>\$36,268.00</b>
<b>1</b>	29-1141	Registered Nurses	12.56	450	\$26.04	\$36.47	\$67,843.00
<b>2</b>	13-2011	Accountants and Auditors	5.73	158	\$22.69	\$38.40	\$63,874.00
<b>3</b>	11-1021	General and Operations Managers	6.93	148	\$24.22	\$71.82	\$94,636.00
<b>4</b>	41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	12.43	146	\$16.75	\$38.10	\$55,870.00
<b>5</b>	43-1011	First-Line Supervisors of Office and Administrative Support Workers	7.42	139	\$16.34	\$31.19	\$52,100.00
<b>6</b>	53-3032	Heavy and Tractor-Trailer Truck Drivers	7.23	136	\$13.61	\$22.26	\$37,365.00
<b>7</b>	25-1071	Health Specialties Teachers, Postsecondary	25.07	118	*	*	\$117,282.00
<b>8</b>	49-9071	Maintenance and Repair Workers, General	6.58	111	\$11.52	\$21.66	\$36,343.00
<b>9</b>	23-1011	Lawyers	10.91	88	\$28.20	\$76.61	\$112,776.00
<b>10</b>	13-1161	Market Research Analysts and Marketing Specialists	29.49	85	\$16.58	\$34.96	\$55,445.00
<p>Source: Information is derived using May 2014 OES Survey and annual data 2012 QCEW. Unpublished data from the US Bureau of Labor Statistics, CPS and US Census Bureau was also used. To the extent possible, the projections take into account anticipated changes in Wisconsin's economy from 2012 to 2022. It is important to note that unanticipated events may affect the accuracy of these projections. Source: Office of Economic Advisors, Wisconsin Department of Workforce Development, September 2015</p>							

**Table 5** provides additional occupational information for Employ Milwaukee's high demand industry sectors including O\*NET skills requirements, educational requirements, and a range of entry-, mid-, and high-skill occupations to showcase entry-level opportunities for job seekers, as well as advancement opportunities for incumbent workers along a career pathway.

**Table 5: Career Pathway Occupation Labor Market Information**

<b>Industry</b>	<b>SOC Code and Title</b>	<b>Typical Education for Entry</b>	<b>Related Occupational Work Experience</b>	<b>O*NET Skills Requirements</b>
<b>Healthcare</b>	29-1141 Registered Nurses	Associate's Degree	None	Active Listening Social Perceptiveness Service Orientation Speaking Coordination Monitoring
	39-9021 Personal Care Aides	Less than high school	None	
<b>Manufacturing</b>	51-2092 Team Assemblers	High school diploma or equivalent	None	Coordination Monitoring Quality Control Analysis Active Listening Critical Thinking Speaking Management of Personnel Resources
	51-1011 First-Line Supervisors of Production and Operating Workers	Post-secondary non degree award	Less than five years	
<b>Hospitality</b>	35-3021 Combined Food Preparation and Serving Workers, Including Fast Food	Less than high school	None	Active Listening Service Orientation Speaking Coordination Monitoring Persuasion Negotiation
	41-2031 Retail Sales	Less than high school	None	
<b>Construction</b>	47-2061 Construction Laborers	Less than high school	None	Active Listening Coordination Operation Monitoring Reading Comprehension Social Perceptiveness Speaking Complex Problem Solving
	47-2031 Carpenters	High school diploma or equivalent Apprenticeship	None	
<b>Financial Services</b>	43-4051 Customer Service Representatives	High school diploma or equivalent	None	Active Listening Speaking Service Orientation Reading Comprehension Critical Thinking Mathematics Social Perceptiveness Writing
	13-2011 Accountants	Bachelor's degree	None	

Source: Information is derived using May 2014 OES Survey and annual data 2012 QCEW. Unpublished data from the US Bureau of Labor Statistics, CPS and US Census Bureau was also used. To the extent possible, the projections take into account anticipated changes in Wisconsin's economy from 2012 to 2022. It is important to note that unanticipated events may affect the accuracy of these projections. Office of Economic Advisors, Wisconsin Department of Workforce Development, September 2015.

**b. The employment needs of employers in those industry sectors and occupations (data will be compiled from DWD labor exchange sources such as the Job Center of Wisconsin and Help Wanted Online in formatted tables and may be supplemented by the market intelligence of WDB Business Services staff)**

**Table 6** identifies top skills and certifications requested by employers through real-time job posting information. Although there are industry-specific skills and certifications, there are common skills and certifications that cut across all industries including quality assurance, driver’s license, basic life support, and the knowledge and ability to use software systems and technology.

<b>Table 6: Top Employer Skill and Certification Needs by Job Posting</b>			
<b>Industry</b>	<b>Employers Hiring</b>	<b>Top Skills</b>	<b>Top Certifications</b>
<b>Healthcare</b>	Aurora Health Care, Inc. Froedtert Health Wheaton Franciscan Healthcare Milwaukee Center for Independence Extendicare	Electronic Medical Record (EMR) Systems Behavioral Health Medicaid Quality Assurance (QA) Geriatrics	Certified Registered Nurse (RN) Basic Life Support (BLS) Certification in Cardiopulmonary Resuscitation Driver’s License Certified in Nursing Administration
<b>Manufacturing</b>	Johnson Controls, Inc. Harley Davidson General Electric Rockwell Automation	Quality Assurance (QA) Quality control Motion control Computer Aided Design (CAD) Enterprise Resource Planning Software	Occupational Safety Food safety programs Driver’s license Certified Public Accountant (CPA) HAZMAT
<b>Hospitality</b>	Marcus Hotels and Resorts Aurora Health Care, Inc. Pizza Hut Columbia St. Mary’s KFC	Food preparation Quality control Pharmacy Benefit Management Electronic Medical Record (EMR) systems Quality Assurance (QA)	Driver’s license Basic Life Support Certified Registered Nurse Food safety programs Automotive Service Excellence
<b>Construction*</b>	City of Milwaukee TradeCORE Milwaukee County We Energies Master Lock Company	Preventative maintenance inspections Electrical systems Preventative maintenance Motion control Lean manufacturing	Driver’s license Commercial Driver’s License (CDL) National Electrical Code Occupational safety Journeyman Plumber
<b>Financial Services</b>	Northwestern Mutual BMO Harris U.S. Bank Aurora Health Care, Inc. PNC Financial Services	Medicaid Structured query language (SQL) Anti-money laundering (AML) Quality Assurance (QA) Bank Secrecy Act (BSA)	Certified Registered Nurse (RN) Continuing Education Driver’s license Basic Life Support Nationwide Mortgage Licensing System
Source: Wanted Analytics; March 6, 2016 *Construction occupations may be underrepresented in online job posting data.			

2. **Provide an analysis of the knowledge and skills needed to meet the employment needs of the employers in the region, including employment needs in in-demand sectors and occupations (data will be compiled from (a) and (b) and will include common skills and educational requirements as defined in O\*Net)**

**Table 5** (on previous page above) includes O\*NET skills requirement for a selection of occupations in Employ Milwaukee’s targeted industry sectors. The information shows a pattern of two overarching skills necessary for workers to keep and advance in their jobs: 1) The ability to use technology and 2) Interpersonal skills such as active listening, social perceptiveness, speaking, coordination, monitoring, critical thinking, problem solving, and service orientation (customer service).

**Table 7** below depicts the educational requirements for the top 100 jobs in Milwaukee County in Employ Milwaukee’s targeted industries. The data demonstrates that there are numerous access points into each industry sector, with most requiring an Associate’s degree or less. The hospitality, construction and manufacturing sectors provide the greatest opportunity for individuals that have obtained a high school diploma (i.e. 84 percent of top jobs in hospitality, 80 percent of top jobs in construction, and 65 percent of top jobs in manufacturing require a high school diploma or less).

<b>Educational Requirements</b>	<b>Healthcare</b>	<b>Hospitality</b>	<b>Manufacturing</b>	<b>Finance</b>	<b>Construction</b>
Less than High School	10%	36%	12%	12%	20%
High School Diploma	27%	48%	53%	41%	60%
Some College	2%	1%	-	1%	-
Post-Secondary, Non Degree	10%	3%	4%	2%	6%
Associates	11%	-	5%	4%	2%
Bachelors	21%	11%	26%	39%	12%
Masters	11%	-	-	-	-
PhD	8%	-	-	1%	-

Source: Economic Modeling Systems International (EMSI); 2015.3 – QCEW Employees, Non-QCEW Employees & Self-Employed - EMSI 2015-2025

3. **Provide an analysis of the workforce in the region, including current labor force employment (and unemployment) data, and information on labor market trends and the educational and skill levels of the workforce in the region, including individuals with barriers to employment. (Regional economists will provide a series of formatted tables and graphs describing these trends at the WDA and state levels.**

**This data will be compiled from the Local Area Unemployment Statistics program and will be supplemented with data from the U.S. Census Bureau and other sources.)**

**WDB leadership must review and incorporate the provided material in order to assess the climate in which the WDB operates prior to inclusion in the local plan. Regional economists will also be available to assist in the creation of any narrative analysis incorporated to support the data elements provided.**

The Workforce Innovation and Opportunity Act (WIOA) identifies a range of local populations that may have barriers to employment. Employ Milwaukee recognizes that

many of its residents may experience difficulty gaining and maintaining employment without employment and training related services. The Milwaukee County WDA 2 plan outlines many ways these individuals may receive supportive services.

Following are groups within the larger Milwaukee county population that may face more significant barriers to employment and therefore require special services such as those provided under WIOA. Among these groups are individuals with disabilities, veterans, and the incarcerated population. Each of these groups experience unemployment rates that are significantly higher than that of the general population. They also represent vital resources that the WDA 2 will need to utilize in order to help counteract the workforce quantity challenges.

**Low Income:** There are 203,926 individuals in Milwaukee county (21.9% of total Milwaukee County population) that are considered low-income, as defined by earning less than 125% of the federal poverty level wage. There are 170,943 individuals in the city of Milwaukee (29.4% of total city of Milwaukee population) that are considered low-income, as defined by earning less than 125% of the federal poverty level wage. The poverty level of some zip codes in Milwaukee is as high as 49.6% (53206).<sup>8</sup>

**Low Educational Attainment Levels:** One out of every three students in the inner city of Milwaukee does not graduate high school, evidenced by an average graduation rate of 33.28%.<sup>8</sup> By comparison, the average rate in the state of Wisconsin is 88.6%, and the national average is 83.83%.<sup>9</sup>

**Youth with Barriers to Employment:** As of July 17, 2014, there were 502 youth aging out of foster care in Milwaukee County, according to the Wisconsin Department of Children and Families. Youth employment levels are low in Milwaukee County, where 26.7% of young adults aged 16-19 are unemployed and 15.24% of young adults aged 20-24 are unemployed. Employment levels are even lower in the city of Milwaukee, where 30.7% of young adults aged 16-19 are unemployed and 16.9% of young adults aged 20-24 are unemployed. In 2013, the Milwaukee County Delinquency and Court Services Division indicated that 1,382 court-involved youth reside in the city of Milwaukee.

**Incarcerated Individuals and Ex-Offenders:** In April of 2010, when the U.S. Census Bureau conducted its decennial count of Wisconsin residents, it found 12.8% (or 1 in 8) of African American working age men were behind bars in state prisons and local jails. This rate of mass incarceration is the highest for African American men in the country and nearly double the national average of 6.7% (or 1 in 15). Wisconsin Department of Corrections records show incarceration rates at extremely high levels for African American males in Milwaukee County. Over half of African American men in their 30s and half of men in their early 40s have been incarcerated in state correctional facilities.<sup>14</sup>

**Long Term Unemployed:** 10.5% (78,076) of Milwaukee County residents are unemployed and 13.1% (59,680) of city of Milwaukee residents are unemployed. The

<sup>8</sup> Source: U.S. Census Bureau, 2010-2014, American Community Survey 5-Year Estimates

<sup>9</sup> Source: U.S. Department of Education SY 2013-14 Four Year Regulatory Adjusted Cohort Graduation Rate, by State

unemployment rate in some zip codes in the city of Milwaukee is as high as 28.7% (53206).

**Homeless Individuals:** Milwaukee County has the highest number of homeless in the entire state of Wisconsin. As of 2012, there were 6,685 documented homeless individuals, of whom 1,770 were children, 1,663 women, and 3,252 men. This was almost double the number of the next highest county (Dane County – 3,450).<sup>10</sup>

**Immigrants:** The city of Milwaukee has a significant immigrant population with 9.9% of the city’s residents foreign-born, compared to 7.1% of the seven county Southeastern Wisconsin’s population and 4.6% of the state of Wisconsin’s population. Of the 381,446 households in Milwaukee County, 3.6% (13,732) include individuals with whom no one age 14 or over speaks English only or speaks English “very well.” At an average household size of 2.44, this equates to 33,506 individuals. Of the 230,181 households in the city of Milwaukee, 4.5% (10,358) include individuals with whom no one age 14 or over speaks English only or speaks English “very well”. At an average household size of 2.53, this equates to 26,205 individuals.<sup>11</sup>

**Individuals with Disabilities:** There are 122,926 individuals with disabilities living in Milwaukee County (13.0%), and 82,652 individuals with disabilities in the city of Milwaukee (13.9%), compared to 646,635 individuals in the state of Wisconsin (11.4%).<sup>11</sup>

**Veterans:** There are 280,556 veterans in Milwaukee County. 10,398 or 3.7% are unemployed or not in the labor force.<sup>12</sup>

**Table 8** provides an overview of the educational attainment of Milwaukee County residents. A majority of residents have at least a high school diploma (84.9 percent) and almost 50 percent have some college or an Associate’s degree, indicating an opportunity to connect residents to middle-skill employment opportunities.

<b>Table 8: Educational Attainment, Milwaukee County Residents</b>		
Educational Attainment	Aged 18-24	Aged 25 and over
Less than High School	16.1%	14.1%
High School Diploma	26.3%	29.2%
Some College or Associate’s	47.1%	-
Some College	-	21.3%
Associate’s Degree	-	7.2%
Bachelor’s Degree	10.5%	18.2%
Graduate or Professional Degree	-	9.9%

Source: Office of Economic Advisors, Wisconsin Department of Workforce

**4. Describe any WDA specific labor market characteristics not reported in 1.a. and b.**

<sup>10</sup> Source: State of Wisconsin Department of Administration-Division of Housing. Annual Report, 2012.

<sup>11</sup> Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.

<sup>12</sup> Source: Wisconsin Department of Workforce Development. Office of Economic Advisors. 2015.



Employ Milwaukee's service area is Milwaukee County (population 947,735), which includes the city of Milwaukee (population 594,833). The city of Milwaukee comprises 62.8% of Milwaukee County's population. The city's demographics have changed dramatically over the past decade and it has become majority-minority with a younger population and higher rate of entry into the workforce than the seven county Southeastern Wisconsin region as a whole. The city posts a higher ratio of workforce entry to exit as well as larger percentages of young and prime working age residents, suggesting that the city represents the future of the seven county Southeastern Wisconsin workforce.<sup>13</sup>

### **C. Assessment of Current Workforce Investment Activities in the Local Area**

- 1. Provide an analysis of the type and availability of workforce development activities for adults and dislocated workers, including education and training, in the local area. This analysis must include the strengths and weaknesses of workforce development activities and capacity to provide workforce development activities to address the education and skill needs of the workforce, including individuals with barriers to employment, and the employment needs of employers. Describe plans to address any weaknesses identified. [§108(b)(1)(D)]**

Employ Milwaukee has a mix of private, local, and federal funding that it currently invests in the workforce development and educational systems to support adults and dislocated workers, as well as those with barriers to employment. Employ Milwaukee is connected to an extensive network of partners and stakeholders that includes over 2,000 employer relationships, employer consortiums, and economic development organizations, along with government, labor, education, job-training, social service, community-based groups, and faith-based groups.

Employ Milwaukee's workforce activities include job placement and recruitment, subsidized employment opportunities, workforce training, and adult education programs for individuals with greater barriers to employment. Those barriers include English literacy, high school equivalency, driver education, basic computer skills, career assessment, job readiness, and more.

Employ Milwaukee's strong system partnerships is one of its greatest strengths. Even so, successfully serving employer and job seeker customers requires sustained collaboration and coordination over the long term, as well as a continued focus on continuous improvement. Employ Milwaukee continues to drive improvement in the area of performance setting and monitoring. As it moves toward greater collaboration, so does the need to develop performance goal setting and program analysis that can be shared with system partners who provide services within the core programs. Employ Milwaukee's long term goal is to create an environment where all programs are outcome-driven, with established benchmarks and routine monitoring. Employ Milwaukee plans to work with the State Department of Workforce Development and the One-Stop Center(s) to implement and provide oversight on the Common Application

<sup>13</sup> Source: City of Milwaukee. Growing Prosperity: An Action Agenda for Economic Development. September 2014.

process to enhance seamless collaboration, coordination, and re-assessment of Milwaukee County’s workforce talent pool.

**2. Provide a description and assessment of the type and availability of youth workforce investment activities in the local area including activities for youth who are individuals with disabilities. This description must include an identification of successful models of such activities being used and/or planned. [§108(b)(9)]**

Employ Milwaukee has successfully implemented a multi-tiered, comprehensive approach in individualized youth assessment, providing education, training, and employment services by integrating core WIOA services with supporting services, and enhancing service approaches by co-enrolling eligible youth in other successful workforce based programs as outlined in **Table 9**. Please note that the table is not all-inclusive, as Employ Milwaukee is continually developing its capacity to serve individuals by expanding its programs and partnerships.

<b>Table 9: Employ Milwaukee Youth Workforce Investment Activities</b>	
<b>Workforce Investment Program</b>	<b>Program Description</b>
Career Plus (WIOA ISY)	Planning for and supporting career pathways, as well as employing a variety of strategies to connect students to the world of work.
WIOA OSY	Assists youth and young adults ages 16 to 24, preparing them for employment, career pathways, trainings and further education.
Career Plus Youth Apprenticeship Consortium	Seeks to build capacity and increase integration of work-based learning opportunities in high-demand industry sectors.
YouthBuild	Prepares young adults for careers and employment in the construction industry while providing classroom-based GED instruction.
Earn and Learn Program	Provides youth and young adults with a specialized, entry-level, six-to-eight-week work experience.
Transform Milwaukee Foster Care	Provides subsidized work experience, placement and follow up for youth aging out of foster care.
Making Milwaukee Work for Youth	Assists court-involved youth to overcome barriers to employment, enhance their employability in high growth sectors, create upward mobility on career pathways, and encourage their personal development that makes long-term employment and community participation achievable goals.

Employ Milwaukee collaborates with the DWD Division of Vocational Rehabilitation (DVR) to enroll youth with Disabilities in the Earn & Learn Program. Follow up referral service is provided to youth who are assessed for learning disabilities. Crucial to this success is the competitive process used in selecting providers who have an established track record of serving youth with workforce barriers. Employ Milwaukee has instituted a five step process for serving youth with a strong emphasis on individualized assessment, sector based job training in leading industries, youth apprenticeship and pre-apprenticeship opportunities, placement, and follow-up services. Providers are required to comply with the five-part implementation process.

Existing youth services will be enhanced to create to industry sector strategies; this employer centered needs-approach will enhance youth services by giving youth unique

and direct access to private sector employer opportunities in Employ Milwaukee's five targeted growth industries of construction, financial services, healthcare, hospitality, and manufacturing. With enhanced youth services around industry sectors, employers will be able to access a wider pool of qualified out of school youth and offer internship opportunities for in-school youth.

**3. Describe the strategy to identify business requirements within the local area and provide support in meeting their needs. [§682.320]**

Employ Milwaukee created and staffed a Business Services team to better engage and formalize relationships with employers, and to implement the business services-related aspects of WIOA. Ongoing plans include the enhancement and expansion of industry sector and career pathway efforts, which are a driving force behind business service efforts. To date, Employ Milwaukee has secured memberships with several area Chambers of Commerce (e.g. South Suburban, Greenfield, West Allis-West Milwaukee, Wauwatosa, etc.) whereby Business Services team members have access to employers, economic development professionals, business improvement district personnel and local government officials. Monthly meetings and events provide staff with opportunities to educate employers regarding candidate recruitment and hiring event services, job fairs, on-the-job training and pre-apprenticeship programs, labor trends-projections and internship programs. Staff can also refer employers to workforce partner programs and job candidates. Employers in turn provide staff with real-time demand data by industry, sector and occupation which can be used to identify potential placement candidates, arrange for recruitment fairs or make referrals to available apprentices.

A primary strategy to identify business requirements is the deliberate inclusion of business leadership on industry-led sector partnerships to ensure that appropriate input is incorporated into workforce planning activities, and that these requirements are driven by solid labor market information.

Employ Milwaukee supports employer needs by undertaking the following strategies:

**Access:** Encouraging more employers, across business size and industry sector, to engage with the workforce system to meet their respective short- and long-term needs.

**Alignment:** Align members of the Business Services team under guidance from the State to ensure that businesses are being served by the American Job Center of Wisconsin brand, and services are organized and synchronized.

**Accountability:** Improve services by measuring effectiveness and responsiveness to employers, and monitoring and integrating information provided by Salesforce and other tools with matching functions to link employers and job candidates for timely filling of positions.

**Growth:** Continuously improve services by developing a consistent protocol to learn from and respond to business needs in a real-time feedback loop that includes traditional labor market information and employer surveys. This initiative, called the

“Talent Pipeline Needs Assessment,” will be implemented as the data integration protocol becomes more complete.

**4. Provide a description and assessment of the type and availability of services available to employers in the local area.**

The services offered to employers vary depending on the business need as defined by them, but standard services include labor exchange services, such as recruitment and screening services to on-board new employees, rapid response and layoff assistance, customized job fair recruitment, education and training support, and provision of labor market information.

Employ Milwaukee provides a range of options to support work-based training that can include subsidizing employer costs, including on-the-job training, customized training, incumbent worker training, and registered apprenticeships. These activities make up a larger strategy to strengthen industry partnerships and career pathways for job seekers. In particular, Employ Milwaukee plans to provide more activities that lead to recognized post-secondary credentials, apprenticeship certificates, bridge components, and stackable credentials. It are also working to complete a mapping of career pathways in key industries and to conduct industry assessments to guide its sector strategies.

**II. Vision and Workforce Development Area Goals**

**A. Provide a description of the Board's strategic vision and goals for preparing an educated and skilled workforce including youth and individuals with barriers to employment. Include goals relating to the performance accountability measures based on primary indicators of performance in order to support regional economic growth and economic self-sufficiency. [§108(b)(1)(E)]**

Employ Milwaukee’s vision is to build skills employers seek, improve job quality and career advancement, and increase system and policy coordination. It recognizes that the current and projected needs of the entire workforce investment system must consider the needs of job seekers, incumbent workers, youth, and businesses. To prepare Milwaukee’s workforce over the long term, Employ Milwaukee is implementing the following four key strategies for WIOA implementation, as identified in the State WIOA Combined State Plan:

- 1) Sector partnerships
- 2) Career pathways
- 3) Cross-program data coordination
- 4) Job-driven investment

**Sector Partnership:** Employ Milwaukee has established Industry Advisory Boards (IABs) to expand sector strategies and to better address employer and job-seeker talent requirements across five high-growth sectors: construction, financial services, healthcare, hospitality, and manufacturing. A “Talent Pipeline Needs Assessment” initiative has been launched which will integrate traditional labor market information with employer surveys and interviews in a real-time feedback loop. Active engagements with employers will be

staged to include more local businesses as the data-integration system becomes more complete.

Sector partnerships are closely aligned with the K-12 school systems and technical college system to develop flexible and responsive career pathways for both youth and adults. This will provide workers multiple entry and exit steps along the career ladder and cultivate a continuous talent pipeline for employers.

**Career Pathways:** Career Pathways and Sector Partnerships are two inter-related strategies that will enable Employ Milwaukee to develop the skills that employers need and cultivate a more robust talent pipeline for employers. By undertaking these strategies, Employ Milwaukee anticipates the ability to increase program capacity by reducing duplicative services, building programs at greater scale, and leveraging the efficiencies created by a stronger alignment of system resources. In particular, career pathways offer many bridges and stackable credentials for a broad spectrum of job seekers looking for career progression, while linking other work-based learning approaches such as pre-apprenticeship, registered apprenticeships, and many on-the-job training programs that meet industry demands.

**Cross-Program Data Coordination:** The coordination of program data will help align WIOA services and performance measures across the system, allow for more informed decision-making, and improve the jobseeker experience. Employ Milwaukee is currently implementing a system-wide technology platform that integrates the customer management tools and resources that track jobseeker and business customer activity. This platform will also house the “Talent Pipeline Needs Assessments,” described above. A coordination of cross-program data will enable Employ Milwaukee to leverage and integrate the deep industry knowledge, business customer base, and specialized business services already established and offered by its system partners.

**Job Driven Investment:** Employ Milwaukee’s priority is to prepare and link workers to jobs that are currently available or will emerge in high-growth industries. To achieve this goal, it will continue to refine its employer engagement strategy and improve its data management platform to disseminate labor market information and employer feedback throughout the system, balancing labor supply and demand.

**B. Describe strategies to work with the entities that carry out the core programs that align resources available to the local area to achieve the strategic vision and goals described in II.A. [§108(b)(1)(F)]**

Employ Milwaukee’s talent development system is designed to respond to employer needs by drawing on strong partnerships between workforce, economic development, and education providers. Its implementation plan to improve cross-program strategies among core programs includes integrating the input provided by its Board, respective leadership teams, and system delivery partners. Additionally, it is exploring the development of a communication channel to effectively respond to activities and recommendations made by any talent development and planning committees established by the State to improve alignment among core programs, One-Stop partner programs, and other resources that reflect regional plans, strategies, and

priorities. Employ Milwaukee's goal is to build innovative workforce solutions that support economic development strategies.

Employ Milwaukee has moved to functionalize these strategies through Memorandum of Understanding (MOUs) with its system partners. A One-Stop Operator (OSO) has been selected through a competitive procurement process. During this procurement and selection process, Employ Milwaukee articulated responsibilities, including the coordination of One-Stop partners and service providers. Subsequent MOUs with associated partners will establish goals and guidelines around academic and career planning, and the provision of services, while also identifying which career services are best performed among partners.

**C. Describe the measures the WDB will use to track progress toward these goals.**

Employ Milwaukee currently measures and evaluates the outcomes associated with workforce investment activities. This includes measuring the increase in employment, retention, and earnings of participants, and the attainment of recognized post-secondary credentials by participants. Further, Employ Milwaukee will measure and evaluate employer engagement and rate market responsiveness and business customer satisfaction. It will also track progress against goals for business development activities such as the number and type of business served, the number of positions filled, the time required to fill a job vacancy and other appropriate measures.

**D. Describe the process used to develop your area's vision and goals, including participants in the process, especially focusing on how industry sector partnerships will be utilized.**

Employ Milwaukee undertook a planning process with key stakeholders throughout the workforce system to establish its priorities, goals, and strategies. Participants in this process included and will continue to include employers, economic development practitioners, and workforce development and education partners.

Employ Milwaukee established the Coordinating Council, a consortium of major training and social service providers in Milwaukee County, to develop the vision for and effectively manage the county's labor supply of job seekers. The Coordinating Council is subdivided into three active subcommittees (i.e. Youth service, Faith-based organizations and Community based practitioners) where discussions and action plans can address job seeker needs and recruitment opportunities.

Employ Milwaukee established Industry Advisory Boards (IABs) to identify employer demand by sector and occupation and to efficiently coordinate job seeker recruitment and training opportunities. Employ Milwaukee is utilizing industry partnerships in five high-impact sectors which are formalized as IABs, and it plans to align these sector partnerships more closely with the public school and technical college system to develop flexible and responsive career pathways for both youth and adults. This will provide workers multiple entry and exit steps along the career ladder and cultivate the talent pipeline for employers.

**E. In order to achieve the goals identified above, implementation strategies need to be developed. Describe the strategies the WDB will use to achieve the WDA's vision and goals for the local area.**

Employ Milwaukee is implementing the following strategies to achieve area goals and vision:

- 1) ***Continue to refine sector strategies and improve and coordinate business services to support employers.*** This will be achieved through the Business Services team’s employer outreach activities as well as structured sector-based demand conversations with IAB members. Coupled with the ongoing analysis of labor market information and industry-occupation forecasts, local sector strategies will be refreshed to meet employer demand.
- 2) ***Build stronger partnerships with industry to develop a talent pipeline that drives economic and community prosperity and helps low-income families and individuals advance economically.*** The “Talent Pipeline Needs Assessment” initiative is an important component that will help identify and catalog business requirements.
- 3) ***Work with system partners to align workforce development and education programs and resources.*** Educational partners (K-12 and higher education) and training providers are invited participants of the IABs and the Coordinating Council.
- 4) ***Collaborate to implement cross-program strategies to ensure there are “no wrong doors” for job seekers who navigate the talent development system.*** Employ Milwaukee is developing plans with the recently procured One-Stop Operator (OSO) to enhance coordination of the provision of direct services among partners and the formalize of these cross-program strategies.

### **III. Governance and Structure**

#### **A. Plan Input and Review Process**

1. **Describe the process used, in accordance to the five criteria below, to provide an opportunity for public comment and input into the development of the local plan.**

**To provide adequate opportunity for public comment, the Local Board must:**

- a. **Make copies of the proposed local plan available to the public through electronic and other means, such as public hearings and local news media;**

A public notice for Employ Milwaukee’s local plan was placed in the Daily Reporter, in addition to an electronic version of the plan placed on its website. The Public Notice can be found in Attachment A.

- b. **Include an opportunity for comment by members of the public, including representatives of business, labor organizations, and education;**

In development of the local plan, Employ Milwaukee held community stakeholder focus groups around six topical areas: Youth, Adult/Dislocated Workers, Persons with Disabilities, IABs, Economic Development, and Financial Literacy. The local plan

was available for comment from all persons and organizations during the 30-day comment period.

- c. **Provide no more than a 30-day period for comment on the plan before its submission to the Governor, beginning on the date on which the proposed plan is made available, prior to its submission to the Governor;**

The 30-day period for comment on Employ Milwaukee's local plan began on March 9, 2016, and ended on April 9, 2016.

- d. **The Local Board must submit any comments that express disagreement with the plan to the Governor, along with the plan, the WDB's response to those comments, and a copy of the published notice; and**

Employ Milwaukee reviewed comments received during the public review and comment period, incorporating some of the input received. Comments that expressed disagreement with the plan were submitted with the plan to the Governor. Comments expressing disagreement with the plan can be found in Attachment B.

- e. **Consistent with WIOA section 107(e), the Local Board must make information about the plan available to the public on a regular basis through electronic means and open meetings.**

Employee Milwaukee engaged in the public comment process according to the criteria stipulated above. The approved plan is posted publicly on Employ Milwaukee's website. Meetings of the local board and its committees are open to the public, with meeting materials posted on the Employ Milwaukee website.

2. **Describe how local workforce partners were involved in the development of the WDB's local plan. Also describe how local partners will be involved in the ongoing implementation of the local plan.**

Employ Milwaukee undertook a planning process with key stakeholders throughout the workforce system to establish priorities, goals, and strategies, as previously described. Participants in this process included, and will continue to include: employers, economic development, workforce development, and education partners. The implementation of the local plan will continue to rely on input from members of IABs, the Coordinating Council, and representatives from local and regional economic development organizations. Employ Milwaukee ensures continued implementation of the local plan by involving all key participants through planning sessions, working group meetings, and the sharing of labor market data.

## **B. Chief Elected Official(s) (CEO)**

1. **Describe the role of the CEOs in the governance and implementation of WIOA in the local area. In local areas consisting of more than one unit of government, describe the decision making process between the local elected officials. If this is addressed in a**



**WDB/CEO Agreement, please state that it is included in that Agreement and provide the section where it can be found.**

The role of the CEO in the governance and implementation of WIOA in the local area can be found in the WDB/CEO Agreement, Attachment C. Employ Milwaukee's Chief Elected Official (CEO) is City of Milwaukee Mayor Tom Barrett. In May, 2017 the Mayor addressed the Intergovernmental Cooperation Council (ICC) on the status of workforce activities and outcomes in WDA 2. The ICC is comprised of the local municipal government leaders from Milwaukee County. The ICC has subsequently asked for periodic status reports from Employ Milwaukee regarding program outcomes and workforce services available to job seekers and employers within each municipality. The ICC members are also presently discussing a CEO Consortia agreement to define workforce development roles and responsibilities within WDA 2.

- 2. Section 683.710(b)(2) states that when a local workforce area is composed of more than one unit of general local government, the liability of the individual jurisdictions must be specified in a written agreement between the CEOs. Please provide this document or specify its location, if it is within another document.**

A CEO Consortium Agreement is not required for WDA 2, per direction from the Wisconsin Department of Workforce Development (DWD). However, as of June 2017, the ICC is presently discussing the merits of developing a CEO Consortia agreement.

- 3. Please submit a WDB/CEO Agreement and/or the CEO Consortium Agreement.**

The WDB/CEO Agreement can be found in Attachment C.

#### **C. WDB Functions**

- 1. Describe any roles and responsibilities, as agreed to with the CEO, which may differ or be in addition to those specified in the Act and regulations. Please identify where these responsibilities are listed in the WDB/CEO Agreement.**

Employ Milwaukee's WDB/CEO Agreement can be found in Attachment C. Section II (Scope) of the 6<sup>th</sup> Modified Agreement states that "the Agreement shall govern and apply to job training and employment programs under WIOA and such other programs as may be mutually agreed upon." Section III (Duties) identifies the roles and responsibilities of the Mayor, the Local Board and Employ Milwaukee.

- 2. Identify the fiscal agent or entity responsible for the disbursement of grant funds. If a fiscal agent is used, attach the current contract and identify who has signatory authority. Submit the WDB/Fiscal Agent Agreement.**

Employ Milwaukee is the Fiscal Agent. Language identifying it as the Fiscal Agent can be found in the WDB/CEO Agreement, Attachment C, recital 3A.

#### **D. WDB Composition**

**The Governor shall, once every two years, certify one local board for each local area in the State. Such certification shall be based on criteria established under section 107(b), and for a second or subsequent certification, the extent to which the local board has ensured that the workforce investment activities carried out in the local area have enabled the local area to meet the corresponding performance accountability measures and achieve sustained fiscal integrity. For PY15, DWD issued Administrator's Memo 15-05 which details the requirements that must be met for certification of a local board. A WIOA compliant board must be in place by December 31, 2015.**

**For the following questions, if the response is provided in the CEO Consortium Agreement, the WDB/CEO Agreement or in the WDB By-Laws, indicate which agreement the description can be found in and the section where it is stated. If not included in any of these documents, provide the response below:**

**1. Describe the nomination and selection process used to appoint local business representatives to the WDB.**

The nomination process used to appoint local business representatives to the WDB can be found in Attachment H: WDB By-Laws; Section 2.3.b. The CEO receives nominations from the local business community, chambers of commerce, and civic organizations, from which individuals are selected to represent industries and employment sectors of interest to the WDA. The CEO, in cooperation with the Employ Milwaukee President/CEO and Board Chair, reviews candidates to determine level of capacity and interest in serving the workforce development interests of the workforce development area. The CEO seeks to ensure the Board membership reflects both demographic and economic diversity of the area, in addition to complying with the Board composition requirements outlined in WIOA.

**2. Describe how the Board will provide a leadership role in developing policy, implementing policy, and oversight for the local workforce investment system.**

The Board, through its Standing Committees (i.e. Program Committee, Personnel & Finance Committee and Executive Committee), meets with Employ Milwaukee staff and leadership each quarter to discuss policy, performance, outcomes and budget. The Board plays and will continue to play a strong leadership role by focusing on strategic planning, policy development, and oversight of the local workforce investment system. This includes developing and approving a budget for the purpose of carrying out the duties of the Board, and coordinating workforce investment activities with economic development strategies and other employer linkages.

**3. Identify the circumstances that constitute a conflict of interest for, or any matter that would provide a financial benefit to a Board member, a member's immediate family, or a representative entity. Include actions to be taken by the Board or Board member in the event of a conflict of interest. If this question is addressed in your conflict of interest policy, state what section(s) contain the response. Submit the WDB's conflict of interest policy. [ §107(h)(1 & 2)]**

Employ Milwaukee's Conflict of Interest Policy can be found in Attachment F.

**4. Provide a complete and current WDB membership list.**

Employ Milwaukee's current WDB membership list can be found in Attachment E.

**5. Attach a diagram, description of roles and responsibilities, and regular meeting schedule of the WDB and subcommittees.**

Employ Milwaukee's Board and sub-committee meeting schedule can be found in Attachment G. The WDB By-Laws (Attachment H) provide a detailed summary of the role and function of the Board and its sub-committees.

**6. Describe how the WDB ensures that meetings and information regarding WDB activities are accessible to the public (including persons with disabilities). [§107(e)]**

Employ Milwaukee's Board and sub-committee meetings are publicly noticed in accordance with the State open meetings laws. Board and sub-committee meetings are held at Employ Milwaukee's office, which meets state and local accessibility standards for persons with disabilities. In the event meetings take place at another location, Employ Milwaukee staff ensures full access to the public, including persons with disabilities.

**7. Describe the process the WDB will use to notify the CEO of any vacancies and to fill those vacancies with appropriate representatives.**

Employ Milwaukee's By-Laws establish that Board members are appointed to three year terms. Those terms are staggered to ensure continuity of operations and leadership. Annually, Employ Milwaukee staff formally notifies the CEO and Board Chair of upcoming terms and works with the CEO to ensure re-appointments or new appointments are made in a timely manner. In the event a Board member chooses to resign from the Board, a formal letter of resignation is requested and the vacancy is communicated to the CEO, along with appropriate information relative to the seat and whether it is a private sector or mandated partner position.

**8. Attach the Workforce Development Board By-Laws including date adopted/amended. The by-laws must comply with the parameters listed in Admin Memo 15-05.**

Employ Milwaukee's By-Laws can be found in Attachment H.

**E. Youth Standing Committee**

**WIOA eliminates the requirement for Local Boards to establish a youth council; however, the Local Board may choose to establish a standing committee to provide information and to assist with planning, operations, and other services to youth, which must include community-based organizations (CBOs) with a demonstrated record of success in serving eligible youth. Additionally, an existing youth council may be designated as the youth standing committee if they are fulfilling the requirements of a standing committee which**

**means that they have members of the Local Board who have the appropriate experience and expertise in youth educational and workforce development.**

**The youth standing committee must include a member of the Local Board as the chair, members of CBOs with a demonstrated record of success in serving eligible youth and other individuals with appropriate expertise and experience who are not members of the Local Board. The committee may also include parents, participants, and youth.**

**If local boards choose not to delegate this function to a standing youth committee, they are responsible for conducting oversight of youth workforce investment activities under WIOA section 129(c). Boards that choose not to have a standing youth committee must respond to question 5. For those questions that do not apply to your WDB, please answer "Not Applicable".**

**1. Describe the role and responsibilities of the Standing Youth Committee.**

Employ Milwaukee has appointed two WDB members to the Standing Youth Committee, which has now become part of the Employ Milwaukee Coordinating Council.

The Standing Youth Committee consists of representatives from each of WIOA youth service providers and other youth service organizations that have a demonstrated record of success in serving eligible youth ages 16-24 in the areas of education, life skills, and/or employment related activities. The Standing Youth Committee's purpose will be to assess the needs of the youth populations as they relate to future workforce preparation, and to encourage the coordination of services, activities, and support that will enable youth to successfully attain their career goals. The Standing Youth Committee will make policy recommendations for and assist in the oversight and accountability of WIOA supported youth programs.

**2. Describe how the Standing Youth Committee is involved in developing policy.**

The Standing Youth Committee supports Employ Milwaukee in developing policy by recommending innovative approaches that enhance the program design and implementation of youth services. In addition, the Standing Youth Committee makes recommendations on the most cost effective, seamless, integrated approach to leveraging community resources for WIOA-eligible youth and other youth served by Employ Milwaukee and its partners through the Coordinating Council. The Standing Youth Committee is a partner in making recommendations for leveraging community resources, coordinating resources among schools and community-based organizations, and other policy areas that relate to the youth population.

**3. Identify circumstances that constitute a conflict of interest for Standing Youth Committee members and describe how codes of conduct and conflict of interest issues related to Standing Youth Committee members will be addressed. If this question is addressed in your conflict of interest policy, state what section(s) contain the response. Submit the conflict of interest policy.**

Employ Milwaukee's Conflict of Interest Policy (Attachment F) applies to members of the Standing Youth Committee.

- 4. Describe how the Standing Youth Committee conducts oversight with respect to eligible providers of youth services in the local area and their role in provider selection.**

The Standing Youth Committee recommends ways to coordinate youth services, recommends eligible youth service providers, provides ongoing leadership and support for continuous quality improvement for local youth programs, and assists with planning and other issues relating to the provision of services to youth.

**The following is applicable only to local boards that choose not to establish a standing youth committee:**

- 5. Describe how the local board will conduct oversight of youth workforce investment activities under WIOA section 129(c).**

Not Applicable.

#### **F. WDB Support and Administration**

- 1. If the WDB employs staff, identify the number of staff (time percentage), general role, and as part of what structure/organizational entity. Indicate whether or not this same entity has staff that provides direct WIOA services. Submit the WDB Staff Agreement and/or job description for WDB Director.**

Employ Milwaukee is a 501(c)3 non-profit corporation and is structured to serve as the local WDB for WDA#2. Employ Milwaukee does not typically employ staff to provide WIOA Title I Adult, Dislocated Worker, Youth out-of-school (OSY) or Rapid Response services. However, for Program year 2016, Employ Milwaukee did provide direct Youth in-school (ISY) services through its Career Plus program. For Program Year 2017, Employ Milwaukee will also provide direct Rapid Response services.

Employ Milwaukee serves as the administrative agent for federal WIOA funds as well as local workforce planning, leadership, coordination, and monitoring as required by WIOA. WIOA Title I services, other than those listed above, are provided through local sub-contracts and partner agencies. Employ Milwaukee currently employs 76 full- and part-time employees. Employ Milwaukee's Job Description for Chief Executive Officer can be found in Attachment I.

- 2. Include an organizational chart with an 'effective as of date' of WDB staff, administration and support.**

Employ Milwaukee's Organizational Chart can be found in Attachment J.

- 3. Provide a copy of the Administrative Entity/Fiscal Agent's organizational chart with an 'effective as of date'.**

Employ Milwaukee's Administrative/Fiscal Entity Agents organizational chart can be found in Attachment J.

**4. Attach a copy of the WDB's current Cost Allocation Plan.**

Employ Milwaukee's current Cost Allocation Plan can be found in Attachment K.

**5. Describe and submit the WDB's cash management policy and procedures.**

Employ Milwaukee's Cash Management Policy can be found in the Fiscal Manual, Attachment L, pages 6-11.

In accordance with 2 CFR 200.305(b), Employ Milwaukee exercises draw and payment processes which mitigate the possibility of excessive time lapses between receipt of funds and disbursement.

Employ Milwaukee receives both cost reimbursement grants and those that allow for advance funds. For those that require drawdowns of advance Federal funds, draws will be made in accordance with the following guidelines and the procedures defined throughout this Cash Management section:

- 1) Drawdown of funds will be made as close as possible to actual expenditure of funds.
- 2) Monitoring of the fiscal activity (drawdowns and payments) under each grant will be completed on a continuous basis.
- 3) Cash flow of each grant project will be carefully reviewed before each drawdown by both the Accounting Manager and the CFO.

Due care will be exercised to ensure that funds will not be drawn in advance of actual expenditures or encumbrances known to be due more than one week post receipt of drawn funds.

**6. Is an Indirect Cost Rate or de minimis rate of 10% used?**

Employ Milwaukee elects the use of 10 % De Minimis for Indirect Costs

The Indirect Cost Pool will include all operational costs that were not readily identifiable in relational proportional benefits to individual grants or cost objectives through direct charging. In addition, the Indirect Cost Pool will also include those costs from the Administrative Staffing Costs that were not readily identifiable to grants.

At the end of the accounting period the 10% De Minimis indirect cost rate will be applied to all applicable grants. This ensures that the proper allowed amount of the 10% De Minimis is charged to each fund to include the relational staffing costs. The 10% De Minimis will be charged based on the Modified Total Direct Costs of each grant. This

base excludes all rent costs, capital expenditures, equipment, participant support costs, and the portion of each sub-award in excess of \$25,000. Other items may be excluded as necessary to avoid a serious inequity in the distribution of costs with the approval of the cognizant agency. There are currently no such additional excluded costs for Employ Milwaukee.

The related amount for the application of the 10% De Minimis will be expensed to each grant/funding source through a journal entry debiting such grant and crediting the Indirect Cost Pool. Any remaining balance in the Indirect Cost Pool fund, whether over or under, will be cleared to a corporate account at the end of the fiscal year.

**7. Describe fee for service(s) activities, and how the funds are accounted for. Submit the WDB's local policy regarding fee for services.**

Employ Milwaukee does not provide any Fee for Service work effort at this time.

**8. Employee health and welfare costs incurred in accordance with local board policies are allowed for the improvement of working conditions, employer-employee relations, employee health, and employee performance are allowable (2 CFR 200.437). Submit the WDB's policy for the provision of these costs for WDB staff.**

Employ Milwaukee's Employee Health and Welfare Costs Policy and Incentive Compensation Policy can be found in the Employee Handbook, Attachment D, pages 14-32.

**9. Incentive compensation to employees based on cost reduction, or efficient performance, suggestion awards, safety awards, etc., is allowable (2 CFR 200.430). Provide the WDB's policy for incentive compensation to employees and/or service provider staff.**

Employ Milwaukee makes every effort to comply with guidelines set forth in the expenditure of federal grant funds. Certain types of costs may be allowable under federal law but may only be allowable under certain circumstances and conditions.

Incentives, as defined by 2 CFR 200, may be provided to Employ Milwaukee personnel only if the overall compensation is determined to be reasonable (as defined in 2 CFR 200.430(b)) and such costs are paid or accrued pursuant to an agreement entered into in good faith between Employ Milwaukee and the employee before the services were rendered, or pursuant to an established plan followed by the non-Federal entity so consistently as to imply, in effect, an agreement to make such payment. Employ Milwaukee's Incentive Compensation Policy can be found in Attachment D, Employee Handbook, pages 10-11.

**10. Submit the WDB's personnel policies and procedures**

Employ Milwaukee's Employee Handbook can be found in Attachment D.

#### IV. One-Stop System and Service Delivery

##### A. One-Stop Service Delivery

- 1. Describe the One-Stop delivery system in your local area, including the roles and resource contributions of one-stop partners. [§121(a)] Include a list of the comprehensive One-Stop Centers and the other service locations in your job center network. Use attached Form D.**

Employ Milwaukee's One-Stop System seeks to operationalize the Governor's vision for the state One-Stop System, as stated in the WIOA Combined State Plan. The one-stop delivery system shall provide a "one stop" at which any employer, worker or job seeker may enter into the aligned resources and programs of the talent development system. The local job center system (JCS) shall provide electronic access into the available resources in an integrated manner. Programmatic and evaluation results provide partners and elected officials with data to ensure continuous improvement of system activity.

A One-Stop Operator (OSO) for the American Job Centers in WDA 2 was selected through a competitive procurement process in PY16. The selected OSO for PY17 is Maximus. During this procurement and selection process, Employ Milwaukee articulated responsibilities, including the coordination of One-Stop partners and service providers. Subsequent MOUs with associated partners will establish goals and guidelines around academic and career planning, and the provision of services, while also identifying which career services are best performed among partners.

Locations of the One-Stop Service Delivery System in WDA 2 are listed on Form D.

- 2. Is each of the required WIOA partners included in your One-Stop delivery system? Describe how they contribute to your planning and implementation efforts. If any required partner is not involved, explain the reason. [§121(b)]**

All required WIOA partners are included in the One-Stop delivery system in WDA 2. Where feasible, these partners are co-located to provide ease of access to services dependent on the need of the individual customer. Employ Milwaukee establishes formal partnerships through MOUs, or other formal agreement, to ensure full participation from each One-Stop partner. Through these agreements, each partner will contribute to planning and implementation efforts. Periodic review of service delivery will assess the effectiveness of each partner's individual contribution and the system as a whole.

- 3. Identify non-required partners included in the local One-Stop delivery system.**

There are currently no non-required partners in the local One-Stop delivery system. As an element of Employ Milwaukee's process of continuous quality improvement, Employ Milwaukee and the selected OSO will evaluate the value of adding program partners to enhance the effectiveness of the system.



- 4. Describe how entities within the one-stop delivery system, including one-stop operators and one-stop partners, will comply with Section 188 and the Americans with Disabilities Act regarding physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing needs of individuals with disabilities. Describe how the WDB incorporates feedback received during consultations with local Independent Living Centers regarding compliance with Section 188 of WIOA.**

In accordance with WIOA, Employ Milwaukee, as a sub-recipient that extends WIOA funds to other entities, includes equal opportunity, nondiscrimination, and civil rights compliance language in sub-contracts and monitors and assure the compliance of its sub-contractors. Funded sub-recipients are provided with the WIA-WIOA Policy Manual. The Manual, also referred to as the *Workforce Programs Guide*, provides guidance on state policy, as issued by the Wisconsin Department of Workforce Development – Division of Employment and Training (DET). The Manual applies to all grantees receiving WIA-WIOA Title 1 funds, whether funds are extended directly or indirectly from DET. Grantees and sub-grantees are required to establish written policies and procedures to comply with all applicable portions of the Guide.

Additionally, equal opportunity nondiscrimination and civil rights compliance on-site monitoring reviews of WIOA funded sub-recipients are conducted annually by Employ Milwaukee and the DWD- DET Equal Opportunity Officer to determine the extent to which funded recipients and their subcontractors are meeting the civil right compliance obligations set forth in Section 188 and applicable equal opportunity and nondiscrimination statutes.

Employ Milwaukee requires American Job Centers in WDA 2 to complete self-assessments of programmatic and physical accessibility, prior to an onsite visit by the Employ Milwaukee Legal Affairs Coordinator, who verifies information in the self-assessment.

During the Local Plan development process, Employ Milwaukee held a stakeholder convening for Persons with Disabilities. Stakeholders, including a representative from the local Independent Living Center, were invited to provide input about the local plan. Feedback received during stakeholder convenings was incorporated into the drafting of the WIOA Local Plan.

- 5. Describe the WDB's policies and procedures for resolving grievances or complaints filed by participants and other interested parties affected by the local workforce system, including one-stop partners and service providers.**

Employ Milwaukee provides a copy of its grievance procedure, based on the template provided in the DWD Workforce Programs Guide, to program operators, program applicants, and program participants. The process for submitting a complaint, along with the timeline for investigating it, its informal resolution, any appeal, and final decision are detailed. Complaints involving Employ Milwaukee or sub-contractor staff, issues

between Employ Milwaukee and program operators, issues between two or more program operators, and issues involving Employ Milwaukee's operations are to be filed directly with Employ Milwaukee. Complaints that allege discrimination and complaints alleging incidents of fraud and abuse are to be submitted to the appropriate Federal or State agency whose addresses and contact information are listed. All locations where Employ Milwaukee programs are provided have a Notice of Grievance Procedure publically posted indicating the above information. All program participants are provided a copy of the grievance procedure and sign an acknowledgement that they received it. The WIOA Grievance Policy and Procedures can be found in Attachment W.

- 6. Helping veterans obtain training and employment is the responsibility of all Job Center staff. The local Job Center must provide priority of service to all veterans and eligible spouses to ensure that the full range of employment and training services are provided in a comprehensive, customer-driven, and seamless manner. Describe processes in place at the point of entry to the system to identify veterans and eligible spouses who are entitled to priority of service (including signage and/or designated areas and staff training). Submit any implementing policies or procedures describing how priority of service is implemented uniformly and appropriately across the local workforce system.**

Employ Milwaukee ensures that information on Veterans Priority of Service is posted throughout Job Centers in WDA 2. At the point of contact in Job Centers, customers are asked about their enlistment, veteran and veteran's spouse status. These questions are captured on the Employ Milwaukee Common Intake Tool used in job centers and during program registration.

If a customer is actively enlisted, or if they are a veteran or veteran's spouse, they are then administered the DWD-DET-Office of Veterans Services Employment Services Pre-Screening tool. If a veteran or veteran's spouse meets the definition of a veteran or spouse with a significant barrier to employment, the customer is promptly referred to local Disabled Veterans Outreach Program (DVOP) staff.

Employ Milwaukee's Veterans Priority of Service Policy is located in Attachment N.

- 7. Please list which career services are provided by which partners to job seekers and employed workers.**

**Table 10** illustrates the menu of services that is generally provided by OSO staff and that can be expanded upon based on a determination by staff that individualized career services are appropriate to obtain or maintain employment. Employ Milwaukee maintains an extensive service provider list to help program participants access a full array of individualized career services.

<b>Table 10: Menu of Services</b>	
<b>Services</b>	<b>Partners</b>
Determine whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs.	One-Stop system partners and Job Service staff will refer to appropriate programs.
Outreach, intake (including identification through the state's Worker Profiling and Reemployment Services system of unemployment insurance claimants likely to exhaust benefits), and orientation to other services available through the One-Stop delivery system.	One-Stop system partners, including Job Service.
Assessment of skill levels including literacy, numeracy, and English-language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs.	One-Stop system partners and/or educational partner.
Labor exchange services, including Job search and placement assistance, and, when needed by an individual, career counseling.	One-Stop system partners, including Job Service.
Provision of referrals to and coordination of activities with other programs and services, including those within the one-stop delivery system and, when appropriate, other workforce development programs.	One-Stop system partners, including Job Service.
Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas.	One-Stop system partners, including Job Service.
Provision of performance information and program cost information on eligible providers of training services by program and type of providers.	One-Stop system partners and/or Job Service; referrals to appropriate contracted program staff for additional cost details.
Provision of information about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's one-stop delivery system.	Information provided by the Wisconsin Department of Workforce Development is made available through One-Stop system partners.
Provision of information relating to supportive services or assistance, as well as appropriate referrals, including: child care; child support; medical or child health assistance; benefits under the Supplemental Nutrition Assistance Program (SNAP); Earned Income Tax Credit; housing counseling and assistance services sponsored through the U.S. Department of Housing and Urban Development (HUD); and assistance under the state program for Temporary Assistance for Needy Families (TANF); and other supportive services and transportation.	One-Stop system partners and/or Job Service; referrals to appropriate contracted program staff for additional program details.
Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA.	One-Stop system partners, including Job Service; referrals to appropriate educational service providers for details.
Provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals seeking assistance in filing a claim.	One-Stop system partners.

**8. Describe the strategy to identify business requirements within the local area [682.320]. In addition, describe the business services available to area employers through the One-Stop system, and who provides these services. Provide details about any fee-for-service business services.**

Employ Milwaukee has established Industry Advisory Boards (IABs) in five industry sectors: construction, financial services, healthcare, hospitality, and manufacturing. These IABs provide Employ Milwaukee with current business requirements within each sector and inform data collection and analysis strategies for other industry sectors. Employer feedback augments the extensive labor market information that Employ Milwaukee routinely analyzes.

A One-Stop Operator (OSO) for the American Job Centers in WDA 2 was selected through a competitive procurement process in PY16. During this procurement and selection process, Employ Milwaukee articulated responsibilities, including the coordination of One-Stop partners and service providers.

Required Business Services to be provided through the One-Stop:

- Appropriate recruitment and other business services on behalf of employers, including information and referrals to specialized business services other than those traditionally offered through Job Centers.
- Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including –
  - Job vacancy listings in labor market areas
  - Information on job skills necessary to obtain the vacant jobs listed
  - Information relating to local occupations in demand and the earnings, skill requirements and opportunities for advancement for those jobs.
- No fee may be, nor shall be, charged for the above required services.

Optional Business Services which may be provided:

- Customized screening and referral of training participants
- Customized services on employment-related issues
- Customized recruitment events including targeted job fairs
- Human resource consultation services
- Customized labor market information for specific employers, sectors, industries, or clusters
- Other similar customized services.

A “Collabor8 Milwaukee Team” was formed in 2014 and has evolved to serve as the place where partners’ Business Services teams exchange business intelligence and other information. Collabor8 Milwaukee meets monthly and is co-chaired by Employ Milwaukee and Job Service staff. In addition to Employ Milwaukee and DWD’s Job Service, other partners include DVR, OVS, MATC, M7, WEDC, BAS and WRTP/BIG STEP. The objectives of the Collabor8 Milwaukee Team are to identify shared business services issues with business services colleagues in other organizations to avoid

needless duplication of efforts, exchange information about business needs and continually maintain partnership among participating organizations.

At this time, there are no fee-for-service business services. However, Employ Milwaukee may consider this service structure at a later date.

- 9. Describe how "center-based" business services are provided. This description should include how all programs that conduct business services are included in the system and the coordination practices; and how input and feedback from all partners is received and implemented equitably.**

Employ Milwaukee's Business Services team implements IABs, cultivates workforce development strategies to support sector partnerships, and builds a labor market data sharing framework to support these activities. The Business Services team coordinates with WIOA Job Development staff, Job Service Business Unit staff, and other area job development entities. A great emphasis is placed on the alignment of services and the elimination of duplicative services.

- 10. Describe actions taken by the WDB to promote maximum integration of service delivery through the One-Stop delivery system for both business customers and individual customers. Attach any local policies or procedures in support of this.**

Employ Milwaukee maximizes coordination and improves cross-program strategies by integrating input provided by its Board, leadership teams, and working group members. Additionally, it is exploring the development of a communication channel to effectively respond to activities and recommendations made by any talent development and planning committees established by the State to improve alignment among core programs, one-stop partner programs, and other resources that reflect regional plans, strategies, and priorities.

Collabor8 Milwaukee partners seek to be the single point of contact for businesses. Each organization's Business Services staff is informed of partners' resources and capacity and connects businesses to the appropriate organization and contact person when needed or requested. This reduces duplication of services, but also improves the reputation of the workforce system with business partners as a smooth, interconnected system with a single Business Services staff person serving as their navigator.

Employ Milwaukee articulates responsibilities for the coordination of One-Stop partners and service providers and integration of service delivery in the contract with the selected OSO.

- 11. Describe how the WDB will ensure the quality of service delivery and continuous improvement throughout the One-Stop Centers.**

Employ Milwaukee requires quality programming and continuous improvements from all of its One-Stop partners, including the OSO, by implementing the following procedures:

- 1) Conducting formal and informal monitoring of service providers, which help to maintain a high level of service for customers;
- 2) Meeting with leadership teams of the One-Stop partners to plan, integrate when necessary, and discuss on-going service delivery changes that are necessary for improving the customer experience.

**12. Describe how the WDB facilitates access to services provided through the local delivery system, including remote areas, through the use of technology and through other means. [§108(b)(6)(B)]**

Employ Milwaukee currently facilitates access to services through its current American Job Center locations: Job Center Central (Maximus), 4201 N. 27<sup>th</sup> St.; Milwaukee Southeast Job Center (UMOS), 2701 S. Chase Avenue; and YWCA Southeast Wisconsin Job Center, 1915 N. Dr. Martin Luther King, Jr., Drive. These locations serve the Central, Southern, and Northern portions of the WDA and are open to program participants and the general public in Milwaukee County. Another affiliate AJC location is presently being discussed for the America Works of Wisconsin team to provide Title I Adult and Dislocated Worker services. As of June 28, 2017, an office location at the Milwaukee Area Technical College (MATC) “Walkers Square” campus (816 W. National Avenue) is being considered. The location will be operational for the start of Program Year 2017.

The use of JobCenterofWisconsin.com by WDA 2 partners provides an effective tool by which customers and staff can interact and work together from various locations. WDA 2 is primarily urban in nature with a public transportation system that reaches out to the communities within the WDA 2. However, the lack of a regional public transit system and a majority of regional jobs in the suburban areas often create a barrier to employment for WDA 2 residents who do not have access to a car or a valid driver’s license. Employ Milwaukee maintains a network of community-based organizations and program partners to promote an effective service delivery system to address barriers to transportation.

**13. Describe the connection between the local board WIOA Youth Program and the Job Center service delivery system.**

The workforce system has numerous points of entry for young job seekers, including the WDA’s American Job Centers. The Employ Milwaukee Resource Center, Milwaukee Public Schools, MATC, and other community based organizations serving youth and families are other points of connecting young job seekers to the workforce system. Employ Milwaukee’s Resource Center provides a menu of resources, including self-directed career exploration, basic personality and work style assessment, financial aid information, resume creation, typing instruction, and basic computer literacy. WIOA-eligible youth are referred from these points of entry to service providers that operate the WIOA Youth Program.

**14. Describe the WDB's activities/actions with local partners to ensure the development and implementation of common intake for all Resource Rooms per State (to be**

**issued). Also include a description of how activities will be coordinated with other points of intake such as the Division of Vocational Rehabilitation.**

All new visitors of the One-Stop system resource room complete the Employ Milwaukee Program Intake Form, a WDA-wide customer form that includes: contact information; military, veteran and veteran spouse status; basic demographics; job and education history. The primary use of this information is to track individuals accessing the workforce system and the frequency with which they access the variety of services offered.

Employ Milwaukee will follow the state-issued guidelines regarding the implementation of the common intake for the resource rooms located at the Job Centers when they are issued. Employ Milwaukee and the leadership team of WIOA providers will review and make necessary changes to the intake process. The leadership team will continually adjust processes as needed to facilitate coordination amongst partners of the One-Stops, including DVR, to ensure proper access to customers, program co-enrollment, and regulatory compliance.

Employ Milwaukee may expand other Career Services, such as workshops and interactive financial/computer literacy tools to enhance jobseekers' employment search. This increased emphasis on long-term goals, in-demand occupations, the value of employer benefits, and other career resiliency elements at the Career Services level will create more opportunities for jobseekers to make informed choices about their future.

**15. Describe how the end result of the activities described in the previous question show reduced duplication of services for program participants; ease of program accessibility; and identification of gaps the partnership has to address.**

Employ Milwaukee believes that a shared intake process will result in less duplication, which will allow for more time to be focused on meeting customer needs. Employ Milwaukee's system partners are versed in implementing and modifying program access and protocols to accommodate customers. This level of consistency also enables staff to identify gaps that may need to be addressed. Potential gaps in programming can be addressed swiftly in a manner that serves partners and improves the experience of the common customer in job centers. Employ Milwaukee will monitor service delivery in the One-Stop Centers to confirm an effective and efficient use of resources through oversight of the WDB/OSO Agreement and the Job Center certification process.

**16. Describe activities to promote Job Center of Wisconsin (JCW), and address the following:**

The WIOA Implementation Concept Map (Attachment Z) identifies the one-stop delivery system for WDA 2 and identifies the activities that promote Job Center of Wisconsin.

**a. Any participant needs for computer literacy as part of a system improvement; and**

Job Service continues to staff the Resource Rooms at One-Stops and provides Basic Career Services at One-Stops. This includes general assistance with computer access to program systems, including the JobCenterofWisconsin.com (JCW).

- b. How the WDB is coordinating with workforce partners, including Veterans' Services staff, to ensure that JCW is the vehicle for posting job orders for optimal competition of job seekers and available candidates for employers of the job openings.**

Employ Milwaukee fully coordinates with other local, regional, and statewide workforce partners, including the Office of Veterans Services, to ensuring that JCW is utilized to its utmost potential in meeting the needs of job seekers and employers. The Employ Milwaukee Business Services team, IABs, Coordination Council, and other ad hoc committees convene on a regular basis to ensure that job posting information is communicated through JCW and shared through their networks of job seekers and employers.

- 17. Describe how Salesforce will be used to support and enhance JCW rather supplant JCW.**

JCW is the primary tool used in WDA 2 job centers for job seekers and business customers. JCW's redesign and enhancements have enabled easier access to workforce information. The redesign has allowed for previously underused features, such as labor market information and skills-oriented resume creation, to be end-user friendly and more utilized.

SalesForce is a useful customer relationship management (CRM) tool adopted by the Wisconsin Workforce Development Association (WWDA) to support and enhance the employer business intelligence gathered by WDB business services staff as part of the "Skills Wisconsin" grant initiative. As part of the grant, each local WDB was granted a 3-year Salesforce license for business services personnel. Salesforce has proven effective as a means of communication across and within workforce areas, e.g. chatter functionality.

Now that the Skills Wisconsin funding has been depleted and each WDB must pay annual license fees, the Department of Workforce Development (DWD) will be enhancing the JCW Business application to enable WDB business service personnel to gather, store and share employer business intelligence if they choose not to renew their Salesforce license. Employ Milwaukee will move to the JCW Business option in the summer of 2017 and maintain one Salesforce license in order to communicate with the DWD-DET Bureau of Apprenticeship Standards staff as required for the WAGE\$ grant initiative.

- 18. Briefly describe Information Technology (IT) systems in the local area, including:**

- a. Systems in place to assess and place job seekers (include all IT services owned or subscribed to).**



Assessment systems that are in place include testing for aptitude, achievement, career development inventories, and career interest, including TABE testing, Career Lockers, WorkKeys, and Prove It.

**b. Systems used for employer management (include all IT services owned or subscribed to).**

Systems used for employer management include Salesforce (as described above) and Efforts to Outcomes (ETO), a data collection and performance management system utilized by the agency to supplement the information collected in the state-mandated systems. Both tools contain customized attributes about employer partners and their business operations. They also help track and manage employer outreach, job applicant quality, placements, hiring practices, and employer participation in sponsored events such as job fairs and career days. Employ Milwaukee will also utilize JCW Business once the DWD staff completes system enhancements in 2017.

**c. Systems used to track participant services (include all IT services owned or subscribed to).**

The systems used to track participant services include ASSET (Automated System for Support of Employment and Training), JCW, and ETO.

**d. Coordination of local IT systems with Job Center of Wisconsin, ASSET, and other federally or state provided systems.**

ASSET and ETO data entry by Employ Milwaukee direct service staff or subcontracted staff ensures consistency and timely entry of all participant related data and their assigned activities. Case managers access the ASSET system to manage participant services, update case notes, record placement activities, and add credentials.

Local monitoring of both the ASSET system and the paper files on a regular basis ensure that information is recorded accurately and in a timely manner. Web Intelligence (WebI) reports on data entered into the ASSET system. Data entered into ETO by case managers is used for performance monitoring and comparison purposes against quarterly performance report data provided by DWD.

**e. Other systems the WDB is utilizing and the purpose of these systems.**

ETO is used for local reports and selected analysis of projected performance standard compliance. Job Center customer information received through the intake forms is entered into ETO. Through the utilization of the ETO software, partner staff and case managers are able to collect key demographic, baseline, and outcome information for each participant as they receive services. This is done through three main components within the software: demographics, assessments, and efforts. Once in the system, the information is used to make decisions regarding the progress of a participant while engaged in the services outlined in their Individual

Employment Plan (IEP) or Individual Services Strategy (ISS). Program managers also use this information to make relevant program and service delivery strategy changes.

ETO is also utilized to support the following monitoring activities: program data entry, desk reviews, in-depth review of billings containing benchmark achievements, and onsite monitoring, including trainee interviews, file review, staff interviews, and fiscal reviews. Employ Milwaukee uses the DWD's UI system to find current employment information on WIOA participants. This information is used to determine dislocated worker status and to determine income eligibility.

**f. The assessment process utilized to determine IT needs.**

Employ Milwaukee has conducted an assessment of the WDA's Information Technology (IT) needs for WIOA. The IT needs assessment addresses any problems by evaluating the current environment, identifying existing performance issues and future business needs, documenting business processes affected, performing a gap analysis, and producing a final report summarizing the findings and recommended performance improvements. Information technology needs are further determined based on WDB and staff input.

**B. Memorandum(s) of Understanding (MOUs)**

**The local board, with the agreement of the chief elected official, shall develop and enter into a memorandum of understanding between the local board and the one-stop partners which would be effective July 1, 2016. Due to the changes with enactment of WIOA, DET will be providing additional guidance to the WDB's to assist in the development of local MOUs. Thus, copies do not need to be submitted at this time. The local MOUs must be reviewed and approved by DET by June 30, 2016. The Local Plans for WDBs without an approved MOU will only be conditionally approved.**

Employ Milwaukee staff and the Chief Elected Official (CEO) developed a Memorandum of Understanding (MOU) between the local board and the one-stop partner(s) based on the guidance provided by DWD in order to meet the standards established in WIOA Section 121(c). Employ Milwaukee finalized the MOUs for local Job Centers following receipt of DWD's approval of the MOU language.

**C. One-Stop Operators (OSO)**

**1. Identify the current OSO in the local area and attach the current WDB/One-Stop Operator Agreement.**

Employ Milwaukee conducted a competitive procurement process for the One-Stop Operator in the spring of 2017. Maximus was selected following that to be the One-Stop Operator for WDA 2. The WDB/OSO agreement between Employ Milwaukee and Maximus is currently under legal review by both parties prior to being finalized for PY17.

**2. Describe how the WDB is preparing for the competitive process for OSO selection. Describe how market research, requests for information, and conducting a cost and price analysis were conducted as part of that preparation. [§121(d)]**

A One-Stop Operator (OSO) for the Job Centers in WDA 2 was selected through a competitive procurement process in PY16. Employ Milwaukee staff followed the state guidance to ensure that market research, cost, and price analysis is conducted and that the roles and responsibilities of each partnership are clearly identified in the agreement. The Job Center MOUs with all partners establish goals and guidelines around academic and career planning (ACP) and the provision of services, while also identifying which career services are best performed among partners.

**3. Roles and Responsibilities**

**a. Provide a description of the roles and responsibilities of the OSO(s) in the Comprehensive Job Center(s) and for service locations in the One Stop delivery system.**

The principal role and responsibility of the OSO is to coordinate the service delivery of required one-stop partners and service providers. The OSO ensure that customers can access services and activities of all required partners in at least one physical location in WDA 2. The OSO will also ensure all core and required programs maintain human and capital resources to adequately operate their functions during business hours and provide web-based online access to information about their services.

Core programs include: (1) WIOA Title I – Adult, Dislocated Worker, and Youth formula funds; (2) Adult Education and Literacy Act programs funded by the United States Department of Education; (3) Wagner-Peyser Act employment services funded by the United States Department of Labor; and (4) Rehabilitation Act Title 1 programs funded by the United States Department of Education.

Required partner programs are: (1) Career and Technical Education (Perkins); (2) Community Services Block Grant; (3) Indian and Native American programs; (4) HUD Employment and Training programs; (5) Job Corps; (6) Local Veterans’ Outreach Program; (7) National Farmworker Jobs program; (8) Senior Community Service Employment program; (9) Temporary Assistance for Needy Families; (10) Trade Adjustment Assistance programs; (11) Unemployment Compensation programs; (12) YouthBuild.

**b. If there are multiple operators and/or consortia, be specific as to what each agency's role is and which Job Centers are involved with each.**

Maximus is the sole One-Stop Operator for all WDA 2 Job Centers effective July 1, 2017.

**D. Certification and Continuous Improvement [§121(g)]**

**The state's certification policy has not yet been finalized by the state workforce board. Following its completion and issuance, please describe any additional criteria or higher**

**levels of service coordination than required in order to respond to labor market, economic, and demographic conditions and trends in the local area.**

Employ Milwaukee certified its Comprehensive Job Center, Milwaukee Central Job Center, through the Job Center Certification Checklist issued by DWD-DET in May of 2016. No additional criteria or higher levels of service coordination were required as part of this process in WDA 2.

The PY17 Job Center Self-Certification Checklist completed for Milwaukee Central Job Center is located in Attachment U.

## **V. Results-Driven Talent Development System**

**One of WIOA's principal areas of reform is to require States and local areas to plan across core programs. This reform promotes a shared understanding of the workforce needs within each State and local area and fosters development of more comprehensive and integrated approaches such as career pathways and sector strategies, for addressing the needs of businesses and workers. The expansion of sector strategies must continue in order to enhance and strengthen Wisconsin's economic vitality through addressing employer and job-seeker talent requirements. Sector partnerships implement effective coordinated responses and integrate resources to develop the talent and workforce needs of key industries of a regional labor market. Wisconsin's system must use labor market information as the basis to map and assess current sector activities; and regional sector partnerships are not defined by artificial boundaries. Rather, they are determined through labor market analysis. Business service teams will represent the one-stop system to offer a coordinated set of services through the inclusion of all WIOA stakeholders. Sector partnerships must be closely aligned with the education system to develop flexible and response career pathways.**

**1. Describe the local area's workforce development system, including identifying the programs included in the system, and how the WDB will work with the entities administering core programs and other workforce development programs to support alignment and provision of services, including the following:**

- PK-16 Council**
- Local Technical Colleges**
- Local University of Wisconsin Campuses**
- Regional Economic Development Entities**

Employ Milwaukee seeks to align current and future goals for programs and provision of services to the goals outlined in WIOA and the State of Wisconsin's WIOA Combined State Plan. A major emphasis of WIOA is improving coordination between the workforce investment, economic development, adult education, literacy, and vocational rehabilitation systems. Employ Milwaukee will draw on its strong partnerships with its Industry Advisory Boards (IABs), economic development partners, educational and training providers, and the Wisconsin Job Center system to create a results-driven talent development system.

Employ Milwaukee staff and leadership have active relationships at the local and regional levels. Employ Milwaukee has engaged in functional relationships with the Milwaukee County Economic Development department, the City of Milwaukee Department of City Development, the Milwaukee Economic Development Corporation, and the Milwaukee 7, as well as a number of community-based economic development organizations. A major focus of these partnerships is aligning regional talent resources with high-growth economic clusters, resulting in a stronger, more agile workforce, increasing the ability to retain, grow, and attract business to the area and to help identify and create workforce development strategies which position the WDA and broader region to compete in the local, regional, and global economy.

Employ Milwaukee has developed and promoted strategic partnerships with educational partners, including Milwaukee Public Schools (MPS), Milwaukee Area Technical College (MATC), and local colleges and universities. The input provided by MPS and MATC representatives on the WDB facilitates a relationship with educational partners to address and meet industry and sector demands for talent. In addition, many of the technical college and college/university courses are included in the Individual Training Account (ITA) list, enabling skill deficient Adult and Dislocated Worker clients to access these programs that lead to employment through their Individual Training Accounts (ITA).

- 2. Provide a description of how the WDB, working with entities to carry out core programs, will expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. Include how the WDB will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and improve access to activities leading to a recognized postsecondary credential including a credential that is an industry-recognized certificate or certification, portable, and stackable. [Section 108(b)(3)]**

Employ Milwaukee is strategically positioned to ensure expanded access to employment, training, education, and supportive service for eligible individuals, particularly eligible individuals with barriers to employment. Employ Milwaukee's talent development system is designed to respond to employer needs by drawing on strong employer partnerships between workforce, economic development, and education providers. Its implementation plan to improve cross-program strategies will maximize consumer choice with respect to education and career services. Employ Milwaukee is exploring the following activities as potential elements of its long term implementation strategy:

***Common Intake Policy:*** Develop a common intake policy to support use of the WDA-wide customer intake form to reduce duplication, gaps in services, and ensure that individuals with barriers to employment receive an informed choice and an accurate assessment of how they might be best served.

***Professional Development:*** Conduct training for job center staff, One-Stop partners, and other service providers to standardize intake, assessment procedures and available services. This will ensure seamless intake and equitable sharing of information across

the system. This includes working with the DWD to assess the effectiveness of providers on the Eligible Training Provider List (ETPL), strengthening performance standards, and when possible, recruiting new organizations to compete in the provision of services.

**Coordination:** Continue refining the coordination of services through co-enrollment with system partners including TANF, Adult Education and Literacy, Division of Vocational Rehabilitation (DVR), Trade Adjustment Assistance, and the FoodShare Employment and Training (FSET) programs for those individuals who are eligible. This will help to leverage resources and ensure that individuals are serviced effectively and able to achieve and maintain positive outcomes. The protocol for ensuring that this process is not cumbersome or overly complex has been adopted by the One-Stop system.

**Access to Recognized Postsecondary Credentials:** Work with DWD, the Wisconsin Technical College System and other state and local partners to implement recognized post-secondary credentials across programs that are desired and endorsed by employers and align to career pathways. Strategies include:

- 1) Use Eligible Training Provider List (ETPL) of vetted providers. This includes reviewing the ETPL training provider placement history and comparing vendor programs and outcomes to determine future ETPL eligibility. Employ Milwaukee staff will partner with DWD staff to recommend de-certification of vendors where appropriate.
- 2) Select training providers that meet the requirements set forth in the WIOA State Plan, which includes skill attainment, certification or degrees. Furthermore, Employ Milwaukee staff will advise the OSO provider and Title I service providers of ETPL vendor performance to ensure that Title I program training funds are utilized efficiently and that clients can expect job placement at the completion of ETPL training programs.
- 3) Job Service staff and Title I case managers and counselors provide Career Planning services to incorporate post-secondary education and technical skill set training when appropriate for the career pathway. This includes sharing the educational attainment earnings impact and labor market data when counseling clients.

### **3. Describe how the WDB will ensure that individuals are informed of non-traditional employment and training opportunities.**

A non-traditional career is defined as one where more than 75 percent of the workforce is of one gender. WIOA case managers are prepared to provide labor market information to individuals that will help them assess the prospects of a given occupation and whether that occupation is a good match for their interests and skills. This will counteract the tendency to channel unskilled women into occupations that emphasize traditional caretaking skills (such as childcare, home health aide, or food service) without adequate compensation, which

perpetuates earnings disparity between men and women. All females who are screened for WIOA registration receive NTO information.

Employ Milwaukee's services focus on developing career pathways, and training for high-wage jobs is prioritized. Employ Milwaukee believes that providing information about non-traditional occupations (NTO) is an important component of access to Labor Market Information. In addition, Employ Milwaukee is engaged in several US DOL discretionary grant initiatives through Tech Hire and the American Apprenticeship Initiative to promote non-traditional pathways to occupations.

**4. Describe the WDB's use of initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies, designed to meet the needs of employers in the local area to meet the needs of businesses. [Section 108(b)(4)(B)]**

Employ Milwaukee works upfront with employers to determine local and regional hiring needs and responds with relevant, contextualized, education and training programs. These include work-based learning opportunities with employers such as on-the-job training programs (OJT), customized training, internships, pre-apprenticeship, registered apprenticeships, and career pathways with bridges and stackable credentials. Employ Milwaukee will continue to focus on industry partnerships and career pathway strategies, as previously described.

Employ Milwaukee is a member of the Mayor's Manufacturing Partnership, a framework to encourage greater interaction among employers and workforce development providers. Employ Milwaukee is subsequently experiencing an uptick in technical training and OJT training requests from manufacturers and expects its employer collaboration model to grow across other sectors as it enhances and expands its IABs.

**5. Describe mechanisms that are currently in place or will be in place to provide microenterprise and entrepreneurial training, support programs and co-enrollment, where appropriate, in core programs. [134(a)(3)(A)(i)]**

Employ Milwaukee has established relationships with entities that provide guidance, support, and resources to encourage microenterprises and entrepreneurial opportunities, including the Small Business Administration (SBA), Wisconsin's Women's Business Initiative Corp. (WWIBC) and the University of Wisconsin-Milwaukee's School of Continuing Education. If a WIOA participant is a good candidate for their own business start-up, they are connected with the appropriate partner.

**6. Describe how the WDB enhances the use of apprenticeships to support the local economy and individuals' career advancement. Describe how job seekers are made aware of apprenticeship opportunities in the area's job centers.**

In 2015, Employ Milwaukee was a recipient of a five year American Apprenticeship grant from the U.S. Department of Labor Employment and Training Agency (DOLETA). The grant will help Employ Milwaukee grow its apprenticeship training strategies in the IT, construction, financial

services, healthcare, and manufacturing industry sectors. Expanding use of apprenticeships will enable Employ Milwaukee to drive new innovations, provide a specialized employment-ready workforce, and help fill critical talent gaps in the regional workforce. Employ Milwaukee will disseminate these apprenticeship opportunities through Job Centers and IABs, as well as partnerships with the DWD-DET-Bureau of Apprenticeship Standards and other community partners. Employ Milwaukee keeps outreach materials with updated sponsor lists in the One-Stop Centers, and instructs staff and system partners to incorporate information on the preparation for registered apprenticeships into career planning documents.

Employ Milwaukee's Career Plus Youth Apprenticeship (YA) Consortium began serving Milwaukee County in the 2016-2017 school year. Elements of this program are as follows:

- YA Consortium includes a steering committee including employers, nonprofits, school districts, colleges, and workforce representatives.
- High school students take related instruction in school while being matched with an appropriate employer for a youth apprenticeship.
- Employ Milwaukee helps recruit both students and employers, and trains employer mentors.
- Career Coordinators employed by Employ Milwaukee in the schools as part of the Career Plus program assist with youth apprenticeship.
- Students gain on-the-job training and experience while building sustainable career pathways.

Milwaukee County currently has five additional YA consortia operating within WDA 2 (i.e. South Shore, CESA 1, Milwaukee Public Schools, GPS Education Partners and Waukesha County School to Work). Employ Milwaukee's business service staff continually promotes the YA programs with WDA 2 employers and will refer employers to other YA consortia leaders who offer programs of interest to employers or express an interest in hiring a YA student from other YA consortia operating in Milwaukee County.

**7. Describe how the WDB will identify and work with key industry partnerships where they exist within the local area, and coordinate and invest in partnership infrastructure where they are not yet developed.**

Employ Milwaukee's five IABs play an instrumental role in supporting its sector-driven, employer-led approach. These IABs are responsive to industry and jobseeker needs over the long-term and businesses within an industry work in collaboration to solve problems and identify system improvements. The IABs also work to identify and obtain resources for sustainability and expansion of the sector-strategy model. Employ Milwaukee understands that its success is predicated on advancing workforce system alignment and developing and leading highly collaborative relationships with stakeholders. As such, Employ Milwaukee, as an intermediary, will actively participate in foster existing industry partnerships and participate in the facilitation of new partnerships.

Employ Milwaukee also engages and partners with Business Improvement Districts (BIDs), business associations, chambers of commerce and local business park occupants to identify employment needs and coordinate recruitment and hiring events. An example is the Franklin Business Park engagement, a collaboration of manufacturers who have identified common



skill needs for open positions, which led to a customized hiring event and opportunities for OJT and other talent acquisition programs/services.

- 8. Identify how the WDB plans to better align its resources to support and meet the training and employment needs of key industry sectors in the local area. Describe policies adopted or planned for aligning training initiatives and Individual Training Accounts (ITA) to sector strategies and demand occupations.**

Recommendations and feedback from IABs and other employers are shared with the Employ Milwaukee staff and coordinated with WIOA Job Development staff, Job Service Business Unit staff, and other area job development entities. This effort incorporates high priority employer needs into customized screening and placement services. Priority will be given to providers who offer recognized post-secondary credential outcomes that are aligned with in-demand industries or occupations in the local area.

## **VI. Program Services**

### **A. Priority of Service**

- 1. DET will provide a process for establishing priority of service for the Adult program for public assistance recipients, other low-income individuals, and those who are basic skills deficient. Describe any additional priority groups for the adult program other than those required by the Act.**

At this time there are no additional priority groups, but Employ Milwaukee reserves the right to revisit other priority groups based on trends among program participants.

Employ Milwaukee's Adult Program Priority of Services Policy can be found in Attachment M.

- 2. For participants who receive priority of service, WIOA Section 680.600 requires local areas to establish criteria by which the one-stop operator will apply such priority. Criteria may include the availability of other funds for providing employment and training-related services in the local area, the needs of the specific groups within the local area, and other appropriate factors. Provide the WDB's local criteria and/or policy. [134(c)(3)(E)]**

Employ Milwaukee's Veterans Priority of Services Policy can be found in Attachment N.

- 3. Provide a copy of the WDB's local policy that addresses how priority of service to veterans and eligible spouses will be applied. In addition, describe the local procedures developed to implement the requirements under the Jobs for Veterans Act (P.L.107-288)(38 USC 4215).**

Employ Milwaukee's Veterans Priority of Services Policy can be found in Attachment N.

## **B. Funding**

- 1. Describe any plans for transferring up to 100% of the funds between the adult and dislocated worker programs. If planned, include the circumstances applicable to a transfer request, the measures to assure no loss of service to the original program population, and the expected impact on program performance.**

Employ Milwaukee does not have a plan for transferring funds between the Adult and Dislocated Worker programs. Employ Milwaukee maintains a position of flexibility and, if transfer of funds is programmatically and fiscally appropriate, it will ensure that there is no loss of service to the original program population. Employ Milwaukee will also clearly stipulate the circumstances under which such a transfer would be appropriate and clearly identify the expected impact on program performance.

- 2. If applicable, describe the WDB's plans to utilize up to 10% of local dislocated worker, adult, and youth formula funds toward the pay-for-performance contract strategy.**

At this time, Employ Milwaukee does not currently utilize local adult, dislocated, or youth program funds for pay-for-performance contracts. However, Employ Milwaukee is open to discussing pay for performance and other incentive based options in the future.

- 3. Describe the WDB's plan for the allocation of funds between service categories for both adults and dislocated workers. Show the percentages for career services and training allocations for the Adult and Dislocated Worker programs.**

Employ Milwaukee plans to allocate funding across service categories in accordance with guidance from DWD. Historical precedence provides evidence to support how funding in specific service categories has influenced program performance. This experiential data will drive initial allocations, as allowable. Employ Milwaukee will maintain a position of flexibility in order to achieve successful programmatic outcomes.

## **C. Service Strategies**

- 1. Describe service strategies the WDB has in place or will develop that will improve meeting the needs of customers with disabilities as well as other population groups protected under Section 188 of WIOA and 29 CFR Part §38.**

Employ Milwaukee has continued using the Disability Resource Coordinator (DRC) model as implemented during the Disability Employment Initiative (DEI). The DRC improves access to One-Stop Center services through assistive technology and trains new One-Stop Center staff on serving customers with disabilities. The DRC conducts regular site visits to evaluate American Disability Act (ADA) accessibility for each Comprehensive Job Center. Other service strategies include:

- 1) Strengthen linkages between the One-Stop system and a variety of services to individuals with disabilities, including cross referrals with Benefits Planners.
- 2) Provide education regarding workplace needs of jobseekers with disabilities to key stakeholders, including employers, One-Stop staff and service providers in public/private agencies.
- 3) Ensure seamless service provision from One-Stop staff and such vital partners as DVR, Badgercare, General Assistance Medical Program (GAMP), Social Security, Housing Authority of the City of Milwaukee, transportation providers, and all other public entities that can assist with an array of supportive services.
- 4) Educate the network of providers serving individuals with disabilities about the One-Stop system and the incentives and programs in place for jobseekers with disabilities.
- 5) Job readiness classes that focus on how to communicate skills and address their disability to the employer.

**2. Describe the methods and procedures that have been developed (or are planned) to ensure coordination and collaboration with the following programs:**

- a) **TANF**
- b) **Food Share Employment and Training**
- c) **Adult Basic Education and English Language Learning Programs Authorized by**
- d) **Title II of WIOA**
- e) **Registered Apprenticeship**
- f) **Jobs for Veterans State Grants Program [38 U.S.C. §4102A(c)]**
- g) **National Farmworker Jobs Grant Program**
- h) **Senior Community Service Employment Program (SCSEP)**

Employ Milwaukee provides oversight of the One-Stop Centers in Milwaukee County. Employ Milwaukee recognizes the need for participants to gain seamless access to these services, and has extensive experience in coordinating and collaborating with all of the above-listed programs. Following is a brief description of the methods and procedures for each program and how these tie together for participants needing multi-tiered program service delivery.

**TANF:** Employ Milwaukee is co-located with TANF/Wisconsin Works (W2) and providers and their coordination ensures public assistance recipients are enrolled in programs and are receiving services they need. To achieve greater alignment and coordination, Employ Milwaukee, together with their TANF partners and sub-contractors, will continue refining co-enrollment functions.

**FoodShare Employment and Training:** ResCare is the current provider of FoodShare Employment Training (FSET) in the Milwaukee Area. Employ Milwaukee has a contractual agreement with ResCare and is coordinating efforts to co-enroll FoodShare recipients to receive support services, career guidance, and job-readiness services. Data regarding those co-enrolled informs service delivery and program planning.

**Adult Basic Education and English Language Learning Programs Authorized by Title II of WIOA:** The Milwaukee Area Technical College (MATC) provides Adult Basic Education and English Language Learning (ELL) programs in WDA 2. These services are open to the public and to eligible WIOA program participants. Employ Milwaukee also maintains a service provider list inclusive of programs authorized by Title II of WIOA at WDA 2 Job Centers. These services are inter-connected through the One-Stop Center and through program service providers. Employ Milwaukee plans to utilize these relationships to further link adult learners through bridge programs into career pathways that offer jobs or post-educational credentials.

**Registered Apprenticeship:** Employ Milwaukee is spearheading the development and expansion of new Registered Apprenticeships (RA) with a two-pronged goal:

- 1) Increase the number of underrepresented workers in Registered Apprenticeships, and
- 2) Educate the workforce development system and the business community about the value and practice of the Registered Apprenticeship system.

To do this, Employ Milwaukee has partnered with the DWD-DET's Bureau of Apprenticeship (BAS), the Federal Department of Labor's Apprenticeship USA, and the Compete Midwest Urban Strategies team, a regional partnership that includes the St. Louis Agency on Training and Employment, and Detroit Employment Solutions Corp.

Employ Milwaukee will work with local employers to develop RA programs aligned to post-secondary credentials and coordinate closely with the BAS to develop and certify these RA programs. In addition, it will work to establish credit-earning opportunities for apprentices to obtain college credit for eligible RA course work. The IABs will be instrumental in the education of employers about the benefits of RAs in each of the identified sectors.

Employ Milwaukee will work with its partners to design and support apprenticeship readiness programs designed to introduce job seekers to RA career pathways and assist them in securing the required credentials to become an eligible apprenticeship applicant.

Employ Milwaukee will continue to educate staff at the Job Centers and service delivery partners and ensure they are knowledgeable and prepared to promote RA's as highly beneficial career pathway options. WDA 2 Job Center staff will educate job seekers about the benefits of apprenticeship and will promote apprenticeship opportunities throughout the area. Underrepresented populations (including women, minorities, veterans, and people with disabilities) will be a primary focus for outreach and education. Individuals interested in pursuing an apprenticeship will be referred to appropriate employer sponsors for consideration.

Employ Milwaukee will coordinate with Job Center staff and Wisconsin BAS to develop and disseminate marketing materials that promote RAs and encourage non-traditional workers to choose apprenticeship as their career pathway.

As mentioned previously, Employ Milwaukee's Career Plus Youth Apprenticeship (YA) Consortium began serving Milwaukee County in the 2016-2017 school year. Elements of this program are as follows:

- YA Consortium includes a steering committee including employers, nonprofits, school districts, colleges, and workforce representatives.
- High school students take related instruction in school while being matched with an appropriate employer for a youth apprenticeship.
- Employ Milwaukee helps recruit both students and employers, and trains employer mentors.
- Career Coordinators employed by Employ Milwaukee in the schools as part of the Career Plus program assist with youth apprenticeship.
- Students gain on-the-job training and experience while building sustainable career pathways.

***Jobs for Veterans State Grants Program:*** The Office of Veterans Service (OVS) is a partner in the WDA 2 Job Centers and provides services to eligible veterans. Disabled Veterans' Outreach Program (DVOP) specialists provide intensive services to meet the employment needs of veterans with significant barriers to employment. Local Veterans' Employment Representatives (LVER) staff coordinate with Employ Milwaukee to promote to employers, employer associations, and business groups the advantages of hiring veterans.

***National Farmworker Grant Program:*** United Migrant Opportunity Services (UMOS) is charged with the administration of the National Farmworker Grant Program for DWD in WDA 2 and across the state. UMOS is also an integral partner with Employ Milwaukee and ensures access to this program is provided via informed staff at all American Job Centers in WDA 2.

***Senior Community Service Employment Program:*** Employ Milwaukee recognizes the Senior Community Services Employment Program (SCSEP) as a valuable job center partner. The SCSEP, which is known as the Wisconsin Senior Employment Program (WISE), provides part-time on-the-job subsidized training in community service assignments for unemployed, low-income older persons who are 55 years of age and older, whose prospects for employment are poor and who have the greatest economic and social need.

Employ Milwaukee will work with SCSEP to provide cross-program coordination and alignment to promote a better understanding of each partner's role in assisting older workers. In addition, aligning co-enrollment with SCSEP program will provide the opportunity for dually-eligible seniors to obtain meaningful employment.

- 3. Describe how the local workforce development board will work with local and statewide offender reentry initiatives supported by the Department of Corrections, as required by 2015 Wisconsin Act 55, 106.36(2)(b). The description should include the following: how labor market information and assessment tools will be utilized, how the board will collaborate with local work release facilities, plans for coordination of case management services, and coordination with programs authorized under WIOA Section 225(a).**

As mentioned previously, WDA 2 is home to many individuals who are incarcerated or have been involved in the criminal justice system. Wisconsin Department of Corrections

(DOC) records show incarceration rates at extremely high levels for African American males in Milwaukee County. Over half of African American men in their 30s and half of men in their early 40s have been incarcerated in state correctional facilities.<sup>14</sup>

As a workforce leader in the community, Employ Milwaukee has placed a strong emphasis on the coordination and expansion of reentry services among the many agencies that may touch upon the lives of ex-offenders. In particular, coordination involves working with those who have the capacity to address the employment, training, and education barriers faced by the ex-offender population.

Employ Milwaukee's reentry strategy provides training and employment opportunities with the goal of reducing criminal thinking and increasing healthy family relationships for adults returning from county/state/federal correctional facilities, youth returning from juvenile justice facilities, and adults and youth on county, state or federal supervision living in Milwaukee County.

Employ Milwaukee uses an evidence-based reentry model to implement a work readiness assessment process for inmates that factors in criminogenic needs and responsivity principles that are directly related to recidivism, with an end goal of breaking the cycle of incarceration and developing long-term economic success for individuals. Milwaukee is one of only two cities nationwide chosen by the Council of State Governments to receive technical assistance on this reentry model. The Integrated Reentry and Employment Strategies (IRES) Pilot Project is a collaborative partnership between Employ Milwaukee, WI DOC, WI DWD, and the Council of State Governments.

Employ Milwaukee actively seeks competitive federal, state, local, foundation funding to support its reentry strategy and supplement WIOA funding. In 2015, Employ Milwaukee received a \$500,000, three year grant award from the U.S. Department of Labor Employment and Training Agency (DOLETA) to establish an American Job Center within the Milwaukee County House of Correction. This innovative program will provide pre- and post-release services to inmates to ensure they have access to and benefit from the public workforce system, gain employment, and reduce their risk of recidivism.

Employ Milwaukee will coordinate referrals for potential WIOA program participants from multiple access points, and will involve job centers, co-locations via the Department of Corrections, and other community-based points of reentry. Coordination will also include screening and certified and/or vocational trainings.

**4. Describe how the WDB will ensure collaboration with Adult Basic Education and English Language Learning programs so that adults who need to improve their reading, writing, math and/or language skills have access to integrated instruction and accelerated entry into post-secondary education to earn an industry-recognized credential.**

Employee Milwaukee has an established history of working in close collaboration with Adult Basic Education (ABE) and English Language Learning (ELL) programs for individuals

<sup>14</sup> Source: Pawasarat, John and Quinn, Lois M. *Wisconsin's Mass Incarceration of African American Males: Workforce Challenges of 2013*. Employment and Training Institute. University of Wisconsin-Milwaukee 2013.

in need of services. This network of collaboration extends beyond the technical college system and includes recognized purveyors of educational services with expertise in working with adults. **Table 11** illustrates an example of providers and educational services currently serving program participants. Please note that the table is not all-inclusive as Employ Milwaukee is continually adapting its capacity to serve individuals by expanding its network of educational providers.

<b>Table 11: WDA 2 Providers and Educational Services</b>	
<b>Provider</b>	<b>Educational Service</b>
Milwaukee Area Technical College	Adult Basic Education General Equivalency Degree (GED)/High School Equivalency Degree (HSED) Programs English Language Learning (ELL) Post-Secondary Education Training Programs w/ Industry-Recognized Credentials
Milwaukee Achiever Literacy Services	Adult Basic Education GED/HSED Programs including 5.09 GED Program ESL Training Programs w/ Industry-Recognized Credentials
Social Development Commission	Adult Basic Education 5.09 GED Program
Council for the Spanish Speaking	ELL
Neighborhood House, International Learning Center	ELL programs (expertise in refugee populations)
United Migrant Opportunity Services	ELL
Catholic Charities	ELL
Literacy Services of Wisconsin	Adult Basic Education

Employ Milwaukee continually evaluates the educational needs of program participants and maintains flexibility to identify and acquire timely educational services. Employ Milwaukee enlists the support of community partners to make certain that needs are addressed. Additionally, Employ Milwaukee engages business partners through its IABs to validate that the educational services provided meet the needs of business and industry. This consultative approach ensures that industry-recognized credentials offered and earned add value in targeted high demand industries and occupations.

- 5. Provide a description of plans, strategies and assurances to maximize coordination of services provided under the Wagner-Peyser Act and WIOA (for example, WIOA Title 1 staff document workshop services provided by WIOA Title 1 staff in ASSET). The description should include how improved service delivery and avoidance of duplication of services will be achieved. [§108(b)(12)]**

Employ Milwaukee contracts with service providers who coordinate with and enhance labor exchange services provided under the Wagner-Peyser Act at the area’s Job

Centers. Under this design, service provider staff work side-by-side with Wagner-Peyser staff, particularly in the One-Stop resource rooms. WIOA Title I-funded staff do not duplicate any Wagner-Peyser staff efforts. Employ Milwaukee contracts with service providers to provide core, registration, enrollment, case management, job development, job placement, and retention services for program participants. At each One-Stop, WIOA service provider will be responsible for provision of all WIOA Title I Program services. This clear delineation of roles and responsibilities within a single location provides for the elimination of duplication of service and promotes easier access.

**6. Describe the process used for reviewing and updating Individual Employment Plans (IEP). Include if the process is used for every participant or if there are exceptions, how frequently it is done, and how it is documented in the participant file and ASSET.**

The Individual Employment Plan (IEP) is a WIOA participant's plan that includes short- and long-term employment goals, achievement of job training and placement objectives, documentation of the need for training, and the combination of services that will lead to successful unsubsidized employment and job retention. The IEP is developed by the participant in tandem with the WIOA case manager/provider, and the participant becomes an active contributor in creating and achieving his or her goals.

As an ongoing strategy, the IEP is routinely reviewed. The expectation of Employ Milwaukee is that IEP review occurs every six months at a minimum. However, it is required that the IEP be referenced continually as services are provided to ensure that actions taken are in keeping with the goals and objectives set forth in the IEP. The IEP is part of the participant's paper file, and IEP activities, such as career management and supportive services, are recorded in ETO and ASSET. Contract monitoring staff evaluates case notes and the IEP details to make sure that they are in alignment. This continued evaluation ensures progress toward the achievement of the participant's employment goals, training objectives, and any supportive services needed within the program period.

**7. Attach the WDB's policy on Needs Related Payments, or, indicate that the WDB does not use this WIOA provision.**

Employ Milwaukee does not use the WIOA Needs Related Payments Policy provision.

**8. Attach the WDB's supportive services policy.**

Employ Milwaukee's Supportive Services Policy can be found in Attachment R.

**9. Describe the process for contacting active participants (adults/dislocated workers and youth). Include if the process is required for every participant or if there are exceptions, how frequently contact attempt is required, how it is documented, and what the procedures are for successful contact attempts.**

Employ Milwaukee maintains an expectation of monthly contact with participants as a general rule. There may be exceptions depending on the activities in which a participant



is active. An example of such an exception would include a participant that is in need of more routine monitoring due to training attendance requirements. Participants receiving transportation assistance as a supportive service in the form of bus tickets may have weekly contact upon receipt of transportation assistance.

Contact attempts are documented in ASSET and in case notes. Case notes are expected to document the means of contact, results of contact, and purpose of contact. Contract monitoring staff evaluates case notes for completeness and accuracy.

**10. Describe the criteria used by the WDB to determine the appropriateness of exiting a participant (adults/dislocated workers and youth). For example, no contact with case manager, employment plan goals have been met, participant becomes employed at the locally-defined self-sufficiency wage or certain percentage of federal poverty limit, has been employed for minimum number of days, etc.**

At this time, Employ Milwaukee has not established a policy for exiting participants from the program; it is currently up to the discretion of the case managers, who are trained in understanding WIOA policy and procedures. A policy may be created in the future to address exiting participants.

Employ Milwaukee uses the following process when determining when to exit a program participant:

***Point of Exit for Common Measures Reporting:*** The term ‘program exit’ means a participant has not received a service funded by the program or funded by a partner program for 90 consecutive calendar days and is not scheduled for future services. The exit date is the last date of service.

All individuals registered in WIOA will have an IEP developed in conjunction with program staff. Ideally, program exit occurs when the individual has completed the plan of service as included in their IEP and enters appropriate unsubsidized employment. Employ Milwaukee participants are to exit the WIOA program when:

- 1) They are employed at a level that meets the local definition of self-sufficiency; or
- 2) They have not received any WIOA-funded or WIOA-partner funded services for a period of 90 days and no services are scheduled; or
- 3) They are exited under one of the exclusions: institutionalized/incarcerated, family and family care, health/medical conditions, deceased, reserve forces called to active duty, relocated to a mandated program (youth only), or invalid or missing social security number.

By following these standard principles, uniformity is established and maintained.

**11. Provide a copy of the WDB's follow-up services policy. This policy should include follow-up requirements (follow-up on all participants or exceptions), frequency of contact, and required documentation.**

Employ Milwaukee’s Follow-Up Services Policy is in Attachment S.

## D. Dislocated Workers

### 1. Provide the WDB's definition of "unlikely to return to previous industry or occupation" when required for eligibility for dislocated worker services.

The following factors are used to determine whether an individual meets the threshold of "unlikely to return to previous industry or occupation" for purposes of determining eligibility for WIOA Dislocated Worker services.

Documentation of any one of these factors will be sufficient to establish that an applicant meets the "unlikely to return" threshold, including:

- 1) Long term employment in the industry is stagnant or contracting in the Milwaukee area as measured by State labor market economists.
- 2) Industry is undergoing substantial technological advancement resulting in layoffs due to skills obsolescence.
- 3) Growth of the occupation in Wisconsin is average or below average, or below 5%, as established by O\*NET projected growth statistics.
- 4) The median wage for the occupation in Wisconsin yields annualized income of less than 200% of poverty level for family of four.
- 5) Applicant has a documentable disability, medical condition, or legal issues that render him or her unlikely to fulfill the minimum requirements of the occupation.
- 6) Applicant has obsolete or insufficient skill set for reentry into the occupation, to be evaluated on basis of O\*NET occupational descriptors.
- 7) Applicant has sufficient skill sets for employment in the occupation, but does not have the credential(s) currently required by most employers.
- 8) Applicants have engaged in six months or more of unsuccessful search for employment in their previous occupation or industry, verified by duration of fulfilling UI job search requirements.
- 9) Applicant has adequate occupational skills but needs basic skills remediation to meet thresholds for reentry into the occupation or industry, as measured by standard basic education instruments.
- 10) Applicant is an English Language Learner with a language barrier to employment in the occupation or industry.

### 2. Describe WDB policies and procedures to support Re-employment Services (RES) activities. For example, participation in RES in-person sessions.

Maximus and America Works of Wisconsin provide Adult and Dislocated Worker Program services under subcontract with Employ Milwaukee. Working in close collaboration with the Wisconsin Department of Workforce Development Unemployment Division, Employ Milwaukee's service providers provide in-person outreach at RES sessions. These informational presentations provide Unemployment Insurance-registered job seekers with program materials and the opportunity to explore the services offered through the Dislocated Worker program.

- 3. Describe the process for providing rapid response services to worker groups on whose behalf a Trade Adjustment Act (TAA) petition has been filed. [§134(a)(2)(A)] This description must include how the local area disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them.**

In accordance with the DWD's Rapid Response Redesign effective July 1, 2015, Rapid Response services and service delivery methodology are detailed in Employ Milwaukee's Rapid Response Policy and Procedures (Attachment V). The plan incorporates providing Rapid Response services to worker groups on whose behalf a trade petition has been filed.

Certification of trade petitions are not immediate and often times workers are dislocated before a determination has been made. In cases such as these, workers can still access dislocated worker services through WIOA local funding or Rapid Response Grants, if applicable.

- 4. Describe the local area's Rapid Response framework and processes, addressing the following items:**
  - a. Identification of WDB and Job Service leads (Rapid Response Practitioners)**
  - b. Clarification of roles and responsibilities for the WDB and Job Service**
  - c. Mechanisms for routine communication between the WDB and Job Service**
  - d. Integration of the minimum level of required transition services (see list on the Rapid Response Practitioners' webpage, <https://workweb.dwd.state.wi.us/det/bwt/dw/default.htm>)**
  - e. Identification of flexible and innovative services and solutions to address both employers' and workers' transition needs**
  - f. Mechanisms for leveraging staff and other resources**
  - g. Effective utilization of materials**
  - h. Engagement of appropriate partners**

Employ Milwaukee has created standard operating procedures for the Rapid Response framework in the local area, included in Attachment V.

- 5. Describe the mechanisms that are currently in place or will be in place to identify employers at risk of layoffs. [§682.330(g)(1)]**

Employ Milwaukee and its Dislocated Worker Program providers work closely with DWD staff in assessing labor market trends and specific employment sectors to identify employers at risk of layoff. Insight provided by workforce development and industry partners within the larger workforce system assist in this endeavor.

- 6. Describe the methods and procedures the WDB developed or will develop to expand coordination of service delivery with the Trade Adjustment Assistance program. The Department of Labor expects the State (via the WIOA program) to offer Rapid Response**

and wrap-around services to TAA-eligible dislocated workers, prior to and post training services.

The description should include all phases of the dislocation response process, such as rapid response on receipt of petition notice, participation in program orientation, assessment and Employment Plan development, preparation for reemployment and skill training, and provision of placement services.

Employ Milwaukee has developed a well-established coordinated service delivery system with the Trade Adjustment Assistance (TAA) Program. WDA 2 TAA case managers work side-by-side with WIOA Dislocated Worker program staff. TAA supervisory staff split time between the Employ Milwaukee office and One-Stop Centers to ensure full access across programs and services.

The DWD-TAA WDA 2 Director is a designated member of the Rapid Response Team for the WDA, thus assuring cross-program coordination. This level of communication and coordination provides impacted workers with the benefits of wrap-around services that are directly related to the training, supportive service placement, and follow-up needs.

The steps outlined in **Table 12** describe the actions taken in the dislocation response process beyond Rapid Response activities and upon receipt of trade petition notice.

<b>Table 12: WDA Dislocation Response Process</b>	
<b>Step 1</b>	Individual makes application for services at a Job Center through the Dislocated Worker Case Management staff. Dislocated Worker and Employ Milwaukee staff will also check for trade eligibility.
<b>Step 2</b>	Schedule Orientation.
<b>Step 3</b>	During the orientation/intake, participants are evaluated through assessment testing and get an overview of services provided through the Dislocated Worker Program and an orientation to the TAA program.
<b>Step 4</b>	Participants are assigned a Dislocated Worker Case manager who provides the initial one-on-one interview in which the IEP is developed.
<b>Step 5</b>	The participant is referred to the TAA Program with a follow-up scheduled appointment for the initial interview with the TAA case manager.
<b>Step 6</b>	After the participant establishes a TAA case manager, the TAA and Dislocated Worker case managers work jointly to determine which re-employment and/or training services will be provided from perspective programs.
<b>Step 7</b>	Case management staff works with the Employ Milwaukee Business Services team and its network of industry partners for placement services.

**E. Title I Basic Career Services**

- 1. Describe any basic career services that will be provided in addition to those specified in Sec. 134(c)(2)(A)(i) of the Act and TEGL 3-15.**

At this time, Employ Milwaukee does not plan to provide any additional basic career services beyond those specified in Section 134(c)(2)(A)(i) of the Act and TEGL 3-15.

Qualified and interested job seekers are also referred to Employ Milwaukee's Construction Sector Services Provider (CSSP) who delivers construction readiness training and placement services for job seekers in Milwaukee County. Services include construction orientations, testing and assessment for job readiness, construction industry readiness training, placement, and retention services.

**2. Describe the WDB's design for Title I basic career services.**

Employ Milwaukee ensures that Title I basic career services are offered in the One-Stop system. All mandated partners within the system are coordinated in such a manner that allows for easy transition from basic to individualized career service. At this time, the following basic career services are provided to customers:

- 1) An orientation of the services offered;
- 2) Potential customers who express further interest are assessed for possible WIOA enrollment, provided information on job center programs, and informed about documentation that may be required to enroll in those programs;
- 3) For those who meet WIOA eligibility, a meeting is scheduled for basic skills testing, and further information is provided regarding labor exchange services, training, supportive and other career services.

These services are provided throughout a participant's active participation in the program.

**3. Under WIOA, there is no requirement that a participant must receive career services prior to training services. However, at a minimum, to be eligible for training, an individual must receive an eligibility determination for training services. Describe how the WDB will manage this for participants being fast-tracked into training. [§680.220].**

In full accordance with WIOA, determination of eligibility for and access to training services is made by agencies sub-contracted to provide such services in the Adult and Dislocated Worker Programs. Information gathered from assessments is required in order to find training services appropriate. Additionally, in full compliance with WIOA and as instructed in TEG 03-15 and the DWD-DET WIOA Program Guidance for Adult, Dislocated Worker, and Youth Programs, the participant must meet following conditions for training services and these must be supported and documented in the participant's paper file and ASSET:

- 1) Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone;
- 2) Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services alone; and

- 3) Has the skills and qualifications to successfully participate in the selected program of training services.

#### **F. Individualized Career Services**

- 1. Describe any individualized career services that will be provided in addition to those identified in Section 134(c)(A) (xii) of the Act and TEGL 3-15.**

There is currently no plan to offer additional individualized career services beyond those identified in Section 134(c)(A)(xii) of the Act and TEGL 03-15. Nonetheless, Employ Milwaukee maintains flexibility through its sub-contractors to allow for additional individualized career services in advance of or as a result of workforce needs within the WDA.

- 2. Describe how individualized career services will be coordinated across programs/partners in the One-Stop Centers, including Vocational Rehabilitation, TANF and Adult Education and Literacy activities. Specify how the local area will coordinate with these programs to prevent duplication and improve services to customers.**

Individualized career services are provided through Employ Milwaukee's subcontracted agencies. These partners are an integral part of the One-Stop system, and Employ Milwaukee works with all partners in a coordinated strategy to increase its capacity and improve its effectiveness in partnering with employers, government and public-sector entities, non-profit and community-based organizations, education systems, and labor organizations. Employ Milwaukee's OSO plays a vital role in ensuring this coordination in the area's Job Centers to facilitate maximum benefits to customers. Employ Milwaukee is exploring how to expand its intake system to coordinate data sharing, promote co-enrollment, and reduce the instances of duplicated service.

- 3. DET is currently developing a statewide definition for economic self-sufficiency, including the process for applying the definition. Until that is implemented, WDBs are to use their current definition and processes. WDBs are required to adopt the State's definition and processes once it is issued. The following language should be added to the WDB's local plan: "The WDB will continue applying its previously approved self-sufficiency definition until the State's uniform 'economic self- sufficiency' definition, policy, and process for application have been issued. Once issued, the WDB will cease using its local definition and adopt the uniform definition, policy and process for application." Attach the WDB's previously approved self-sufficiency definition/policy.**

Employ Milwaukee's Self-Sufficiency Policy can be found in Attachment Q.

- 4. The State's economic self-sufficiency policy allows local areas to place individuals into training programs that may not immediately lead to economic self-sufficient employment. Describe the general instances or circumstances where this would be allowable and the procedure that will be used to allow these exceptions. Otherwise, confirm that this is not an allowable process within the local area.**

Employ Milwaukee serves the needs of a very diverse population. This diversity is exemplified through a wide variance in skill and educational levels, limited English proficiency, criminal backgrounds, transportation issues, and other substantial barriers to employment. In cases such as these, as well as cases involving other special populations, individuals may be placed into training programs that may not immediately lead to economic self-sufficiency employment. It remains the goal of Employ Milwaukee that these training options are in line with career pathways that lead to economic self-sufficiency.

The process for evaluating and approving such training placement is structured includes the following protocols:

- 1) Review of the training program.
- 2) Evaluation of the program's connection to a career pathway.
- 3) Assessment of the individual's needs, skills, and ability to successfully complete the program.
- 4) Analysis of the local labor market to confirm the availability of current employment opportunities and future employment outlook in the related sector.

Employ Milwaukee's Self-Sufficiency Policy is located in Attachment Q. This policy does not allow individuals to be placed into training programs that may not immediately lead to economic self-sufficient employment.

## **G. Training Services**

- 1. Of the amount the WDB has allocated for training, identify the percentage of training funds earmarked for ITA, On-the-Job Training (OJT), incumbent worker training, transitional jobs and customized training.**

At this time Employ Milwaukee has not allocated separate funds for ITA, OJT, incumbent worker training, transitional jobs and customized training. The WDB will continuously evaluate the need for such allocations and make decisions accordingly.

- 2. Describe any plans for using up to 20% of local area dislocated worker and adult formula funds to provide the Federal share of the cost of providing training through a training program for incumbent workers. Submit the local policy and forms, including an itemization of the non-federal reimbursement share [§680.800, 134(d)(4)(A)(i) and TEGL 3-15]**

Employ Milwaukee's Incumbent Worker Training Policy can be found in Attachment Y.

- 3. Describe any plans for using up to 10% of local area dislocated worker and adult formula funds to provide transitional jobs, including the process to identify individuals with barriers to employment, chronically unemployed or have an inconsistent work history; identify appropriate employers, planned reimbursement amounts, what supportive services will be included, and any limits on duration. Submit the WDB's local policy and forms. [134(d)(5), §680.840a and TEGL 3-15]**

Employ Milwaukee will continuously evaluate the need to amend policies relative to future allocations for transitional jobs funded under WIOA accordingly.

- 4. Describe how the WDB will, with representatives of secondary and postsecondary education program, lead efforts in the local area to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services that are needed by adults and youth, particularly individuals with barriers to employment. Information about Wisconsin Career Pathways, formerly the RISE Initiative, can be found at [§101(d)(5)]**

Employ Milwaukee, in partnership with representatives from Milwaukee Public Schools and Milwaukee Area Technical College, plans to identify, create, and develop career pathway opportunities within the local area by integrating efforts into Employ Milwaukee's sector-based strategies. Information developed through Wisconsin Career Pathways regarding existing career pathways is used as a resource for program staff. Additional alignment with IABs will create innovative and unique career pathway opportunities that will be available across all programs while emphasis remains on the youth and individuals with barriers to employment.

- 5. Describe the WDB's policy for its Individual Training Account (ITA) system including limits on duration and amount. This description (and policy) must include the (1) specific process and/or method used by which WIOA training funds are coordinated with other sources of funding for training and, (2) process by which WIOA funds are utilized if other sources of funding are pending approval, and how those WIOA funds are accounted for when other sources of funding are approved/disapproved. Submit the WDB's ITA policy.**

Employ Milwaukee's Individual Training Account (ITA) policy can be found in Attachment O.

- 6. Describe and attach the WDB's policy and procedures for adding, monitoring and removing training providers from the ITA list.**

Employ Milwaukee's Individual Training Account Policy and Procedures can be found in Attachment O.

Employ Milwaukee's ITA procedure for adding, monitoring, and removing training providers from the ITA list is as follows:

***To add a training provider:*** The prospective provider submits an ITA Application to Employ Milwaukee, then Employ Milwaukee staff conduct a site visit of the prospective trainer's premises to assess suitability of training facilities, and interviews the provider. Employ Milwaukee reviews and approves the application and submits it to DWD for approval and inclusion in the Statewide List of Eligible Training Programs and Providers.

***To monitor training provider:*** Monitoring taking place at the time of application and when Employee Milwaukee receives complaints from program participants, or if it is



deemed necessary based upon information received. In addition, the Product Management Office's business analyst utilizes ETO reports to review ITA vendor performance (e.g. cost of training participants, programs with low placement results) and advises Employ Milwaukee leadership on vendors who could be considered for removal from the ETPL.

***To remove of a Training Provider:*** A training provider is removed if it is no longer exists or is closing, or if information is obtained that deems necessary for provider to be removed.

**7. Describe the WDB's intent to use exceptions (contracts) instead of or in conjunction with the ITA system. Address the following issues as applicable:**

- a. Describe the WDB's policies for OJT and Customized Training opportunities including the length and amount. Submit the WDB's OJT policy and customized training policy.**

Employ Milwaukee's OJT Policy can be found in Attachment P.

Employ Milwaukee's Customized Training Policy can be found in Attachment X.

- b. If a determination was made that there is an insufficient number of eligible providers, describe how this determination was made and the competitive process to be used in selecting providers under a contract for services.**

Not applicable. On the contrary, WDA 2 clients have hundreds of ITA options available. Employ Milwaukee staff directs Title I case managers to coach clients on high-demand occupations and industry sectors to ensure that clients are making informed training decisions that lead to job placements and sustainable employment.

- c. If the WDB intends to serve special participant populations that face multiple barriers to employment, describe the criteria to be used to determine the demonstrated effectiveness of community-based organizations or other private organizations that serve these populations.**

At this time, participants served meet WIOA eligibility requirements without additional local criteria. Employ Milwaukee continuously monitors the demographics of individuals being served through its many programs. If it is deemed necessary to serve a special population outside from those already eligible for WIOA Title 1 services, strategies will be implemented internally and externally to serve those populations. Criteria that will be used to determine effectiveness of Community-Based Organizations (CBOs) or other private organizations will be based on organization history, training cost effectiveness, program description, alignment of other resources, and relationships with local employers to address specific needs.

**8. Describe the documentation required to demonstrate a "need for training."**

The documentation required to demonstrate the “need for training” is an internal document checklist that is used to ensure that the training request is in a high growth, high demand area within the targeted sectors, assessment results, current employment plan, and the customer training statement.

## **H. Youth Program**

**WIOA outlines a broader youth vision that supports an integrated service delivery system and gives framework through which states and local areas can leverage other Federal, State, Local and philanthropic resources to support in-school and out-of-school youth.**

**1. Since WIOA requires 75% of youth funds to be spent on out-of-school individuals, please provide the following information:**

**a. WDB's approach to meeting the required 75% minimum youth expenditure, including the planned program design.**

Employ Milwaukee is currently contracting with Dynamic Workforce Solutions and United Neighborhood Centers of Milwaukee (UNCOM) to provide WIOA OSY services. This collaboration uses a uniform program design and metrics framework. The program design includes, but is not limited to, the following key components:

- 1) Case management
- 2) Career counseling and planning services
- 3) Work experiences (subsidized and unsubsidized)
- 4) Short and long term occupational skills training
- 5) Referrals to registered apprenticeship opportunities
- 6) Follow-up

**b. Current and planned recruitment strategies to expand and market services to out-of-school youth include:**

- 1) Promote programs and/or activities in media, such as newspapers or radio programs, that specifically target various populations
- 2) Send notices about openings in the recipients’ programs and/or activities to schools or community service groups that serve various populations
- 3) Consult with appropriate community service groups about ways in which the recipient may improve its outreach and service to various populations
- 4) Regularly communicate and build partnerships with community and faith based organizations and service providers

**c. Current and planned strategies to target services to youth, and to ensure seamless, year-round services to out-of-school youth.**

Employ Milwaukee ensures seamless year-round services to OSY by ensuring they are referred and/or enrolled in eligible services provided at the One-Stop Centers. Each of these connections, co-enrollments, or referrals will be based on each youth’s IEP and goals. Ongoing monitoring and technical assistance by Employ Milwaukee staff is an integral part of the Year-Round Youth Innovative Program

services. The goal is to ensure that programs are running smoothly, proper service levels are maintained, and all programmatic and fiscal requirements are being met by service providers.

Youth service providers are required to submit work plans with quarterly projections of activities and performance goals, which are monitored to ensure programs are on target to reach desired outcomes. Employ Milwaukee provides services outside the regular school day, except when it conflicts with a back-to-school strategy.

**d. Current and planned strategies to encourage 16-17 year old dropouts/non-attenders to return to school.**

In serving and maintaining contact with 16-17 year old youth, Employ Milwaukee has developed and promoted strategic partnerships at the local levels that facilitate coordinated service delivery strategies and the ability to leverage WIOA resources. These partners have access to youth in this age category. Examples of these workforce partnerships include: Milwaukee Public Schools, Milwaukee Area Technical College, Housing Authority of the City of Milwaukee, Wisconsin Department of Children and Families (DCF), and WI DOC. Employ Milwaukee enacts youth investment strategies in collaboration with industry sector employer partners, Job Corps, and Youth Apprenticeship.

**e. Current and planned retention strategies to retain out-of-school youth in employment or post-secondary education.**

Employ Milwaukee has developed new partnerships and programs to offer creative applications and evidence-based youth solutions. The OSY programs provide job placement, career assessment, soft and transferable skills, and career counseling services. In addition, disconnected youth are offered hands-on career exploration sessions at technical colleges, job fairs, and workshops. OSY pursuing post-secondary training are provided with career counseling that includes information on the local labor market, career pathways, salary ranges, and employment opportunities. An assessment is conducted to match the selected career path to the aptitude and skills of the individual.

**f. Current and planned service strategies for assuring that out-of-school youth deficient in basic reading/writing and math will increase one Educational Functioning Level.**

Ongoing monitoring and technical assistance by Employ Milwaukee staff is an integral part of the Out-of-School Youth Program services. The goal is to ensure that programs are running smoothly, proper service levels are maintained, and all programmatic and fiscal requirements are being met by service providers. Year round agencies are required to submit work plans with quarterly projections of activities and performance goals, which are closely monitored to make sure programs are on target to reach desired outcomes. The work plans will include information such as the provider's program design, the assessment tools and

techniques to be used in administering assessments, and how frequently assessments will be incorporated in the out-of-school youth's IEP. Employ Milwaukee requires provider work plans to include evidence-based techniques in measuring reading, writing, and math deficiencies.

**g. Strategies to ensure career pathways information will be included in the participant's Individual Service Strategy.**

During the enrollment interview, the case manager provides the opportunity for the participant to communicate their career interests and gives them the information about the qualifications needed, along with labor market trends, for that field. A participant's Individual Service Strategy (ISS) is jointly developed, stating the participant's primary goals and the progress towards their career pathway.

**2. Provide the name of the assessment tool(s) the local board will administer to in-school and out-of-school youth to assess their academic levels.**

Employ Milwaukee uses the Test of Adult Basic Education (TABE) test to assess participant academic needs. Selected providers are given the option to recommend other accredited assessment tools based on their subject matter expertise and experience, provided these are approved by Employ Milwaukee prior to implementation.

**3. Describe how the local board will assess the youth for occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs.**

As part of the enrollment process described in H(1)(g) above, case managers use the assessment tools that test aptitude, achievement, career development inventories and career interest, including TABE testing, CareerLocker, WorkKeys, and Prove it.

**4. Describe the activities the local board will provide that lead to the attainment of a secondary school diploma or its equivalent, or a recognized post-secondary credential.**

In addition to ongoing assessment using TABE for out-of-school youth, Employ Milwaukee's selected providers are required to include in their work plans their proposed performance goals for each performance measure, including attainment of high school diploma or a post-secondary credential. Strategies to meet these goals may include direct employer involvement in curriculum development, classroom teaching, assessing participant attainment of competencies, internships and work-based learning opportunities, commitment to interviewing successful program graduates, and hiring successful program graduates. Supportive services will be integrated into this strategy to include support for mental health needs, gang prevention education, financial literacy, healthy relationship education, anger management services, communication and essential skills services.

**5. Describe the activities the local board will provide to prepare the youth for post-secondary educational and training opportunities.**

In addition to the response indicated in the previous question, Employ Milwaukee will enhance secondary education and training opportunities through its continued youth partnerships and initiatives. Currently, WDA 2 is involved in several local efforts in regards to youth initiatives including Milwaukee Succeeds, the Milwaukee LIHF Course Collaborative, Beyond the Bell, and the Milwaukee Brighter Futures Consortium.

- 6. List the agencies and/or organizations the local board will partner with to provide services to youth that are:**
  - a. Subject to the juvenile or adult justice system;**
  - b. Homeless;**
  - c. Runaway;**
  - d. Pregnant or parenting;**
  - e. Individuals with a disability;**
  - f. Foster children;**
  - g. Aging out of foster care;**
  - h. English language learners;**
  - i. School dropouts; and**
  - j. Within the age of compulsory school attendance, but have not attended school for at least the most recent complete school year quarter.**

Employ Milwaukee partners with a vast array of community- and faith-based organizations in Milwaukee County, some that provide services to youth who are described in VI.H.6.(a-j) above. Please refer to **Table 13** for more information about Employ Milwaukee's youth partner organizations.

- 7. List the resources or services the agencies and/or organizations could provide these youth.**

Employ Milwaukee partners with a vast array of community- and faith-based organizations in Milwaukee County, some that provide services to youth who are described in VI.H.6.(a-j) above. Please refer to **Table 13** for more information about Employ Milwaukee's youth partner organizations.

**Table 13: WDA 2 Youth Community Partners**

<b>Barrier to Employment</b>	<b>Organization</b>	<b>Resources/Services for Youth</b>
Subject to the Juvenile Justice System	St Charles Legal Action Children’s Court Running Rebels Social Development Commission (SDC)	Legal assistance
Homeless	Walkers Point Pathfinders Milwaukee Rescue Mission Milwaukee Women’s Center Salvation Army My Home Your Home Community Advocates Hope House American Red Cross Teen Challenge International WI	Spiritual and material help for poor and homeless Shelter services
Runaway	Walkers Point Pathfinders Teen Challenge International WI	Shelter services Supportive services
Pregnant or Parenting	Planned Parenthood Parent Network Northcott Neighborhood House Children’s Outing Association	Parenting classes and resources
Individuals with a Disability	DWD-DVR Goodwill Industries Milwaukee Center for Independence Lutheran Social Services Independence First	Occupational training, community resources
Foster Children	Lad Lake: St. Rose Youth and Family Center Children’s Service Society of Wisconsin WI DCF – Division of Milwaukee Child Protective Services (DMCPS) SaintA	Supportive services, and independence-related skill building
Aging Out of Foster Care	Lad Lake Children’s Service Society of WI WI DCF – DMCPS	Independent living resources
English Language Learners	Please see Table 11.	
School Dropouts	Milwaukee Area Technical College Milwaukee Achiever	GED and HSED services
Within the age of compulsory school attendance, but have not attended school for at least the most recent complete school year quarter	Milwaukee Public Schools Trans Center for Youth	Reengagement services for youth with school attendance issues.

**8. Describe how the local board will ensure that parents, participants and other members of the community with experience relating to the programs for youth are involved in the design and implementation of these programs.**

Employ Milwaukee is focused on building and maintaining collaborative partnerships with local education systems, state and local juvenile justice agencies, and community-based organizations to meet the program and service needs of youth, with a particular focus on serving youth who are the highest risk of needing intervention to successfully transition into the Milwaukee workforce. The Coordinating Council serves as the vehicle for convening youth servicing agencies, educators and community based organizations and others who convey information to parents, participants and community members.

Through partnerships with the City of Milwaukee, Milwaukee County, Wisconsin Department of Corrections, Milwaukee Public Schools, Milwaukee Area Technical College (MATC), private and non-profit business partners, and community-based youth serving agencies, Employ Milwaukee has established a network of services and programs that are able to address at risk youth. Employ Milwaukee's local partners are focused on serving the largest urban area in the state, including the intense concentration of families and youth living in poverty.

Employ Milwaukee youth programs are designed with awareness and capacity to serve youth connected to or exiting the foster care system, youth with disabilities, youth who involved with corrections and the criminal justice systems, as well as youth who have experienced risk factors such as teen pregnancy, substance abuse, and dropping out of school and/or who have poor academic achievement.

Employ Milwaukee has a long-term commitment to the development of Milwaukee County youth through effective workforce development programs, with a special focus on preparing youth for the world of work. The Earn and Learn Summer and WIOA year round work experience reflect participation of over 100 local non-profit organizations and private sector businesses that provide work experience and program support. In coordination with Milwaukee Public Schools, Employ Milwaukee staff also works closely with teachers and guidance counselors to address the employment needs of youth and youth with disabilities, while school staff interact directly with parents and Parents Teacher Associations (PTAs).

**9. Describe how the local board will ensure that each participant be provided information on the full array of applicable or appropriate services that are available through the local board or other eligible providers or one-stop partners.**

Employ Milwaukee and its OSO ensure that youth customers at the job centers are providing with information about available services through job center partners. WIOA case managers review a checklist of all available services to maximize the education and career choices for Youth Program participants.

**10. Describe how the local board will partner with the following programs to serve youth and young adults through the Youth Program:**

**a. YouthBuild**

- b. **AmeriCorps**
- c. **Job Corps**
- d. **Youth Apprenticeship**
- e. **Registered Apprenticeship**

**YouthBuild:** Employ Milwaukee operates YouthBuild, which ensures coordination is seamless and provides ease for enrolling WIOA Youth Program participants into YouthBuild. WIOA providers and staff are required to screen youth for all programs that may be eligible to receive services and select the most appropriate based on eligibility and interest. WDA 2 YouthBuild partners are the Housing Authority of the City of Milwaukee (HACM), Milwaukee Christian Center (MCC), and Northcott Neighborhood House (NNH). All partners are contracted with Employ Milwaukee to coordinate all YouthBuild Services, GED classes, Leadership Development activities, Literacy/Numeracy Skills - Tutoring, and Construction Skills certifications.

**AmeriCorps:** The MCC has an AmeriCorps-funded YouthBuild program and all MCC/Employ Milwaukee YouthBuild participants are co-enrolled into AmeriCorps. Information about AmeriCorps is also shared with other interested program participants.

**Job Corps:** There is a Job Corps Center located on the Northwest side of Milwaukee. The Milwaukee Job Corps Center Director is a member of Employ Milwaukee's Workforce Development Board and Coordinating Council and assists with coordinating referrals from Employ Milwaukee programs to the Job Corps for potential co-enrollment and short-term credential training. All YouthBuild partners collaborate with Job Corps for referrals for enrollments into YouthBuild and potential post-programming placements.

**Youth Apprenticeship:** Employ Milwaukee's Career Plus Youth Apprenticeship (YA) Consortium began serving Milwaukee County in the 2016-2017 school year. Elements of this program are as follows:

- Consortium includes a steering committee including employers, nonprofits, school districts, colleges, and workforce representatives.
- High school students take related instruction in school while being matched with an appropriate employer for a youth apprenticeship.
- Employ Milwaukee helps recruit both students and employers, and trains employer mentors.
- Career Coordinators employed by Employ Milwaukee in the schools as part of the Career Plus program assist with youth apprenticeship.
- Students gain on-the-job training and experience while building sustainable career pathways.

**Registered Apprenticeship:** Employ Milwaukee is expanding apprenticeship opportunities for individuals through an American Apprenticeship grant award from the U.S. Department of Labor for a multi-state program that includes St. Louis and Detroit and DWD-DET-BAS. WDA 2 also partners with Northcott Neighborhood House through the Milwaukee Builds construction sector program. Individuals interested in pursuing a Registered Apprenticeship may do so either through the union trades apprenticeships or the Associated Builders and Contractors, Inc. (ABC) Apprenticeship Program. Individuals interested in pursuing a union trade apprenticeship can be enrolled in the Wisconsin



Regional Training Partnership (WRTP)/Building Industry Group Skilled Trades Employment Program (BIG STEP) Apprenticeship Preparatory Tutoring Program to help them prepare for the Registered Apprenticeship application process.

**11. Describe any regional efforts the local board is involved with or is planning with regarding youth initiatives.**

Representatives from the Employ Milwaukee Youth team serve on several Milwaukee youth initiatives, including Milwaukee Succeeds, Milwaukee Brighter Futures Consortium, Life Course Initiative, and Beyond the Bell.

**12. Describe how the local board will provide the fourteen required program elements for the WIOA youth program design.**

Provision of the 14 required Youth Program elements is explained in Table 14.

**Table 14: Provision of Required Youth Program Elements in WDA 2**

<b>Program Element</b>	<b>Activities/Strategies</b>
Tutoring, study skills training	Basic Skills, ESL, and GED instruction (individual and classroom), study skills; Collaboration with universities and community colleges, as well as community based educational organizations to find the right resources for Youth to provide remedial services for areas of academic deficiency as related to industry expectations
Alternative secondary school instruction or drop out services	Direct referral to drop-out recovery programs, co-enrollment and coordination of educational activities;
Paid and unpaid work experiences	Provision of paid and/or unpaid work experience in several high-demand industry sectors including healthcare and construction, Summer Earn & Learn; Participation in workforce activities will occur once clear career goals have been identified and youth has met identified benchmarks outlined in their Individual Service Strategies; There will be a liaison between the youth and employer to monitor and encourage the work experience
Occupational skills training	Numerous industry recognized certifications including Youthbuild PaCT (construction), Job Corps (construction, manufacturing, healthcare), RPP certification, OSHA
Education offered concurrently and in context	Blended education and work readiness activities and blended sector training and education
Leadership development opportunities	Activities related to peer mentoring of new OSY enrollees, participating in tobacco prevention awareness and volunteering with elementary school program; Community service, peer-centered activities, and other positive social behavior exercises; Training in soft skills
Support Services	Gift card incentives, training tuition, test and certification fees, work clothing and equipment, bus passes; Connecting youth to worksite mentors
Adult Mentoring	Recruiting and training adult mentors with to serve as career coaches; Mentor will be someone the youth is interested in, who is just in their corner, and who has life, work, or personal experience to provide motivational support
Follow-up Services	Making monthly contacts with participants, employers, social media, school visits, etc. to ensure youth is receiving services until they are stable in the workplace per WIOA requirements
Comprehensive guidance and counseling	Academic planning, career exploration, academic preparation workshops
Financial Literacy education	Holding workshops; Collaboration with local financial institutions to provide financial literacy training, credit counseling, and other services provided by qualified community partners
Entrepreneurial skills training	Holding workshops; Connecting youth with appropriate opportunities to develop and manage their own business enterprise
Labor Market and Employment Information	Providing information on area new businesses and job openings, periodically review high demand occupation trends and industry; Youth will participate in a series of activities to assist them in making career choices based on local demand, their unique skill sets and their strengths ; Career Fairs and job postings
Activities that help youth prepare for and transition to post-secondary education and training	College tours, academic planning, academic preparation workshops; Ongoing supportive and developmental services; regular contact with youth, mentoring, and career pathway coaching; Social media will be utilized to stay connected with the youth and partners to maintain communication and promote support

**13. Describe the process for reviewing and updating the Individual Service Strategy (ISS), including frequency and documentation requirements.**

The initial Individual Service Strategy is created during the enrollment process. The ISS is jointly reviewed and updated every 90 days by the case manager and participant.

**14. Specify if the local area plans to offer incentives or stipends for youth. If yes, attach the local policy (refer to WIA Policy 13-02: Youth Incentive Awards and Stipend Payment Policy for additional information).**

Employ Milwaukee used the state's WIOA Policy Update 16-01: Youth Incentive Awards Payment Policy for guidance while developing a local policy. The Employ Milwaukee Incentive Awards Payment to WIOA Youth Participants is located in Attachment T.

**15. Describe the WDB's approach to comply with the required minimum 20% expenditure for work experience. [§129(c)(4)]**

Employ Milwaukee sets aside at least 20% of its WIOA youth allocated funding for work experience activities.

**16. Provide the WDB's definition of the in-school youth eligibility criterion – "An individual who requires additional assistance to complete an educational program, or to secure or hold employment." The locally developed eligibility criterion must be specific, measurable, and different from the eligibility categories listed for the in-school youth.**

Employ Milwaukee's definition of an ISY in need of additional assistance to complete an educational program or to secure or hold employment is any youth who has one or more of the following characteristics:

- 1) Unable to complete tasks on a computer without assistance (Computer Illiteracy), determined by self-reports, test or observation method.
- 2) Has repeated at least one secondary grade level or is one year over age for grade.
- 3) Has a core GPA of less than 1.5.
- 4) Not on track for graduation: Loss of credits has resulted in student being in danger of lacking sufficient credits for graduation.
- 5) Is a previous dropout or has been suspended five or more times or expelled within the previous 12 months.
- 6) Has received court/agency referrals mandating school attendance.
- 7) Has been referred to or is being treated by an agency for a substance abuse related problem.
- 8) Has experienced a recent traumatic event, is a victim of abuse, or resides in an abusive environment as documented by a school official or professional.
- 9) Has never held a job (applies to youth 19 or older).
- 10) Has been fired from job within the 12 months prior to application (applies to youth 19 or older).
- 11) Has never held a full-time job for more than 13 consecutive weeks (applies to youth 19 or older).

These criteria are documented during the eligibility and enrollment period and are documented in ASSET as well as the participant's case file.

**17. Provide the WDB's definition of the out-of-school youth eligibility criterion – "A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment." The locally developed eligibility criterion must be specific, measurable, and different from the eligibility categories listed for the out-of-school youth.**

Employ Milwaukee's definition of an OSY who requires additional assistance to enter or complete an educational program or to secure or hold employment is any youth who has one or more of the following characteristics:

- 1) Has dropped out of a post-secondary educational program during the past 12 calendar months; or
- 2) Has a poor work history, to include no work history or having been fired from a job in the last 6 calendar months; or
- 3) Has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months between the ages of 16-24; or
- 4) Currently has an incarcerated parent(s)/guardian.

These criteria are documented during the eligibility and enrollment period and are documented in ASSET, as well as the participant case file. The case file also includes a "Youth Barrier" checklist document, which characterizes participant eligibility criteria. Each criterion is verified through case manager assessment, documentation by related professionals, and as required in the DWD Guide to Workforce Innovation and Opportunity Act (WIOA) Title I Eligibility Determination and Documentation.

**18. Attach a list of the current youth service providers.**

WIOA Youth Service Providers for WDA 2 are as follows:

- In-School Youth: Employ Milwaukee
- Out-of-School Youth: Dynamic Workforce Solutions and United Neighborhood Centers of Milwaukee (UNCOM)

**I. New Service Strategies for WDAs Failing Performance Measures**

**As required by WIOA, in response to any WDA failing to meet local performance accountability measures for Adult, Dislocated Worker, or Youth programs in any program year, the Governor (state) will provide technical assistance. Technical assistance may include assistance in the development of a performance improvement plan or the development of a modified local plan. WDAs that fail to meet local performance accountability measures for any program year must describe all new or innovative service delivery strategies the WDA has employed or is planning to employ. The description must also describe how the initiative maximizes resources, improves service levels, improves service quality, achieves better integration or improves performance levels. In addition, the initiative's general design, anticipated outcomes, partners involved and funds leveraged must be described.**

## **J. Strategies for Faith-based and Community Organizations**

### **1. Describe current or planned activities to increase the opportunities for participation of faith-based and community organizations as committed and active partners in the One-Stop delivery system.**

Employ Milwaukee currently engages participation by faith-based and community organizations through monthly meetings of the Coordinating Council. The Coordinating Council brings together local One-Stop partners and other organizations for the purpose of addressing the diverse needs of the workforce system. As members of the Coordinating Council, organizations are intrinsically linked to the One-Stop delivery system.

As the One-Stop system continues to respond to identified needs, partners continue to play an active role in connecting various constituencies served by faith-based and community organizations to the One-Stop system is sought. Experience has demonstrated that there are a substantial number of unemployed and underemployed individuals who can benefit from the programs and services offered through One-Stops; many of these individuals are connected to faith-based and/or community organizations.

Employ Milwaukee will continue to expand its network of faith-based and community organizations, and acknowledges that such a network must be educated and advised of its importance in the One-Stop system. Employ Milwaukee is committed to providing resources to ensure that members of the Coordinating Council remain committed and active partners.

### **2. Describe current or planned activities to expand the access of faith-based and community organizations' clients and customers to the services offered by the One-Stops in the WDA.**

While all job seekers can connect to the public workforce system at American Job Centers (AJC), public libraries, or by using technology such as the Job Center of Wisconsin (JCW), many Milwaukee County residents are either unaware or incapable of utilizing these connections. Using the public workforce system as the foundation, the Employ Milwaukee "Mobile Workforce Connections" Employment and Recruitment (ER) team will go to people where they gather to make the connection. The connection may be educational where ER team members explain how to obtain employment services at the AJC or demonstrate how to access skill assessment tools or to job search in JCW. The connection may also be intentional where job seekers are connected to hiring events, recruitment fairs or pre-apprenticeship training classes. ER team members will canvas communities to connect Milwaukee County job seekers to employment and training opportunities while regional employers will benefit as access to skilled workers increases throughout the Milwaukee County labor shed.

Employ Milwaukee hosts and attends community events as part of its ongoing commitment to serving the needs of the WDA. Through these and other events, staff connect on a personal level with partners to ensure that their congregations, clients, and customers connect with to One-Stop services. Increased use of social media and strategic outreach are utilized to maximize the effectiveness of disseminated information. Employ Milwaukee continually evaluates the composition of the Coordinating Council to determine if any deficiency in representation exists. Upon review and evaluation, strategic and definitive roles and responsibilities are defined, building upon the strengths of each organization.

## **VII. Service Providers and Oversight**

### **A. Selection of Service Providers**

#### **1. Describe the competitive process used to award subgrants and contracts in the local area for activities carried out under WIOA Title 1 [§108(b)(16)].**

Employ Milwaukee's Procurement Policies and Procedures, as detailed in the Employ Milwaukee Fiscal Policies and Procedures Manual (Attachment L), are followed during the competitive process used to award subgrants and contracts in the local area for activities carried out under WIOA Title I.

In spring of 2017, Employ Milwaukee undertook a procurement process to select providers for the WIOA Title I-B Adult, Dislocated Worker, and Out-of-School Youth Programs. Contracts were awarded to the following:

- Maximus –Adult and Dislocated Worker Programs
- America Works of Wisconsin- Adult and Dislocated Worker Programs
- Dynamic Workforce Solutions – OSY Program
- United Neighborhood Centers of Milwaukee (UNCOM) – OSY Program

#### **2. Describe how and where the services will be provided and who will provide them for the following types of services:**

##### **a. Career services**

Basic career services will be provided at American Job Centers in WDA 2, as coordinated by Employ Milwaukee's OSO, Maximus. The basic career services that

will be provided by the partners of the WDA 2 Job Centers, primarily DWD's Job Service (Wagner-Peyser) include:

- Determinations of whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs;
- Outreach, intake, and orientation to information and other services available through the one-stop delivery system;
- Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs;
- Labor exchange services;
- Provision of referrals to and coordination of activities with other programs and services, including those within the one-stop delivery system;
- Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas;
- Provision of performance information and program cost information on eligible providers of training services by program and type of providers;
- Provision of information about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's one-stop delivery system;
- Provision of information relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance;
- Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA; and
- Provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals seeking assistance in filing a claim.

The service providers of WIOA Title1 Adult and Dislocated Worker Individualized Career and Follow-up Services in WDA 2 are Maximus and America Works of Wisconsin. As stipulated in each contract award, subcontracted entities are responsible for providing the following services as required and referenced in TEGL 01-15:

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include diagnostic testing and use of other assessment tools;
- In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- Development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of, and information about, eligible training providers;
- Group and/or individual counseling and mentoring;
- Career planning (e.g. case management);
- Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized

employment or training, in some instances pre-apprenticeship programs may be considered as short-term pre-vocational services;

- Internships and work experiences that are linked to careers;
- Workforce preparation activities that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, or training, or employment;
- Financial literacy services;
- Out-of-area job search assistance and relocation assistance; and
- English language acquisition and integrated education and training programs.

The provision of these services are to be provided either directly or through the use of a combination of resources approved by DWD and listed on the ETPL. Services will be provided at Milwaukee job centers.

#### **b. Youth services**

Employ Milwaukee has awarded two contracts to provide WIOA Title 1 OSY services: Dynamic Workforce Solutions and UNCOM. The services they will provide include, but are not limited to:

- 1) Case management
- 2) Career counseling and planning services
- 3) Work experiences (subsidized and unsubsidized)
- 4) Short and long term occupational skills training
- 5) Referrals to registered apprenticeship opportunities
- 6) Follow-up

Services will be provided at various locations throughout WDA 2, including the American Job Centers.

### **B. Oversight and Training of Service Providers**

- 1. Describe the WDB's oversight and monitoring procedures including processes for program and fiscal monitoring, including frequency. Also include processes for ensuring quality customer service. [§107(d)(8)]**

Employ Milwaukee's Program Policy & Program Monitoring Manual for all programs was established in 2014 and is currently under review for potential additions. The manual outlines monthly and annual monitoring, and programs are tested for regulatory, program compliance, and contractual obligations. Additionally, contractors will be expected to provide monthly financial, program reports and adhere to requests of information or oversight on day-to-day operations.



**2. Provide a brief description of how the WDB will ensure the continuous improvement of eligible providers of services and ensure that such providers meet the employment needs of local employers, workers and jobseekers. [§108(b)(6)(A)]**

Employ Milwaukee takes great steps to guarantee that there is systemic, continuous improvement among service providers. Performance outcome meetings are held on a monthly basis with program case managers to review and address areas warranting attention, including ASSET input and case management issues. All State and Federal monitoring findings are reviewed with the group and specific training provided aimed at addressing the findings. In addition, all subcontractors and Employ Milwaukee staff are encouraged to attend State roundtables, webinars and other events for professional development purposes.

ASSET desk reviews are conducted on a monthly basis along with participant file reviews to determine the need for training, compliance with WIOA federal, state, and local policy. The program monitor conducts annual comprehensive monitoring and reviews of each contract to determine program performance.

Contract performance reports are generated utilizing Efforts to Outcomes (ETO) and ASSET. Case manager clinics are conducted on a monthly basis where WIOA/TRADE case managers are updated on overall WIOA performance. Employ Milwaukee's Business Intelligence Team provides ongoing training to all WIOA case managers to ensure continuous improvement. In addition, WIOA/TRADE coordination meetings are conducted to discuss overall WIOA performance and opportunities for greater collaboration to enhance program effectiveness.

Employ Milwaukee provides comprehensive ASSET training for new users. As part of new user and ongoing case management training, performance measures and outcomes are discussed and suggestions are provided for improving performance goals. In addition, the importance of data entry to ASSET on the performance measures is discussed and emphasized.

Employ Milwaukee's program managers are continually monitoring and evaluating training needs to assure ASSET data entry is timely and accurate and that performance measures are understood and goals are met. Possible topics for further state-wide training for WDB and WIOA providers by DWD are:

- 4) Case management practices and Case notes documentation;
- 5) Retention strategies for participants;
- 6) Best practices for follow up and programming/tracking;
- 7) ASSET training on the fields that impact performance;
- 8) In-depth understanding of credentials listed in ASSET; and
- 9) Paper file and data validation, including eligibility requirements.

- 3. Describe how WDB and service provider staff is trained in use of the ASSET system and the WIOA program. Also describe how WDB and service provider staff is informed of new policies (both local policies, DET issuances and DOL guidance) and training opportunities.**

Employ Milwaukee provides comprehensive ASSET training for new users. As part of new user and ongoing case management training, performance measures and outcomes are discussed and suggestions are provided for improving performance goals. Employ Milwaukee's program managers are continually monitoring and evaluating training needs to assure ASSET data entry is timely and accurate and that performance measures are understood and goals are met.

WDB staff inform appropriate team members and service providers of federal and state guidance, policies and training opportunities as they are provided through federal and state subscription lists. Summative updates are provided to the WDB, often through the Program Committee. Employ Milwaukee staff work with service providers when a local policy is being developed, prior to presenting the policy to the WDB for review, discussion and consideration.

- 4. Describe local processes for monitoring and ensuring timely and comprehensive entry of participant information into the ASSET system.**

Employ Milwaukee is committed to continuous quality and process improvement. On a monthly basis, Employ Milwaukee staff meets with service providers to address policy and program-related topics, and to provide guidance on new guidelines received from DOL, DWD, other state level WIOA partners, or Employ Milwaukee. Correspondence is issued with instructions that pertain to their respective program changes. Staff receives ongoing ASSET training and technical support on system improvements, updates, or changes.

- 5. Describe any local data systems in use to record and track participant services.**

Employ Milwaukee also uses a system called Efforts to Outcomes (ETO) to track participant and employer services for all of its programs federal, state, and local programs.

## **VIII. Performance and Accountability**

- A. If the WDB has developed performance standards, in addition to those required by WIOA, describe the criteria used to develop these local area performance standards. Describe how these standards will be evaluated and corrective actions that will be taken if the performance falls short of expectations.**

Employ Milwaukee has not determined any additional performance standards in addition to those required by WIOA, but will closely review information that is received via monitoring for effective case management, placement, and file monitoring, as well as proven and promising practices in other WDAs. That information may be used to establish additional

criteria for sub-contracted providers. All sub-contracted entities will be required to go through a corrective action process if performance is not being met.

**B. Describe how performance data will be used for local monitoring, evaluation, continuous improvement and oversight processes; and, describe the type of training for staff (and providers where appropriate), and the frequency, on ASSET and performance measures.**

Employ Milwaukee conducts, at minimum, annual formal and informal monitoring. Factors that are used for monitoring include, but not limited to: a review of performance for strong and weak areas, data validation results, and the previous year's annual monitoring, if applicable. The review includes participant file reviews, ASSET/ETO entries, and interviews with both staff and participants of the programs. A written report is developed for each provider which details of findings, areas for improvement, and best practices.

Performance data, based on ASSET, is received quarterly and contract monitors review ETO on a monthly basis. Monthly meetings are conducted with service providers to review performance outcomes. Employ Milwaukee's Program Committee recently implemented a new protocol requiring providers to report on current program design and performance at quarterly Board subcommittee meetings. Continued analysis and corrective actions will continue to improve performance measures.

Employ Milwaukee staff serve as members on the ASSET User's Groups committee and share emails, drafts materials, and solicit opinions as changes, new mandates, and enhancements are brought before the committee. ASSET training is conducted within 30 days of new hires of case managers/contract monitors. Employ Milwaukee's Program Monitoring Guide and the State WIOA File Review forms provide the standards for case file and data review by which performance is measured. Employ Milwaukee's oversight is extensive to ensure that corrective action is implemented in a timely manner.

**C. Describe how your local area's program design will maximize performance on the WIOA primary indicators of performance outlined in Section 116(b). After setting adjusted levels of performance with the State, update the Local Plan to provide the adjusted targets.**

Employ Milwaukee has succeeded in meeting or exceeding expectations of the WIA performance measures. Under WIOA, Employ Milwaukee has an opportunity to restructure service delivery to enhance programming that will lead to improved performance outcomes. The changes Employ Milwaukee has made to restructure its workforce supply and demand structure across all programs areas will lead to better coordination of training efforts, case management, and placement into employment. Further, overall coordination of the workforce system will also lead to improved performance under WIOA. Employ Milwaukee's staff is committed to streamlining efforts by creating better processes for case managers, employers, and data collection to maximize performance accountability and monitoring for internal and external stakeholders.

Employ Milwaukee's Performance Levels are located in Attachment AA.

**WIOA Local Plan  
Assurances and Signatures**

1. The WDB, including the chief elected official of the area and providers receiving funds under Title I of the Workforce Innovation and Opportunity Act, will comply with the Fiscal Controls established in Section 184 of WIOA.
2. The WDB and chief elected official assure that they will comply with the nondiscrimination and equal opportunity provisions of WIOA section 188 and implementing regulations at 29 CFR Part §38, adhere to the DET Methods of Administration for ensuring compliance, including an assurance that a Methods of Administration has been developed and implemented by the WDB and its funded sub-recipients.
3. The WDB assures that it will collect and maintain data necessary to show compliance with the nondiscrimination provisions of WIOA section 188.
4. The WDB assures that veterans will be provided priority access to employment and training activities authorized in section 134 of WIOA.
5. The WDB assures that all WIOA participants will be exposed to a full range of career choices including orienting and exposing them to training and jobs with family-supporting wages.
6. The WDB assures that financial literacy training/information is made available for all participants.
7. The WDB assures that no funds received under WIOA will be used to assist, promote, or deter union organizing.
8. The WDB assures that it will comply with sections 504 and 508 of the Rehabilitation Act of 1973, including the American's with Disabilities Act of 1990.
9. The WDB assures that it developed this plan in consultation with the business community, labor organizations, and required partners.
10. The WDB assures that funds will be spent in accordance with WIOA legislation, regulations, written DOL Guidance, Division of Employment and Training (DET) guidance and all other applicable federal and state laws.
11. The WDB assures that all WDB meeting agendas and minutes will be shared with DET staff (Local Program Liaison).
12. The WDB assures that no WIOA funds will be spent on the development or operation of any data management systems that duplicate systems provided by the State of Wisconsin, especially ASSET, WorkNet, or Job Center of Wisconsin.
13. The WDB Administrative Entity assures the development of a Continuity of Operations Plan (COOP) which outlines the methods by which the Board will function and services will be provided during a critical incident or pandemic, including:
  - Provisions for continuation of employment and training services under the WIOA and other programs or services funded by the DWD as possible during a critical incident or pandemic as well as the restoration of full services when services have had to be limited or interrupted for a period of time.
  - Oversight of the status and activity of the WDA's Job Center sites during a critical incident or pandemic, including regular status reports to DET Services COOP Branch Director or designee as required.
  - Full cooperation with the DWD, DET in the preparation or implementation of a COOP as specified, including submittal of the Board's updated COOP Plan in April of each year upon request, and participation in COOP drills such as call trees, tabletop exercises and other plan reviews as scheduled.

**Form A**

14. The WDB assures that it will comply with state program priorities and directives set out in the state plan and any subsequent modifications.

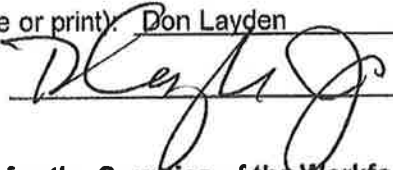
NOTE: Signatures are also required on the Certifications in the **Forms B and C**.

This plan has been developed for the Milwaukee WDA in accordance with the terms of the WIOA.

**Approved for the Workforce Development Board**

**Workforce Development Board Chair**

Name (type or print): Don Layden

Signature:  Date: \_\_\_\_\_

**Approved for the Counties of the Workforce Development Area**

**Chief Local Elected Official**

Name (type or print): Tom Barrett

Title: Mayor of the City of Milwaukee

Signature:  Date: 3/7/16

**Local Elected Officials (Optional):**

Name (type or print): \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (type or print): \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

etc., for the number of counties in the area.

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**Certification Regarding  
Debarment, Suspension, Ineligibility and Voluntary Exclusion  
Lower Tier Covered Transactions**

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This certification is required by the regulations implementing Executive Orders 12549 and 12689, 2 CFR 180. These regulations restrict awards, subawards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The regulations were published at §200.212 of Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

**BEFORE COMPLETING CERTIFICATION, READ ATTACHED INSTRUCTIONS WHICH ARE  
AN INTEGRAL PART OF THE CERTIFICATION**

- (1) The prospective recipient of Federal assistance funds certifies, by submission of this proposal, that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
  
- (2) Where the prospective recipient of Federal assistance funds is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Earl Buford, President and CEO

Name and Title of Authorized Representative

  
Signature

  
Date

## Instructions for Certification

1. By signing and submitting this proposal, the prospective recipient of Federal assistance funds is providing the certification as set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective recipient of Federal assistance funds knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the Department of Labor (DOL) may pursue available remedies, including suspension and/or debarment.
3. The prospective recipient of Federal assistance funds shall provide immediate written notice to the person to whom this proposal is submitted if at any time the prospective recipient of Federal assistance funds learns that its certification was erroneous when submitted or has become erroneous by reason of charged circumstances.
4. The terms “covered transaction,” “debarred,” “suspended,” “ineligible,” “lower tier covered transaction,” “participant,” “person,” “primary covered transaction,” “principal,” “proposal,” and “voluntarily excluded,” as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to whom this proposal is submitted for assistance in obtaining a copy of those regulations.
5. The prospective recipient of Federal assistance funds agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the DOL.
6. The prospective recipient of Federal assistance funds further agrees by submitting this proposal that it will include the clause titled “Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions,” without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may but is not required to check the List of Parties Excluded from Procurement or Nonprocurement Programs.
8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the DOL may pursue available remedies, including suspension and/or debarment.

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**CERTIFICATION REGARDING LOBBYING**

**CERTIFICATION FOR CONTRACTS, GRANTS, LOANS AND COOPERATIVE AGREEMENTS**

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

- (1) No Federal appropriated funds have been paid or will be paid by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all\* subawards at all tiers (including subcontracts, subgrants and contracts under grants, loans, and cooperative agreements) and that all\* subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 200.450 of Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

<u>Employ Milwaukee</u>	<u>WIOA Title I-B</u>
<u>Grantee/Contractor Organization</u>	<u>Program/Title</u>
<u>Earl Buford</u>	<u>11/15/16</u>
<u>Name of Certifying Official</u>	<u>Signature</u>
	<u>Date</u>





## Employ Milwaukee

### One-Stop Service Delivery System Locations

Effective July 1, 2017

<b>Comprehensive Job Center</b>			
Job Center Name and Address	Job Center Central Phone Number	Job Center Manager/Contact Phone Number Email Address	Job Center's Website
Job Center Central (Maximus) 4201 N. 27th St., Suite 400 Milwaukee, WI 53216	414.874.0318	Kathleen Crape, Job Center Manager 414.203.8546 <a href="mailto:KathleenACrape@Maximus.com">KathleenACrape@Maximus.com</a>	<a href="http://www.employmilwaukee.org/About/Programs/American-Job-Center.htm">http://www.employmilwaukee.org/About/Programs/American-Job-Center.htm</a>

<b>Affiliated Job Centers</b>		
Job Center Name and Address	Job Center Central Phone Number	Job Center Manager/Contact Phone Number Email Address
Milwaukee Southeast Job Center (UMOS) 2701 S. Chase Avenue Milwaukee, WI 53207	414.389.6607	Kathleen Crape, Job Center Manager 414.203.8546 <a href="mailto:KathleenACrape@Maximus.com">KathleenACrape@Maximus.com</a>
YWCA Southeast Wisconsin Job Center 1915 N. Dr. Martin Luther King, Jr. Drive Milwaukee, WI 53212	414.374.1800	Kathleen Crape, Job Center Manager 414.203.8546 <a href="mailto:KathleenACrape@Maximus.com">KathleenACrape@Maximus.com</a>



## **Employ Milwaukee WIOA Local Plan Publication Notice**

The Workforce Innovation and Opportunity Act (WIOA) was signed into law by President Obama on July 22, 2014 and replaced the Workforce Investment Act of 1998. The Act officially took effect on July 1, 2015. As a requirement of the new law, all Workforce Development Boards (WDBs) must create a plan that outlines their strategy to target and help with the workforce needs of the areas they serve.

Starting March 9<sup>th</sup> – April 9<sup>th</sup>, 2016 Employ Milwaukee, as required by the new law, will be taking comments for the Local Plan from the public. The Local Plan is an outline of the tasks and strategies that we will use over the next five years to address the issues and services of the workforce system, and work towards strengthening them.

The Local Plan is available through paper format upon request and posted online on our website at [www.milwaukeeewib.org](http://www.milwaukeeewib.org).

The Public Comment period is an important part of developing the Local Plan, because it provides those in the community an opportunity to give us a better understanding of what we need to do to better serve your needs and those of the city.

Listed below is the process for submitting comments:

Comments may be submitted by email to Leslie Silletti, Vice President of Policy and Fund Development, [Leslie.Silletti@milwaukeeewib.org](mailto:Leslie.Silletti@milwaukeeewib.org), by phone (414) 270-1700, or by mail to Employ Milwaukee, located at 2342 N. 27<sup>th</sup> St, Milwaukee, WI 53210.

THANK YOU



**Public Comments Expressing Disagreement with  
WIOA Local Plan and WDB Response**

April 13, 2016

Secretary Ray Allen  
Department of Workforce Development  
Division of Employment and Training  
P.O. Box 7972, Room G100  
Madison, Wisconsin 53707

Dear Secretary Allen,

Consistent with the Wisconsin Department of Workforce Development (DWD) Local Plan guidelines, Employ Milwaukee made the WDA 2 Local Plan available for public comments in Milwaukee county. Copies of the Local Plan were made available to the public through local news media and local websites. Members of the public and the WDB, including business and labor organizations, had a thirty (30) day period to comment on the Plan. Employ Milwaukee also made information about the Plan available to the public on a regular basis through open meetings.

The attached public comments on Employ Milwaukee's Local Plan were received by the following organizations: Wisconsin Department of Vocational Rehabilitation, Wisconsin Regional Training Partnership/Building Industry Group Skilled Trades Employment Program, and the Community Work Partnership.

We feel Employ Milwaukee's Local Plan is comprehensive and addresses the public comments, as written. We have acknowledged receipt to the organizations that have commented and plan to incorporate their recommendations through implementation strategies, as appropriate.

Sincerely,

A handwritten signature in black ink that reads "Earl Buford". The signature is written in a cursive, flowing style.

Earl Buford  
President and CEO



April 8, 2016

Leslie Silletti, Vice President  
Employ Milwaukee  
2342 N 27<sup>th</sup> Street  
Milwaukee, WI 53210

[Leslie.Silletti@milwaukeeewib.org](mailto:Leslie.Silletti@milwaukeeewib.org)

**RE: 2016-2020 WIOA Local Plan Comment**

On behalf of WRTP/BIG STEP, an industry driven workforce development intermediary, we appreciate the ability to review and provide feedback to Employ Milwaukee's Local Plan. As a nationally recognized workforce development intermediary and strong proponent of the Registered Apprenticeship system, we have a special capacity to view elements of the Plan which focus on career pathway development, sector needs and the interface and growth of apprenticeships as a way to develop middle skills careers. Our mission is to, "enhance the ability of private sector organizations to recruit and develop a more diverse, qualified workforce in construction, manufacturing and emerging sectors of the regional economy." In this role, we understand that an important function we play to help provide a bridge between industry and the formal, governmental workforce system.

- The WIOA Local Plan should define the role of Employ Milwaukee as critical to building and investing WIOA resources into the capacity of workforce development intermediary structures, including WRTP/BIG STEP, to provide industry driven and responsive workforce development strategy. The WIOA Local Plan currently defines Employ Milwaukee as a workforce development intermediary - we respectfully disagree and recommend a clear definition of the role of the workforce investment board and industry recognized intermediary organizations be more clearly defined.
- The WIOA Local Plan should adopt and make investment into the Regional Sector Center innovation model being piloted by WRTP/BIG STEP as well as several other similar efforts in major urban areas where scaled response to industry is critical to economic development.
- The new WIOA legislation specifically eliminates previous sequencing of services to better ensure responsiveness to industry as well as workers and job seekers. Increasingly, public policy articulates and mandates workforce program and investment that operates in alignment with business cycles and demands. To these ends we strongly recommend the WIOA Local Plan reflect the innovation within the One Stop Job Center system as well as streamline partnership and funding agreements for intermediaries, including Employer Services Agreements, to provide rapid WIOA enrollment, training/education services, and direct employment attachment for eligible individuals.

WRTP/BIG STEP is a key intermediary for the construction and manufacturing sectors in our region. We provide the outreach and recruitment focus for the building & construction trades. We are currently recognized as the primary source provider of quality candidates for apprentice candidates for the 18 trades covered by the Milwaukee Building and Construction Trades Council. In addition to the work we do in construction, we have strong industry links in the industrial and energy sectors. An example of our responsiveness to industry is our work in helping create and gain acceptance of the innovative Industrial Manufacturing Technician (IMT) Apprenticeship.

3841 W. Wisconsin Avenue, Milwaukee, WI. 53208  
Phone: (414) 342-9787  
Fax: (414) 342-3546  
[www.wrtp.org](http://www.wrtp.org)



Based on our experience, we hope you will consider adding the following elements in your Local Plan and policies and procedures:

- Designate WIOA funding and procedures allow for the kind of time and investment needed to help individuals build an application, enter and succeed in Registered Apprenticeships.
- Provide recognition, ideally financial, to the significant investment the private sector makes when they sponsor a Registered Apprenticeship. These costs can include instructional costs, wages paid for on-the-job learning, wages paid to journeymen who provide the training and other investments. These expenses and obligations are often viewed as barriers for sponsorship and foster a belief that only “big employers” have the capacity to sponsor a Registered Apprenticeship program.
- Structure and encourage training of One-Stop staff on the advantages and requirements of Registered Apprenticeship, Our experience has shown that most Case Managers and Business Servicers know little about apprenticeships, their requirements, as well as the advantage to the apprentice. This kind of information needs to be generally shared and understood.

To assure our local area can provide the kind of innovative, career pathway focused approach that underlies the WIOA vision, we suggest the following changes to the Employ Milwaukee Local Plan:

- Assure that funding will be available for incumbent training services. If funds are limited to only unemployed, or underemployed with another employed, employers may have difficulty in sustaining training that is needed for ongoing development and support of career pathways.
- Provide further support to the Registered Apprenticeship system. Your currently plan focuses on marketing, but employers and sector partners will need to be provided technical assistance. Your WIOA funding stream should also provide for the ongoing funding of apprentices which may take several years to complete their apprenticeships.
- Recognize WRTP/BIG STEP’S unique, nationally recognized, and important role is as an industry intermediary for the construction and manufacturing sectors. Outlining our role and capacity in the Plan can help readers understand how Milwaukee is prepared to meet many of the innovative challenges posed by WIOA such as development of career pathways, emphasis on industry leadership and utilization of Registered Apprenticeship as the best method to link individuals to middle skill careers.

Thank you for your consideration of this feedback. We look forward to continuing to work with you and help meet the workforce development needs of Milwaukee County.

Sincerely,

A handwritten signature in blue ink that reads 'Mark E. Kessenich'.

Mark Kessenich  
President & CEO

## COMMUNITY WORKFORCE PARTNERSHIP

April 9, 2016

Leslie Silletti  
Vice President  
Employ Milwaukee  
2342 N 27<sup>th</sup> Street  
Milwaukee, WI 53210  
[Leslie.Silletti@milwaukeeewib.org](mailto:Leslie.Silletti@milwaukeeewib.org)

### **RE: Community Workforce Partnership 2016-2020 WIOA Local Plan Comment**

We, the leadership of fourteen organizations serving thousands of City and County of Milwaukee residents, united under the Community Workforce Partnership (CWP) collaborative, have the following recommendations relating to *Employ Milwaukee's 2016-2020 WIOA Local Plan*. Based on our many years of experience in working with the broadest range of Milwaukeeans, we have identified the following areas we respectfully wish you to further address in the *Employ Milwaukee's Local Plan*:

#### ***1) Targeted response to African-American & Latino male unemployment***

Highlight the fact that African-American and Latino male unemployment and underemployment is an issue that requires a strategic approach by the major workforce funding organization in Milwaukee- Employ Milwaukee. We request that *Employ Milwaukee's Local Plan* describe and designate resources to help improve the current levels of unemployment and underemployment and a funding focus to help diminish the multiple barriers African-American and Latino males in our community confront in gaining family-sustaining jobs. We recommend that you provide a "plan" to address the need to help this important segment of our population better link to career pathways, skills, supportive services, jobs and family-sustaining careers. This plan should provide detailed explanation of how individuals will be assisted to succeed even if they are starting at a low skill level. The strategy should also focus on a broad range of needs and services to help individuals in this group succeed.

#### ***2) Increased emphasis on Transitional Jobs***

WIOA funding should be used to fund and secure Transitional Jobs (TJs) programs up to the maximum percentage allowed by WIOA. TJs have been demonstrated to be an effective and powerful tool to help link individuals to jobs, particularly those who deal with long-term unemployment. Employ Milwaukee can demonstrate through its WIOA Plan and implementation that TJs can be utilized to provide a transition to career pathways and connected to a specific industry sector.

#### ***3) Acknowledging the role the CWP***

Though less than two years old, the CWP has coalesced a wide range of community and service providing organizations which have a strong interests in linking their participants to family-sustaining careers. We request the *WIOA Local Plan* recognized the integral role of the CWP in planning and implementing programs to address the workforce development needs of the community. Our organizations represent a wide range of services in our community (a listing is

found in Attachment A). As the CWP, we have jointly agreed to collaborate and improve the workforce opportunities for those we serve. The leaders of our organizations agree that working collaboratively and increasing system efficiency are crucial in these days of lessened resources and growing community need. We are uniting as both leaders and with our staff to: further information and articulate community needs; provide effective and targeted responses; collaborate in more efficient provision of services; and, educate government and funding leaders on the capacity, needs and gaps necessary to meet community workforce needs. We request that you acknowledge our capacity and role.

**4) Designate WIOA Funding Priorities to meet our community's needs**

The proposed WIOA Plan should emphasize the importance you will be placing on training and education, particularly of individuals with low skills. Specifically, WIOA funds should be designated and aligned to address legal barriers to employment, specifically driver's license recovery. Investments in adult basic education and programs supporting the attainment of GED/HSED, enhanced employment readiness and apprenticeship readiness programs, financial literacy and supportive services are also essential to a functioning pipeline of workers for those WIOA is designed to serve. This Plan could also align how these education/ training strategies can dovetail with a robust Transitional Jobs program to provide access to employment to those who currently find themselves unable to enter the world of work. We also request that the plan and the funding decisions place an emphasis on Supportive Services. WIOA funding can play an essential role in filling service gaps and help an individual succeeding in their WIOA placement.

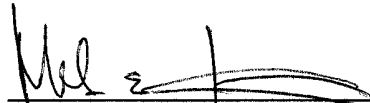
Thank you for this opportunity to provide feedback to this very important document, the WIOA Local Plan. We know this Plan will guide policy and decision-making in our community for the next four years. We look forward to collaborating with you and providing you any needed information to assist you as we move our community forward,

On behalf of all the members of the Community Workforce Partnership,



Mac Weddle, Executive  
CWP Co-Chair

Date: 4-8-16



Mark Kessenich, CWP,  
CWP Co-Chair

Date: 4-8-16

## **ATTACHMENT A**

### **Community Workforce Partnership Member Organizations and Leadership**

#### **Milwaukee Community Service Corps**

George Leutermann, Executive Director

#### **Northcott Neighborhood House**

Mac Weddle, Executive Director

#### **Riverworks Center**

Darryl Johnson, Executive Director

#### **Urban League**

Ralph Hollmon, President & CEO

#### **Milwaukee Christian Center**

Karen Higgins, Executive Director

#### **Journey House**

Dr. Michele Bria, CEO

#### **Wisconsin Community Services**

Clarence Johnson, Associate Director

#### **Literacy Services of Wisconsin**

Ginger Duiven, Executive Director

#### **Milwaukee JobsWork**

Michael Adams, Director of Employee Development

#### **Central City Churches**

Teresa Thomas-Boyd, Executive Director

#### **United Migrant Opportunities Services – UMOS**

Lupe Martinez, President & CEO

#### **WRTP/BIG STEP**

Mark Kessenich, President & CEO

#### **YWCA of Southeast Wisconsin**

Paula Pennebaker, President & CEO

#### **The Social Development Commission – SDC**

George Hinton, CEO



**From:** "Collins-Worachek, Lea - DWD" <[Lea.CollinsWorachek@dwd.wisconsin.gov](mailto:Lea.CollinsWorachek@dwd.wisconsin.gov)>  
**Date:** April 6, 2016 at 3:29:32 PM CDT  
**To:** ""[leslie.silletti@milwaukee.wib.org](mailto:leslie.silletti@milwaukee.wib.org)"" <[leslie.silletti@milwaukee.wib.org](mailto:leslie.silletti@milwaukee.wib.org)>  
**Subject:** FW: WIOA Local Plan

Hello Leslie,

I would like to submit the following comments for consideration related to the draft WIOA Local Plan for Employ Milwaukee, Wisconsin Workforce Development Area 2. Thank you.

#1: I. Workforce Needs, Labor Market Analysis, and Assessment of Workforce Investment Activities and Assets (b. Job Seekers, page 2)

Comment: Add more language on people with disabilities such as labor participation pool –"the unemployment rate among workers with disabilities is double the average population, according to the U.S. Labor Department's Office of Disability Employment Policy, or ODEP. Workers with disabilities offer a great value proposition."

#2: I. Workforce Needs, Labor Market Analysis, and Assessment of Workforce Investment Activities and Assets (d. Youth, page 4)

Comment: Mention how people with disabilities as a subgroup of youth are in need of services.

3: IV. One-Stop System and Service Delivery – Section #13 - Describe the connection between the local board WIOA Youth Program and the Job Center service delivery system, page 36

Comment: There is no reference to Vocational Rehabilitation. The Division of Vocational Rehabilitation (DVR) has a tri-agency Interagency Agreement the Departments of Public Instruction (DPI) and Health Services (DHS). The agreement is designed to create a common understanding, and establish collaborative efforts regarding services that will ultimately improve employment outcomes for students with disabilities who may be eligible for DVR services. New federal mandates require that DVR, in collaboration with local educational agencies offer to transition age high school students with disabilities (ages 14-21) Pre-Employment Transition Services (PETS) using 15% of VR federal allocation on an annual basis. PETS services include: job exploration counseling, work-based learning experiences, counseling on opportunities in comprehensive transition or enrollment in postsecondary educational programs, and workplace readiness training to develop social skills and independent living instruction in self-advocacy/peer mentoring.

#4: Individuals with Disabilities, page 14

Comment: Include that people with disabilities are subgroups of the categories indicated in Section 3 beginning on page 13. Possible collaboration with DVR may include employment planning consultation or coordination of services of individuals co-enrolled in other programs such as TANF, veterans programs, local schools, Department of Corrections, etc.

#5: Assessment of Current Workforce Investment Activities in the Local Area (C1. page 16)

Comment: Common application process is described with no details. It would be helpful to provide this detail in local plan.

#6: Strategies to identify business requirements within the local area; assessment of services to employers (C3, C4, pages 17-18)

Comment: Include that DVR Business Services Consultants develop relationships with Wisconsin businesses and help employers recruit, hire and retain people with disabilities. DVR business innovations

include place to train models such as a partnership with Walgreens Retail Employees with Disabilities (REDI) which provides training for individuals with disabilities in a retail setting.

#7: Vision and Workforce Development Area Goals (pages 18-19)

Comment: There is a description of system-wide technology; however, it is unclear how the core partners will participate. Does indicate management tools that track job seekers and business customers; however, it is a separate system from the Job Center of Wisconsin, ASSET and Salesforce?

#8: Section VI. #4 – Compliance with ADA (page 31)

Comment: Add language on physical accommodations for services. The plan only addresses the EEOC and Civil Rights Compliance, not the ADA.

#9: Identifying business requirements (#8, page 34)

Comment: Add DVR's participation through business services consultants.

#10: Table 10 Menu of Services (page 33)

Comment: DVR should be added for provision of referrals to and coordination of activities...within the one-stop delivery system.

#11: Information Technology (IT) systems in the local area (#18, page 37)

Comment: Add "The Talent Acquisition Portal (TAP) is an online system which includes both a national talent pool of Vocational Rehabilitation (VR) candidates seeking employment and a job posting system for businesses looking to hire individuals with disabilities."

#12: System used to track participate services (c. page 38)

Comment: Should include Integrated Rehabilitation Information System (IRIS) which is DVR's participant computer record tracking system.

#13: Mechanisms for microenterprise and entrepreneurial training (#5, page 44)

Comment: Add that DVR can provide these services to eligible VR participants.

#14: Form D: One Stop Service Delivery System: Locations (page 85)

Comment: No mention of DVR's locations at 7900 W. Burleigh St., Milwaukee 53222 and 1205 S. 70<sup>th</sup> Street, Suite 201, West Allis 53214

Thank you,

Lea Collins-Worachek, MS, CRC  
Director, Workforce Development Area #2  
Division of Vocational Rehabilitation  
2701 S. Chase Avenue, Suite D  
Milwaukee, Wisconsin 53207  
Direct: (414) 389-6452  
Cell: (414) 405-0641  
Fax: (414) 389-6491  
[lea.collinsworachek@dwd.wisconsin.gov](mailto:lea.collinsworachek@dwd.wisconsin.gov)

# City of Milwaukee

Office of the City Clerk

200 E. Wells Street

Milwaukee, Wisconsin 53202

Certified Copy of Resolution

**FILE NO: 170053**

**Title:**

**Substitute resolution relating to required agreements between the Mayor, designated local elected officials, and Employ Milwaukee, Inc., pursuant to the Workforce Innovation & Opportunity Act (WIOA).**

**Body:**

Whereas, The federal Workforce Innovation and Opportunity Act of 2014 is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy; and

Whereas, The Mayor of the City of Milwaukee and the Milwaukee Area Workforce Investment Board have entered into prior agreements to summarize each of their specific duties with regard to efforts and activities in the areas of job training and employment, workforce development and human resource development, pursuant to the Workforce Investment Act of 1998, and the superseding Workforce Innovation and Opportunity Act of 2014; and

Whereas, Pursuant to those agreements, the Milwaukee Area Workforce Investment Board has served as the local grant sub-recipient and administrative entity under the terms of the Workforce Investment Act of 1998 and the Workforce Innovation and Opportunity Act of 2014 to implement job training and employment programs within Milwaukee County; and

Whereas, The City undertakes ongoing efforts to provide job training and youth employment and to promote economic development and utilization of human resources; and

Whereas, The Milwaukee Area Workforce Investment Board is now known as Employ Milwaukee; and

Whereas, Employ Milwaukee has unique expertise in the areas of job training and workforce development; and

Whereas, The City and Employ Milwaukee desire to enter into an agreement to delineate and fulfill their respective duties under the Workforce Innovation and Opportunity Act of 2014; now therefore, be it

Resolved, By the Common Council of the City of Milwaukee, that the Sixth Amended and Restated Memorandum of Agreement Between the Mayor of the City of Milwaukee and Employ Milwaukee, Inc. in substantially the same form as is attached to this file is approved, and the proper City officers are hereby authorized and directed to execute the Agreement on behalf of

Certified Copy of Resolution 170053

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the City of Milwaukee.



I, James R. Owczarski, City Clerk, do hereby certify that the foregoing is a true and correct copy of a(n) Resolution Passed by the COMMON COUNCIL of the City of Milwaukee, Wisconsin on May 9, 2017.

---

James R. Owczarski

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May 24, 2017

Date Certified



**SIXTH AMENDED AND RESTATED MEMORANDUM OF AGREEMENT BETWEEN THE  
MAYOR OF THE CITY OF MILWAUKEE  
AND EMPLOY MILWAUKEE, INC.**

This is an agreement ("Agreement") dated as of July 1, 2017 between Tom Barrett, Mayor and Chief Elected Official of the City of Milwaukee (the "Mayor") and Employ Milwaukee, Inc. ("Employ Milwaukee") to effect job training and employment programs, including those programs operated under the Workforce Innovation Opportunity Act ("WIOA").

The Mayor is the appointing authority for the Employ Milwaukee Board under 29 U.S.C. 3122, §107(c) of the Workforce Innovation Opportunity Act (hereinafter referred to as "WIOA"), 29 U.S.C. §3101, et seq.

**RECITALS**

The Mayor is the Chief Elected Official of the City of Milwaukee and the appointing authority for the Employ Milwaukee Board under §107(c) of the WIOA, 29 U.S.C. §3122; and

Whereas, the mayor and Employ Milwaukee are desirous of entering into this Agreement to effectuate the WIOA;

NOW, THEREFORE, in consideration of the mutual covenants set for the herein, the Mayor and Employ Milwaukee agree as follows:

**I. TERM**

The term of this Agreement shall commence as of the date of execution and shall continue in force until June 30, 2019. This Agreement shall act to repeal and supersede any and all prior agreements, and shall be automatically renewed for two-year periods unless either party gives written notice of its intention not to renew at least 60 days prior to the date of expiration. This Agreement shall also terminate upon the earlier of:

- A. Changes in federal law prohibiting or rendering such agreements ineffectual;
- B. Repeal of WIOA or loss of federal funding for WIOA projects;

- C. The execution of an agreement between the Mayor and any other "chief elected official," as that term is defined at 29 U.S.C. § 3102(9), pursuant to 29 U.S.C. § 3122(c)(1)(B).

## II. SCOPE

This Agreement shall govern and apply to job training and employment programs under WIOA and such other programs as may be mutually agreed upon.

## III. DUTIES

- A. The Mayor designates Employ Milwaukee to serve as local grant subrecipient under 29 U.S.C. §3122(d)(12)(B)(i)(II) and for such other programs as may be mutually agreed upon.
- B. Designation and Membership of the Local Area Board.
1. The Mayor submitted the request for initial designation of the workforce development area and consulted with the Governor on the initial designation of the Workforce Development Area pursuant to WIOA.
  2. In accordance with the requirements established by the Governor and the criteria established under 29 U.S.C. §3122(b), the Mayor appoints the members of the local board ("Local Board") from the individuals nominated or recommended to be such members. 29 U.S.C. §3122(c)(1)(A).
  3. The Local Board, in consultation with the Mayor, shall request subsequent designations as they become necessary. 29 U.S.C. §3121(b)(3).
- C. Local and Regional Planning.
1. The Mayor shall work with the Local Board to develop and submit to the Governor a comprehensive 4-year local plan that is consistent with the State plan and in conformance with 29 U.S.C. §3123. 29 U.S.C. §3122(d)(1).
  2. If required in the future, the Mayor and the Local Board shall consult with the State to identify regions, consistent with the considerations described in 29 U.S.C. §3121(b)(1)(B). 29 U.S.C. §3121(a)(1).
  3. The Mayor and the Local Board shall engage in a regional planning process and prepare, submit, and obtain approval of a single regional plan consistent with the requirements in 29 U.S.C. §3121(c).
- D. Budget and Grant Administration Responsibilities.

1. The Mayor and the Local Board shall use funds allocated to the local area by the state and use nonfederal funds available to the local area that the Mayor and Local Board determine are appropriate and available for that use, in fulfillment of its responsibilities under WIOA. 29 U.S.C. §3131.

2. The Mayor shall review and approve the Local Board's budget for the activities of the Local Board. 29 U.S.C. §3122(d)(12)(A).

3. At the direction of the Local Board, Employ Milwaukee shall disburse those funds allocated to the local area by the state and such nonfederal funds available to the local area pursuant to 29 U.S.C. §3122(d)(12)(B)(ii) that the Mayor and the Local Board determine area appropriate and available for Workforce Innovation and Opportunity Activities, pursuant to the requirements of 29 U.S.C. §3122(d)(12)(B)(i)(III).

E. Program Oversight.

1. The Mayor will work with the Local Board to conduct oversight of youth activities programming authorized under 29 U.S.C. §3164(c), local employment and training activities authorized under 29 U.S.C. § 3174(b),(c) and (d), and the one-stop delivery system in the local area; and together the Mayor and the Local Board will ensure the appropriate use and management of the WIOA funds provided for these activities and one-stop delivery system(s); and for workforce development activities, the Mayor and the Board will work together to ensure the appropriate use, management and investment of funds to maximize performance outcomes for local areas under section 29 U.S.C. §3141. 20 U.S.C. § 3122(d)(8).

2. With the agreement of the Mayor, and consistent with 29 U.S.C. §3151(d), the Local Board shall competitively designate or certify One Stop Operators, as described in 29 U.S.C. §3151(d)(2)(A) or terminate for cause the eligibility of such operators. 29 U.S.C. §3122(d)(10)(A).

3. The Mayor shall review and approve a Memorandum of Understanding between the Local Board and the One Stop Partners, relating to the operation of the One Stop delivery system in the local area, consistent with the requirements in 29 U.S.C. §3151(c)(2). 29 U.S.C. §3151(c)(1).

4. With the agreement of the Mayor, the Local Board will conduct oversight of the one-stop delivery system pursuant to 29 U.S.C. §3151(a)(3) and consult with the State as it establishes objective criteria and procedures used to evaluate the operation of the one-stop center as described in 29 U.S.C. §3151(g).

5. The Mayor shall consult with the Local Board, the One Stop Operator, and the One-Stop Partners regarding funding of the One-Stop infrastructure as described in 29 U.S.C. §3151(h).

6. The Mayor and the Local Board shall consult with the Governor as the Governor establishes guidance for infrastructure one-stop funding pursuant to 29 U.S.C. §3151(h)(1)(B) and determines funding as described in 29 U.S.C. §3151(h)(2)(C).

7. The Mayor and the Local Board shall consult with the Governor as the Governor determines funding allocation for youth activities and statewide workforce investment activities under 29 U.S.C. 3162(b)(1)(C), 29 U.S.C. §3163(b).

8. The Mayor and the Local Board shall consult with the Governor as the Governor determines funding allocation for adult employment and training activities and statewide workforce investment activities under 29 U.S.C. 3172(b)(1)(B), 29 U.S.C. §3173(b)(1).

F. Performance Measurements.

1. The Mayor shall work with the Local Board and the Governor to negotiate and reach agreement on local performance measures. 29 U.S.C. §3122(d)(9).

2. The Mayor and the Local Board shall determine whether to appeal a gubernatorial reorganization determination made under 29 U.S.C. §3141(g)(2)(A) to the Governor under 29 U.S.C. §3141(g)(2)(B)(i) and to the Secretary of the U.S. Department of Labor under 29 U.S.C. §3141(g)(2)(B)(ii).

#### IV. OPEN MEETINGS AND PUBLIC RECORDS

A. The provisions of Subchapter V, Chapter 19 of the *Wisconsin Statutes* regarding open meetings of governmental bodies shall apply to all meetings and proceedings of Employ Milwaukee. 29 U.S.C. 3122(e) and 20 CFR §679.390.

B. The Mayor and Employ Milwaukee, including but not limited to the Local Board, understand that the City of Milwaukee is bound by the Wisconsin Public Records Law, and as such, all of the terms of this Agreement are subject to and conditioned on the provisions of Wis. Stat. §19.21 et. seq. The Local Board acknowledges that it is obligated to assist the City in retaining and producing records that are subject to the Wisconsin Public Records Law, including such records that are generated by the Local Board and Employ Milwaukee as a consequence of this Agreement, and that the failure to do so shall constitute a material breach of this Agreement, and that the Local Board and Employ Milwaukee must defend and hold the City harmless from liability due to either the Local Board or Employ Milwaukee's fault under that law. Except as otherwise authorized, those records shall be maintained for a period of seven years.

#### V. LIABILITY



Employ Milwaukee agrees that it will at all times during the term of this Agreement keep in full force and effect both Comprehensive General Liability and Directors & Officers Liability policies, to the maximum extent permissible as allowable costs, issued by a company or companies authorized to do business in the state of Wisconsin, and licensed by the Wisconsin Commissioner of Insurance, with General Liability coverage provided for therein in the amount of \$2,000,000 and Directors & Officers Liability in the amount of \$4,000,000. The Mayor shall be named as an additional insured. Coverage must remain in effect for a period of not less than two years beyond the termination date of the contract. If a claims-made form is used and a change of insurer occurs during the contract period, continuity of coverage must be maintained by either retaining the original retroactive date or exercising the extended reporting period endorsement option from the expired policy for a period of not less than two years, if the replacement insurer will not preserve the original retroactive date. The Mayor shall be given at least ten (10) days written notice of cancellation or nonrenewal during the term of this Agreement. In the case of cancellation or nonrenewal, Employ Milwaukee will immediately obtain new coverage so that no lapse in coverage occurs for any length of time. Upon execution of this Agreement, Employ Milwaukee shall furnish the Mayor with certification of insurance and, upon request, certified copies of the required insurance policies. In the event that any action, suit or other proceeding is brought against the Mayor upon any matter covered in said policies the Mayor shall, within ten (10) working days, give notice thereof to Employ Milwaukee and Employ Milwaukee shall cooperate with the Mayor in the defense of the action, suit or other proceeding. Irrespective of any other term of this Agreement, this provision shall survive termination of this Agreement.

#### **VI. DISAGREEMENTS**

It is expressly understood and agreed to by the parties that any disagreement or controversy as to the interpretation of the requirements and activities described herein shall be submitted to the Wisconsin Department of Workforce Development (DWD) for resolution. The decision by DWD shall be controlling.

#### **VII. NOT A LIMITATION ON LOCAL BOARD'S DUTIES UNDER WIOA**

This Agreement shall not be construed to limit or expand Employ Milwaukee or the Local Board's duties and obligations under WIOA, nor shall it be construed to shift any statutory liability of Employ Milwaukee or the Local Board onto the Mayor. This Agreement shall not be construed to represent an exhaustive list of all duties and obligations placed on the Mayor, Employ Milwaukee and the Local Board, respectively, by WIOA.

#### **VIII. CONFLICT OF INTEREST.**

- A. No officer, employee, or agent of the City who exercises any functions or responsibilities in connection with the carrying out of any services or requirements to which this Agreement pertains, shall have any personal interest, direct or indirect, in this Agreement. No member of the governing body of the City and no other public official the City who exercises any functions or responsibilities in the review or approval of the

carrying out of this Agreement shall have any personal interest, direct or indirect, in this Agreement.

- B. Employ Milwaukee covenants that it presently has no interest, and shall not acquire any interest, direct or indirect, which would conflict in any manner or degree with the performance of its services hereunder. Employ Milwaukee further covenants that in the performance of this Agreement no person having any conflicting interest shall be employed. An interest on the part of the Local Board or Employ Milwaukee's employees must be disclosed to the City.

#### **IX. NONDISCRIMINATION.**

- A. Employ Milwaukee agrees not to discriminate against any qualified employee or qualified applicant for employment because of sex, race, religion, color, national origin or ancestry, age, disability, lawful source of income, marital status, sexual orientation, gender identity or expression, past or present membership in the military service, familial status, or based on affiliation with or perceived affiliation with any of these protected categories.
- B. This requirement shall apply, but not be limited to, the following: tenure, terms or conditions of employment, promotion, demotion or transfer, recruitment or recruitment advertising, employment rules and policies, lay-off or termination, rates of pay or other forms of compensation, and selection for training including apprenticeship.
- C. No person in the United States shall, on the grounds of race, color, religion, sex, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity made possible by or resulting from this Agreement. The City and Employ Milwaukee will comply with all requirements imposed by or pursuant to the regulations of the appropriate federal agency effectuating Title VI of the Civil Rights Act of 1964.
- D. Employ Milwaukee agrees to comply with all applicable requirements of the Americans with Disabilities Act of 1990, 42 U.S.C. 12101, et seq.
- E. Employ Milwaukee will cause the foregoing provisions to be inserted in all subcontracts, if any, for any work covered by this Agreement so that such provisions will be binding upon each subcontractor, provided that the foregoing provisions shall not apply to contracts or subcontracts for standard commercial supplies or raw materials.

#### **X. AMENDMENTS**

This Agreement may be amended or restated as necessitated by any changes in the Workforce Innovation and Opportunity Act. Additionally, amendments may be made at any time with the consent of both parties and such amendments shall be consistent with the requirements of the Workforce Innovation and Opportunity Act.

In witness whereof, the Mayor and Employ Milwaukee execute this Agreement:

Tom Barrett 5/10/17  
Tom Barrett, Mayor Date  
Mayor of the City of Milwaukee

[Signature] 5/20/2017  
Name: Date  
Employ Milwaukee, Inc.

Approved as to form and execution:

[Signature] 5/25/17  
Assistant City Attorney Date

1077-2017-681:238206.1

Milwaukee Area  
**WORKFORCE**  
INVESTMENT BOARD, INC.



*Milwaukee Area Workforce Investment Board*

**MAWIB**  
*Employee*  
**HANDBOOK**





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## 1. INTRODUCTION

### *Letter to Our Employees from the Board of Directors*

Dear Employee:

Welcome to the Milwaukee Area Workforce Investment Board, hereinafter referred to as “MAWIB” or the “Agency.” We are glad you have joined our team. Because of your experience and training, we believe you will make a contribution to the overall mission of MAWIB.

The value of employees who make up the organization is an important part in the continued success of the Agency. Every effort is made to recognize the importance of each position and the value of each employee. Our policy is one of equal opportunity for every person.

This Employee Handbook has been prepared to be an informative guide to the general policies, practices, procedures, benefits, rules and regulations of MAWIB. It has been prepared to acquaint all employees with these areas and to provide for the orderly, efficient and smooth operation of our Agency. None of the statements, policies, procedures, rules or regulations contained here constitute a guarantee of employment, nor should you, the employee, construe it as a guarantee of any rights or benefits, or a contract of employment, expressed or implied. All employees are employed ‘AT-WILL’ and employment is not for any definite period. This means your employment with MAWIB is voluntarily entered into and you are free to resign at any time. Similarly, MAWIB is free to terminate the employment relationship with or without reason at any time so long as there is no violation of applicable federal or state law.

It is your responsibility to read and become familiar with this information and to follow the policies, procedures, rules and regulations contained herein. MAWIB reserves the right to eliminate, change or deviate from any of the policies, practices, procedures, rules and employee benefits, in whole or in part, at any time with or without notice.

If you have questions regarding employee benefits information, please refer to the Benefits Plan provided to you, and located in the Human Resources Office. The Benefits Plan will always prevail in instances where the policy or policies may disagree.

This Employee Handbook overrides, supersedes and replaces any former or existing Agency policies, manuals and policy statements.

Each staff member contributes something distinctive to our combined efforts in carrying out programs that fulfill our mission. We hope you will find challenging and rewarding ways to contribute to the success of MAWIB.

Sincerely,

Board of Directors





## MISSION STATEMENT

The Milwaukee Area Workforce Investment Board will build a strong workforce development system by planning, coordinating, collaborating and monitoring workforce initiatives with businesses, partners and community stakeholders at the local, regional, and state level to ensure a skilled and productive workforce for the 21<sup>st</sup> century.

## AGENCY PHILOSOPHY AND GOALS

The overall philosophy inherent within our programs is based upon the following concepts: quality services shall be provided within a human service atmosphere that stresses safety, human dignity, unconditional positive regard and a right to fair, consistent and appropriate services.

Our services are predicated upon the belief that a continuum of services can be provided within the community. This emphasizes providing opportunities for learning along with services that focus upon the personal growth of our participants in their becoming self-sufficient.

The ultimate goal is to prepare and provide participants of our services with the necessary skills to function at their maximum level of independence.

## 2. EQUAL EMPLOYMENT / DISCRIMINATION-FREE WORKPLACE

### EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

MAWIB complies with the equal opportunity policy and standards of the Wisconsin Department of Workforce Development (DWD) and all other applicable Federal, State and local rules and regulations regarding non-discrimination in employment. Further, MAWIB is committed to ensuring non-discrimination and equal treatment of all employees, applicants, volunteers, interns, participants, or members on its committees and Board of Directors.

Accordingly, it is the official policy of MAWIB that no otherwise qualified person shall be excluded from employment, be denied the benefits of employment or otherwise be subjected to discrimination in any manner on the basis of age, race, religion, color, sex, national origin or ancestry, disability, arrest or conviction record,

sexual orientation, military/ veteran status or military participation, marital status, or any other legally protected characteristic.

Any questions or concerns should be referred to your Manager/Supervisor or Human Resources. If you have a problem or concern regarding any matter relating to equal employment opportunity, you should discuss it with your Manager/Supervisor, or the Human Resources Department.

### AFFIRMATIVE ACTION POLICY

MAWIB believes in and practices equal employment opportunity and affirmative action. It is the policy of MAWIB to employ and advance in employment for qualified individuals without discrimination against any employee or applicant for employment because of race, color, religion, sex, physical or mental disability, national original, age or status as a special disabled veteran, veteran of Vietnam era, or other protected veteran. To effectuate the commitment to this policy, MAWIB has an established Affirmative Action Plan whereby it undertakes that:

1. MAWIB will recruit, hire, train and promote qualified persons and ensure that all other personnel actions are administered without regard to race, color, religion, sex, national origin, disability, or status as a special disabled veteran, Vietnam era veteran, or other protected veteran.
2. MAWIB will ensure that all employment decisions are based on valid job requirements.
3. MAWIB will ensure that promotion decisions are in accordance with principles of equal employment opportunity.
4. MAWIB will ensure that all personnel actions such as compensation, benefits, transfers, layoffs, return from layoff, MAWIB-sponsored training, education, tuition assistance, social and recreational programs, will be administered without regard to race, color, religion, sex, physical or mental disability, national original, age, sexual orientation or status as a special disabled veteran, veteran of Vietnam era, or other protected veteran.

The Legal Affairs Coordinator serves as the Agency's Affirmative Action Officer and has overall responsibility for assuring compliance with this policy. All employees are responsible for supporting the concept of equal opportunity and affirmative action and assisting in meeting its goal.



MAWIB maintains affirmative action plans for minorities, women, disabled persons and veterans. Any questions regarding these plans or the Agency's equal employment opportunity policy should be directed to the Affirmative Action Officer. If you wish to view these plans, contact the Affirmative Action Officer during normal working hours.

## WORKPLACE HARASSMENT

In keeping with this commitment of equal employment opportunity policy and affirmative action plans, MAWIB will not tolerate harassment of employees by anyone including any Manager/Supervisor, co-worker, participant, vendor and/or guest.

It is the policy of MAWIB that it will not discriminate against any employee, applicant for employment, student, participant, or membership on MAWIB committees or the Board on the basis of race, disability, sex, sexual orientation, creed, religion, national origin, ancestry, marital status, arrest or conviction record, membership in any type of military force of the United States or Wisconsin, or other legally protected status, as required by federal, state and local legislation, as well as other applicable government regulations and executive orders.

All officials and employees of MAWIB will be informed at the time of hire and on an annual basis of this policy. This policy will affect all employment and delivery of services that will be made to further the principle of equal opportunity.

MAWIB is committed to providing services and a work environment by which employees, applicants for employment, students or participants are treated with courtesy, respect and dignity. As part of this commitment, MAWIB will not tolerate any form of harassment, verbal, non-verbal or physical, with regard to an individual's race, sex, religion or national origin or any other state or federally protected characteristics.

## HARASSMENT DEFINED

Workplace harassment is defined as any unwanted, unwelcome, deliberate, or repeated conduct that creates an intimidating, offensive, abusive or hostile work environment that is based upon race, sex, religion, color, national origin, disability, age, sexual orientation or any other characteristic protected by law.

Intimidation and workplace harassment can arise from a broad range of physical, verbal or non-verbal behavior by employees. This policy against workplace

harassment applies throughout our Agency, whether in the office, work assignments outside the office, office-sponsored social functions, or via electronic communication.

Forms of harassment and intimidation can include, but not limited to, the following:

1. Physical assaults or mental abuse;
2. Racial, ethnic or religious insults or slurs;
3. Unwelcome sexual advances, touching or physical contact;
4. Sexual comments, jokes, stories or innuendoes; and
5. Display of sexually explicit or otherwise offensive posters, calendars or materials.

Consistent with this policy, an employee's conduct, whether intentional or unintentional, that results in the harassment of other employees because of their race, sex, religion, color, national origin, disability, age, or sexual orientation is illegal and will not be tolerated.

Anyone who engages in such harassment or retaliates against another employee because they report harassment, or participate in an investigation of a claim of harassment, will be subject to immediate corrective action up to and including termination. It is the responsibility of management and all staff to ensure that these activities do not occur.

### COMPLAINT PROCEDURE

All complaints of harassment will be treated seriously. If you believe that you are or have been the subject of harassment or retaliation by any person including, but not limited to, co-worker, Manager/Supervisor, participant, vendor, or guest of the Agency, or have witnessed such harassment or threats, you must report the matter in writing to your immediate Manager/Supervisor and/or to Human Resources. Any such reports will be investigated promptly, thoroughly and fairly; and be kept confidential within the bounds of an investigation and to the extent possible.

If an investigation confirms that harassment has occurred, MAWIB will take corrective action including discipline up to and including immediate termination of employment. However, filing groundless and malicious complaints is an abuse of this policy, is prohibited and may result in discipline up to and including termination of employment.



### 3. HOURS OF WORK

The normal operating business hours as established by the Chief Executive Officer are Monday to Friday, 8:00 a.m. - 5:00 p.m.

MAWIB has the discretion to set the work hours and schedule for employees. Accordingly, the workweek is Monday - Friday for most staff, but may vary according to the position and may include weekends or evenings as necessary. It is essential and a condition of employment that all employees arrive promptly for work. Employees are expected to report to work at their expected time, unless written authorization for flexible scheduling has been authorized and approved by their Manager/Supervisor. A copy of the written authorization must be submitted to Human Resources.

Any work outside of the employee's defined workweek must be pre-approved by the employee's Manager/Supervisor. If any employee has to work after normal operating business hours, it must be pre-approved by the Manager/Supervisor. The employee must then notify the Security Guard and the Manager of Office & Facilities.

Any pre-approved work-related activities, including attendance at meetings and preparation required to perform their job, will be considered part of the normal workweek. Paid attendance at conferences, workshops or classes must be pre-approved by their Manager/Supervisor. Special schedules may be required to accommodate program needs. Your Manager/Supervisor will notify you as early as possible regarding scheduling needs.

#### OVERTIME

By law, all hourly, non-exempt employees shall be compensated time and one-half for all "*hours worked*" in excess of forty (40) hours worked in one week. All overtime must be directed and approved in advance by the Department Manager/Supervisor or Director. Accurate documentation of time worked is the responsibility of the employee. A week is defined as Sunday through Saturday.

There may be times when it will be necessary for you to work overtime. Your Manager/Supervisor will notify you as early as possible regarding scheduling needs.



Accordingly, overtime for hourly staff can be required with 24 hour notice and directed by your immediate Manager/Supervisor. Refusal to work mandated overtime, except for extenuating circumstances as determined by management, may result in disciplinary action. Staff who volunteer for overtime and fail to honor this commitment may be disciplined.

## BREAKS

Employees will be provided one 15-minute paid break in the morning and one 15-minute paid break in the afternoon as business and operations allow it.

## LUNCH PERIODS

There is no formal lunch period scheduled for employees. Each employee is allowed a one hour unpaid lunch period that should be taken between the hours of 11:00 a.m. - 2:00 p.m. with any routine variation having to be approved by the Manager/Supervisor. Employees may be required to record their in and out time. Employees may not perform any work while on their unpaid lunch hour.

## FLEXIBLE SCHEDULING

MAWIB may allow a flexible work schedule between 7:00 a.m. to 6:00 p.m., Monday-Friday, for employees under the following guidelines:

- The revised schedule must not interfere with the employee in performing his/her job responsibilities;
- The request for flexible scheduling must be in writing and approved by their Manager/Supervisor;
- It must state the hours of the revised schedule, duration of schedule and justification for the request;
- Flexible schedules may include special monitoring provisions; and
- All approved schedules will be filed in the employee's personnel file.

Previously approved flexible schedules may be revised at any time in writing by MAWIB. Anyone working outside of 8:00 a.m. to 5:00 p.m. should have a 'flex schedule' on file. A five (5) day transitional period will be provided when possible for this schedule change. Request forms may be obtained from Human Resources.

## OFFICE CLOSING / SEVERE WEATHER



MAWIB may close during periods of inclement weather or other emergency situations. The decision to close the Agency will be made by the Chief Executive Officer, no later than 6:30 in the morning when possible.

Employees should check if MAWIB's locations will not be open by calling MAWIB's main phone number - 414-270-1700 - for information on the day's schedule. In addition, Manager/Supervisors and Directors will communicate to their staff information about closings or a late opening of MAWIB office(s). MAWIB will also provide this information to Channel 4 and Channel 12.

If the Agency is closed for inclement weather at the beginning of the day, staff will be paid regular pay for their normal scheduled work hours.

If the Agency closes during the day, any staff who has already reported for work will be released and paid regular pay, up to their normal scheduled work hours. If the Agency is not closed, but an employee chooses to remain at home, vacation, paid benefit hours or time without pay must be used.

Due to business necessity, some employees may be required by the Chief Executive Officer to come into their office even though the office is closed.

Instructions related to early dismissal will be issued on an event-by-event basis. This notice will be sent via E-mail to all employees. This information will be sent and/or authorized by the CEO or a Director.

## 4. EMPLOYMENT

### CATEGORIES OF EMPLOYMENT

MAWIB has the following different categories of employees in order to meet staffing requirements:

- FULL-TIME

Work 30-40 hours per week and are eligible for the complete benefit package.

- PART-TIME

Work 20-29 hours per week and are eligible for some benefits.



- INTERIM / LIMITED TERM EMPLOYMENT (LTE)

Individuals who are hired on a temporary basis to perform a specific job function, for a specified period of time less than six months, are eligible for some benefits.

- INTERNS - COLLEGE

Students hired on a temporary basis are eligible for some benefits.

All personnel are governed by one of these categories. A change in employment category can affect employee benefits. Any change must be approved by the CEO.

## INTERNAL JOB OPPORTUNITY POSTINGS - PROCESS

In accordance with the organizational policies and procedures of MAWIB, the Chief Executive Officer is the hiring authority, as designated by the Board of Directors. The hiring authority may be delegated by the Chief Executive Officer to others, including Directors.

Full-time positions are posted internally for a minimum of 5 working days. Each time an employee wishes to be considered for a new position, he/she must go through the selection process that has been established for the position.

MAWIB reserves the option to waive the internal posting and pursue internal and external candidates simultaneously.

The appointment to a position is not official until a written notification from Human Resources is signed by the Chief Executive Officer and delivered to the candidate. Any position may be appointed by the Chief Executive Officer as necessary to meet agency needs and program obligations.

## PAYROLL PROCEDURES

MAWIB pays employees every two (2) weeks on Friday through direct deposit into his/her checking and/or savings account(s). MAWIB complies with all state and federal regulations for proper payment of its employees. Any employee, who believes that an error was made on his/her paycheck, must notify Payroll within 15 days of the pay period in which the error was allegedly made. If it is determined that an adjustment is necessary, the adjustment will normally be made on the next paycheck. Further, MAWIB will take actions to remedy any processes necessary to ensure future errors will not occur.





All employees are required to complete a biweekly time sheet in the timesheet system (module) and submit it to their Manager/Supervisor by 12:00 PM on the Friday that ends the pay period.

Any employee hired in the middle of a pay period will be paid on the next pay date for the number of hours worked during that covered pay period. Wage increases will be implemented and paid in a manner consistent with the accounting practices of MAWIB.

Employees should retain all payroll stubs for their records. These stubs provide information on a biweekly basis. Following the end of a calendar year, each employee will receive a statement of earnings (W-2) form.

Income tax laws require that Federal income tax, State income tax and Social Security on wages be withheld. In addition to the required tax deduction, certain premiums and contributions that have been authorized by the employee such as United Way, United Performing Arts Fund, 401(k) and insurance premiums will be deducted.

## PERSONNEL RECORDS

It is important that personnel records contain accurate, up-to-date information. For that reason, each employee should notify their Manager/Supervisor of any change in status, i.e. telephone number, mailing address, number of dependents, beneficiary designations, change in immigration status and who to notify in case of an emergency. Employees are also encouraged to provide supplemental information relating to education and professional development.

## RIGHT TO PRIVACY

Employees' personnel records are confidential. No unauthorized information concerning their salary history or performance is released without their written consent. All telephone requests for verification of employment will be limited to a confirmation of dates of employment and position(s) held.



## 5. EMPLOYEE PERFORMANCE

### ORIENTATION, TRAINING AND REVIEW PERIOD

MAWIB provides a review period of 90 days for new employees. The employee's ability to learn how to do their job, overall reliability, integrity and commitment to their work and to MAWIB will be monitored.

The Manager/Supervisor will provide the employee with the orientation, training and instruction appropriate to their work assignments. In addition, he/she will monitor the employee's work and make suggestions for improvement. After 90 days of orientation and training, the employee should meet with their Manager/Supervisor for an initial performance review. The review period may be extended at the sole discretion of management.

Employees will not be eligible for promotions or transfers during the initial six month period. This requirement may be waived in the best interests of the Agency and with final approval by the CEO.

### PERFORMANCE EVALUATIONS

Performance evaluations are intended to measure work performance against specific criteria and help the employee reflect upon their work performance and grow professionally. A new employee or promoted employee will receive a written performance appraisal at or after 90 days of employment.

The reviews should provide the opportunity for an employee and their Manager/Supervisor to review strengths and areas that need to be improved. Manager/Supervisors will use job descriptions and performance objectives as a guide in evaluating work.

Thereafter, employees generally receive a review by each anniversary date. Copies of evaluations will be shared with the employee, and the employee will have an opportunity to respond to them and discuss them with their Manager/Supervisor. Supplemental written performance reviews may be conducted at any time in order to address either satisfactory or unsatisfactory job performance.

Performance reviews will be written and employees will participate in the review process. A conference will be held between the employee and their Manager/



Supervisor to discuss the employee's performance and other aspects of the job duties and responsibilities including professional development goals and needs.

If there are areas requiring improvement, the Manager/Supervisor and employee will develop a written set of goals and methods to assist the employee with achieving improved performance within a defined time frame.

Employees will be asked to sign the performance evaluation and may include a written statement to their Manager/Supervisor and give a copy to Human Resources for any portion of their review. The statement and the performance evaluation will be included in the employee's personnel file.

All employees may be considered for a wage increase once a year at the time of his/her evaluation. Wage increases are at the sole discretion of the Board of Directors and management. There is no guarantee that wage increases will be made every year or that every employee will receive a wage increase. Wage increases will be based upon available funding, the employee's written performance evaluation, attendance record, and any other relevant factors, as determined by management.

MAWIB evaluates performance and reviews salary on the basis of the employee's contribution during the immediate review period. Seniority does not entitle an employee to a wage increase. In addition, it is possible that an employee may reach the maximum possible salary for his/her position, and in such a situation will receive no merit increases, but will still be eligible for any cost of living increases as applicable.

## 6. SEPARATION OF EMPLOYMENT

### REDUCTION IN FORCE (RIF) - LAYOFF, RECALL AND REINSTATEMENT

MAWIB's budget is dependent on government grants and private donations. Therefore, a Reduction in Force (RIF) may occur because of changes in funding or program changes. Any employee who is faced with a layoff will receive a written notice from his/her Manager/Supervisor at least two weeks prior to the effective date. If the laid-off employee is recalled within one year immediately following the date of the layoff, the employee is considered a reinstated employee and retains credited service for the period of time of the lay-off. If the duration of the lay-off is in excess of one year, the employee's employment is considered terminated; re-employment will be on the same basis as a new hire.



Employees who have been employed more than one year may be given a minimum of a 30 day advance notice. The employer retains the option of pay in lieu of any advance notice.

Employees separated due to a reduction in force shall be eligible for awarded unused vacation benefits.

## INVOLUNTARY, VOLUNTARY TERMINATION OR RESIGNATION

All employees are employed AT-WILL and employment can be terminated with or without cause.

Employees who resign their employment should provide the Agency a two (2) week written notice to their respective Manager/Supervisor. The final termination date will be the last day the employee worked.

An employee who is a no call/no show absence for a period of three (3) consecutive days is considered to have voluntarily terminated/resigned their employment.

Whenever employment is terminated, either voluntarily or involuntarily, Human Resources will attempt to conduct an exit interview.

- **BENEFITS OF SEPARATED EMPLOYEES**

In that event, or in the event an employee is terminated:

1. Sick or Personal hours not already scheduled may not be taken during the notice period except with approval of the CEO or a Director. There is no compensation for unused personal days, sick days or holidays.
2. The group medical/dental insurance plan will continue until the last day of the month following the last day worked. Life and Disability will stop at the date of termination.
3. The medical and dental component of the group insurance plan may, at the option of the employee, be continued as provided by applicable Federal and State laws upon proper enrollment. The forms will be mailed by the COBRA administrator. Timely premium payment for this extended coverage is the sole responsibility of the individual.



**MEDICAL COVERAGE CONTINUATION (COBRA)**

In the event of a death, termination of employment (including retirement), certain reductions of hours or entitlement to Medicare benefits, participants and their eligible dependents will be contacted by the Benefits Manager and offered the opportunity to continue medical coverage.

If you become divorced or legally separated or have a child who no longer qualifies as a dependent under the plan, you must notify the Benefits Manager within 60 days of the event to receive applicable continuation rights paperwork.

You or your dependents will be entitled to continue medical coverage through the Agency by paying the full monthly premium for the coverage. The maximum time allowed for continuation coverage is 18 months in the event of termination or a reduction in work hours and 36 months for most other events, with the exception of the flexible spending account which will run only run through the remainder of the plan year. Failure to make timely payment of your premiums will result in the forfeiture of continuation benefits.

At the end of the COBRA period, certain areas of coverage may be converted to an individual policy through the plan carrier at the rates then in effect, subject to the terms of the plan.

This benefit is provided in accordance with the requirements of the federal law on continuation of health insurance (commonly known as “COBRA”). This benefit is subject to change as necessary to comply with federal or state law.

**7. EMPLOYEE BENEFITS PROGRAM**

MAWIB provides a substantial Benefits Program designed to offer employees security from financial loss due to medical costs and to provide benefits for retirement through a 401(k) plan. In addition, employees receive paid leave for vacation, illness, and personal time.

At the time of hire, eligibility for benefits will be included in the Offer of Employment letter. While the current plan description will prevail, the following summary is an overview of the benefits program. MAWIB retains the right to terminate or change benefits at any time.

Some employee benefits may require employee participation in the cost of premium sharing/contributions. These premiums and contributions for 401(k) are deducted directly from the employee's paycheck.

### RETIREMENT PLAN

MAWIB sponsors a 401(k) profit sharing plan for all eligible employees.

On June 30<sup>th</sup> of each year, MAWIB will contribute a percentage of the eligible employee's fiscal year (July 1 - June 30) compensation to the plan trust. The employer contribution percentage is comprised of 3% as a safe harbor contribution and a discretionary percentage determined by the Board of MAWIB on an annual basis for a profit sharing contribution.

For more details concerning the retirement plan, refer to the plan summary document available from Human Resources.

### EMPLOYEE ASSISTANCE PROGRAM (EAP)

MAWIB recognizes that family, marital, alcohol, drug, financial, and other types of personal problems can affect an employee's job performance. These problems can often be successfully improved through professional assistance and treatment.

Using this benefit will not have a negative effect on an employee's current job or promotional opportunities. Further, this in no way relieves an employee from the obligation of performing the job duties at the expected level or from meeting other requirements of MAWIB.

For a brochure listing all the services provided by EAP, see the Human Resources department.

### FAMILY AND MEDICAL LEAVE ACT (FMLA)

It is the policy of MAWIB to comply with the requirements of the Wisconsin and Federal Family and Medical Leave Acts (FMLA) and the policy will be administered accordingly.

FMLA leave may be paid, unpaid or a combination of paid and unpaid, depending on the reason for the leave and the benefits to which the employee may be eligible.



The state and federal laws differ in a number of areas, and the Agency will comply with both. When the reason for a leave qualifies under both state and federal law, the following rules apply:

- The employee is deemed to be exhausting his/her entitlement under both laws concurrently; and
- The provision(s) most generous to the employee will apply.

The taking of leave under this policy will not be used against an employee in any employment decision, including the determination of promotions, discipline, compensation, et cetera.

- **ELIGIBILITY**

To be eligible for leave under this policy, an employee must have been employed by the Agency for at least 12 months (52 consecutive weeks for Wisconsin leave). In addition, in the 12 months immediately preceding the commencement of the leave, the employee must have:

- been compensated for at least 1,000 hours to qualify under Wisconsin law; and
- worked at least 1,250 hours to qualify under federal law.

MAWIB will inform employees requesting leave whether they meet the basic eligibility requirements for state and federal FMLA leave. At the same time, the Agency will inform the employee of any additional information required to verify that the need for leave is for a FMLA-qualifying reason and employee's rights and responsibilities while taking FMLA leave.

- **AMOUNT OF LEAVE AVAILABLE**

Unless otherwise stated, under federal law, an eligible employee is generally qualified for up to a total of 12 weeks of protected leave within a 12-month period on a rolling-forward basis for any combination of reasons listed below.

It is possible that an employee could qualify for leave only on the basis of hours worked under the Wisconsin law, which generally covers shorter periods of time than the 12 weeks provided by federal law. These situations will be discussed on a case-by-case basis with affected employees and are referenced below.



- TYPES OF LEAVE COVERED

- A. Birth or Placement for Adoption or Foster Care

Family leave will be available to eligible male and female employees for the birth of a child or for placement of a child with the employee for purposes of adoption or foster care. Such leave must generally be completed within 12 months of the birth or placement.

Wisconsin law allows up to 6 weeks of family leave in a calendar year for this purpose and such leave must be commenced within 16 weeks of the birth or placement.

- B. Serious Health Condition of Employee

An eligible employee, who experiences a serious health condition, may take medical leave under this policy. A serious health condition is an illness, injury, impairment, or physical or mental condition that generally occurs when the employee:

- Receives overnight inpatient care in a hospital, hospice or nursing home;
- Suffers a period of incapacity of more than three consecutive full calendar days accompanied by at least 2 visits to a health care provider or one visit and a regimen of continuing treatment;
- Is pregnant, including severe morning sickness;
- Has a history of a chronic condition that may cause episodes of incapacity; or
- Has a permanent or long-term condition which requires continuing treatment by a health care provider.

Wisconsin law permits an employee to take up to 2 weeks of medical leave in a calendar year to care for his/her own serious health condition.

Medical leave may be taken all at once or, when medically necessary, in smaller increments. The need for leave must be documented by the employee's treating health-care provider through the medical certification process.

An employee may be paid for all or part of a medical leave to the extent s/he is eligible for benefits such as short-term disability.



A fitness-for-duty statement will be required in order for an employee to return from a medical leave. Failure to provide the statement will result in a delay in the return to work.

#### C. Serious Health Condition of Immediate Family Member

An eligible employee may take family leave under this policy in order to care for a son, daughter, spouse or parent with a serious health condition (see above section for general definition of a serious health condition). This leave may be taken all at once or, when medically necessary, in smaller increments. It will be necessary for the family member's treating health-care provider to document the need for leave through the medical certification process.

Wisconsin law allows up to 2 weeks of family leave in a calendar year to care for a child, spouse, domestic partner, parent, or parent-in-law (including a domestic partner's parent) with a serious health condition.

#### D. Qualifying Exigency for Military Family Leave

Federal law provides that an eligible employee may take family leave under this policy to address a qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent (the "military member") is on covered active duty deployment or call to active duty deployment to a foreign country.

Qualifying exigencies include attending certain military events, arranging for alternative childcare, parental care under certain circumstances, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings. This leave may be taken all at once or, in smaller increments. It will be necessary to submit a complete and sufficient certification for FMLA leave due to a qualifying exigency. The federal FMLA does not provide for a full 12 weeks of leave for all types of qualifying exigencies.

#### E. Leave to Care for a Covered Service Member with a Serious Injury or Illness

An eligible employee may take up to 26 weeks of family leave in a single 12-month period under this policy to care for the employee's spouse, child, parent or next of kin who is a covered service member that incurs or aggravates a serious illness or injury while in the line of duty on active duty. A covered service member is a service member who incurs (or aggravates) an illness or injury in the line of duty, on active duty, or existed before beginning of the member's active duty and were aggravated by service in the line of duty on active duty that renders the service member medically unfit to perform duties of

his or her office, grade, rank or rating. A covered service member is (1) a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness, is otherwise in outpatient status, or is otherwise on the temporary disability retired list for a serious injury or illness, or (2) a veteran who was discharged or released under conditions other than dishonorable at any time during the 5 year period prior to the first date the eligible employee takes FMLA leave to care for the covered veteran who undergoes medical treatment, recuperation, or therapy for a serious injury or illness. This entitlement will be applied on a per-covered-service member, per-injury basis. It will be necessary for the covered service member's treating health-care provider, as defined by law, to document the need for leave through the medical certification process. In certain instances, this leave may be combined with all other FMLA leaves, limiting the employee's FMLA leave entitlement for all purposes to no more than a total of 26 weeks of leave during the single 12-month period.

- NOTIFYING THE AGENCY OF THE NEED FOR FAMILY OR MEDICAL LEAVE

Generally, an application for leave must be completed for all leave taken under this policy. When the need for leave is foreseeable, the employee should provide notice at least 30 days in advance. When this is not possible, notice should be provided as soon as the employee learns of the need for leave. In cases of emergency, verbal notice should be given as soon as possible (by the employee's representative if the employee is incapacitated), and the application form should be completed as soon as practicable. Notice of leave for a qualifying exigency must be provided as soon as practicable, regardless of how far in advance such leave is foreseeable.

Calling in "sick" does not qualify as FMLA leave. An employee must provide sufficient information regarding the reason for an absence for the Agency to know that protection may exist under this policy. Sufficient information may include that, because of a serious health condition, the employee is unable to perform job functions, a family member is unable to perform daily activities, or the employee or family member require hospitalization or continuing treatment. Sufficient information may also include circumstances supporting the need for military family leave. In addition, if the employee is seeking leave for an FMLA-qualifying reason for which the Agency has previously provided the employee with FMLA-protected leave, the employee must specifically refer to the qualifying reason for leave or the need for FMLA leave which has been previously taken or certified.



Failure to provide any of this information as requested may result in the delay or denial of FMLA approved leave.

In addition, if the employee is capable of complying with the Agency's normal call-in and reporting procedures, or arranging for the Agency to receive timely notice of the employee's absence, and fails to do so, the Agency may deny or delay the FMLA leave.

Failure to provide adequate notice may, in the case of foreseeable leave; result in a delay of the leave. This means the absence may then be counted against the employee for purposes of discipline for attendance, et cetera.

Leave application forms are provided by Human Resources.

- **MEDICAL CERTIFICATION OF A SERIOUS HEALTH CONDITION/SERIOUS ILLNESS OR INJURY**

Generally, the Agency will require medical certification to verify that an employee or family member's illness meets the definition of serious health condition (or serious illness or injury) and to determine the nature and duration of the leave. In the case of a family illness, the provider must also verify that the employee is needed to care for the family member.

The appropriate form should be obtained from Human Resources and should generally be returned within 15 days. If the employee cannot comply with this deadline, the employee must contact Human Resources prior to the expiration of the deadline and request an extension. Failure to provide this certification and/or request an extension may result in delay or denial of the leave.

- **CERTIFICATION OF A QUALIFYING EXIGENCY**

Generally, the Agency will require certification to verify that an employee's request for qualifying exigency leave is appropriate. In addition to the certification form, the employee may need to provide information about the employee's orders to military service.

The appropriate form should be obtained from Human Resources and should generally be returned within 15 days. If the employee cannot comply with this deadline, the employee must contact Human Resources prior to the expiration of the deadline and request an extension. Failure to provide this certification and/or request an extension may result in delay or denial of the leave.



- **ADDITIONAL CERTIFICATIONS**

If the Agency has reason to question the validity of a medical certification, an employee may be required to provide a second certification from a health-care provider selected and paid for by the Agency. If the second opinion differs from the first, a third opinion may be required. The health-care provider for the third opinion must be mutually chosen by the employee and the Agency and paid by the Agency. The third opinion, by law, is binding on all parties.

Periodic recertification and annual certifications to verify that a condition is ongoing may be required as provided by law. Failure to provide this certification and/or request an extension may result in delay or denial of the leave.

- **DESIGNATION OF FMLA LEAVE**

The Agency will provide employees a Designation Notice informing employees whether the leave will be designated as FMLA-protected and, if so, the amount of leave counted against the employee's leave entitlement.

- **USE OF PAID AND UNPAID LEAVE**

Under Wisconsin's FMLA, an employee entitled to family or medical leave may substitute (use), for any leave requested under the Act, any other paid or unpaid leave which has accrued to the employee. The Agency will not require substitution when an employee is taking leave under Wisconsin's FMLA.

Under federal law, the employee may elect or the Agency may require that the employee substitute accrued vacation, sick, or other Agency-provided paid leave during periods of federal FMLA leave. However, the Agency may prohibit the substitution of any accrued paid leave where the employee does not otherwise meet the conditions for use of such leave. Please consult the Agency's applicable policies for more information on the requirements for conditions of use.

When paid benefits are substituted for the otherwise unpaid time, the employee is using the benefits concurrently with FMLA leave and those benefits will not be available to the employee later. Similarly, substitution or use of paid leave does not extend the amount of FMLA leave available to an employee, it provides for pay.

As appropriate, employees on medical leave (for the employee's own serious health condition) may simultaneously be eligible for and receive disability or workers' compensation benefits. In such cases, disability and workers'



compensation leave of absences will run concurrently with this family and medical leave.

In cases where substitution of a paid benefit is not possible, the employee will receive reduced compensation consistent with the number of hours the person actually works.

- **INTERMITTENT OR REDUCED SCHEDULE LEAVE**

Intermittent and/or reduced schedule leave will be permitted when it is medically necessary, for qualifying exigencies, and, in some cases, for birth or placement for adoption. In all cases, the total amount of leave taken in a calendar year should not exceed the 12 weeks defined earlier in this policy.

Intermittent and reduced schedule leave must be scheduled with minimal disruption to the Agency's operation. To the extent an employee has control, medical appointments and treatments related to a serious health condition should be scheduled outside of working hours or at such times that allow for a minimal amount of time away from work.

The Agency may, in some cases, transfer an employee to an alternative position, with equivalent pay and benefits, in order to better accommodate the need for intermittent or reduced schedule leave.

- **BENEFIT CONTINUATION DURING LEAVE**

Employees may elect to continue group health insurance while on leave but must continue to pay their portion of the premium. Other employment benefits, such as group life insurance, AD&D, etc., will also be continued during the leave, as long as the employee continues to pay any required contribution. If the employee has pay substituted for otherwise unpaid FMLA leave or has appropriate pay available, the employee contribution towards the premium will be deducted as part of a normal payroll deduction to the extent permitted by law. Payment arrangements will be discussed with individuals upon their request for leave. If an employee who is required to make a contribution for health benefits does not make it within 30 days of the payment's due date, the employee's health benefits will cease.

- **RIGHTS UPON RETURN FROM LEAVE**

An employee who takes leave under this policy will be reinstated to the same job or an equivalent position upon completion of the leave. If an individual has

exhausted all leave under this policy and is still unable to return to work, the situation will be reviewed on a case-by-case basis to determine what rights and protections might exist under other Agency policies.

The law provides that an employee has no greater rights upon a return from leave than the individual would have had if s/he had continued to work. Therefore, an employee may be affected by a layoff or other job change if the action would have occurred had the employee remained actively at work. In such cases, the official date of the layoff will mean the end of FMLA leave for the employee. If the employee is recalled, if FMLA leave is still required, it may then continue.

- EARLY RETURN FROM LEAVE

An employee who wishes to return to work earlier than originally anticipated should provide at least two days' notice of such request. A fitness-for-duty certification may be required.

- MISCELLANEOUS

The Wage and Hour Division of the U.S. Department of Labor is the federal agency that regulates the federal FMLA. Federal law makes it unlawful for an employer to interfere with, restrain, or deny the exercise of any right provided under the FMLA; or to discharge or discriminate against any person for opposing any practice made unlawful by the FMLA or for the involvement in any proceeding under or related to the FMLA. Nothing in the FMLA affects any federal or state law prohibiting discrimination, or supersedes any state or local law or collective bargaining agreement which provides greater family and medical leave rights. Employees have the right to file a complaint with the U.S. Department of Labor ("DOL") or bring a private lawsuit if they feel the Agency has violated their rights under the FMLA. For more information, you may contact the DOL at 866-487-9243 or [www.wagehour.dol.gov](http://www.wagehour.dol.gov). That being said, it is the preference of the Agency that its employees first bring any concerns to the attention of Human Resources.

This policy provides an introduction to the rights provision of the Family and Medical Leave laws. Questions employees may have about this law should be directed to Human Resources.



## FLEXIBLE SPENDING PLAN

The flexible spending plan allows full-time and part-time employees to pay for medical, dependent care or private insurance expenses with pre-tax money. They are able to contribute money into an account and be reimbursed for out-of-pocket medical, dental, vision, dependent care and private insurance expenses at a later time. Employees are eligible the first of the month following 30 days of continuous employment. A copy of the summary plan description will be given to all eligible employees at orientation.

## GROUP LONG TERM DISABILITY AND LIFE INSURANCE

Group long term disability and life insurance coverage are available to full time employees, who are regularly scheduled to work at least 30 hours each week. The plan is effective on the first day of the month following 30 days of continuous employment.

## HEALTH AND DENTAL BENEFITS

Group health and dental insurance coverage is available to full time employees, who are regularly scheduled to work at least 30 hours each week. Enrollment into the health and dental plans occurs when an employee is hired and coverage is effective the first day of the month following 30 days of continuous employment. There is an open enrollment period held once a year, which allows employees who did not enter the plan during their enrollment period to reapply or add dependents.

In addition, it is possible that an employee who waives benefits and then desires coverage may be required to provide evidence of insurability and may be denied coverage.

The health and dental plans are employee/employer contribution-type programs. In order to maintain this benefit at the lowest premium percentage, we ask all employees to carefully assess medical needs as well as the charges.

During a leave of absence, the employee will be responsible for continuing the regular bi-weekly payments for health insurance by direct pay to the Agency. Depending upon the type of leave, the employee may be required to make the full premium payment.

After termination, or any change in status, which results in the end of coverage, please refer to the section on COBRA.



Copies of the health plan and benefit coverage are given to all eligible employees. Any questions can be directed to Human Resources.

## JURY DUTY

MAWIB encourages employees to participate in this civic obligation. An employee must submit written evidence of his/her payment amount for jury duty and the period he/she was required to serve. Employees must report to work when they are not required for actual jury duty. Full-time employees will receive their regular compensation for the period they are on jury duty minus the amount they were paid for jury duty. Paid jury leave will be limited to a period of one month.

## MILITARY LEAVE

MAWIB recognizes the patriotic service rendered by employees who belong to military reserve units and the Civil Air Patrol.

An unpaid military leave of absence will be granted if an employee enlists, is inducted or is recalled to active duty in the Armed Forces of the United States, for a period of up to five (5) years. Employees who perform in and return from military service in the Armed Forces, the Military Reserves or the National Guard will retain their rights with respect to reinstatement and length of service, as required under the Uniformed Services Employment and Reemployment Rights Act (USERRA). Employees will also be eligible to continue health and dental benefits under certain conditions.

Appropriate paid leave may be provided for reservists and members of the National Guard to participate in annual encampment or active duty training, emergency service or specialized training if all legal requirements are met. If these activities are compensated by the federal government, the Agency will pay the difference between the employee's regular straight-time wages and the government's compensation, up to a maximum of two (2) weeks per year. Employees who are not employed on a full-time basis will receive appropriate unpaid time off.

In addition, MAWIB complies with all applicable provisions of the various laws concerning the re-employment of employees that enter the military service through enlistment or selective service. In these situations, the employee must, upon enlisting, request a leave of absence.





During an approved leave of absence, MAWIB will continue normal coverage for health, dental and life insurance for up to (6) six weeks. No accrual of sick leave or vacation time will occur during the leave of absence.

#### CIVIL AIR PATROL LEAVE - WISCONSIN

An unpaid leave of absence will be granted to an employee who is a member of the Civil Air Patrol for purposes of participating in a Civil Air Patrol emergency service operation, so long as the leave of absence does not unduly disrupt the Agency's operations.

In advance of any emergency service operation, the employee must notify the Agency in writing that he or she is a member of the Civil Air Patrol and, at the time of the operation, may be required to provide a written statement from his or her commander certifying the employee's participation in an emergency service operation.

An employee may take up to five consecutive workdays of leave, or up to 15 days of leave in a year, to participate in an emergency service operation. The employee's status with regard to benefits, pay and seniority is considered to be uninterrupted by the leave.

#### PAID TIME OFF

Employee eligibility for paid time off is based on the employment category in which the employee was hired. The employment category and eligibility for benefits is indicated in the written Offer of Employment, and is given to each employee prior to his/her start date.

#### ADVANCING PAID LEAVE

Borrowing or the advance payment of sick leave, personal time, vacation, or other paid time off is not allowed.

#### BEREAVEMENT LEAVE

Employees may take up to five (5) days of paid leave for the death of their spouse or child (the term child includes stepchild or foster child). Three (3) days of paid leave may be taken in the event of death of a parent, grand-parent, grand-child, sister or brother, sister- or brother-in-law, mother- or father-in-law, son- or daughter-in-law,

and legal guardian. A copy of the obituary must be provided. For part-time employees (not LTEs or Interns), leave will be pro-rated.

### PAID HOLIDAYS

The following paid holidays are recognized:

- New Year's Day
- Martin Luther King Day
- Memorial Day
- Fourth of July
- Labor Day
- Thanksgiving Day and day after
- ½ day Christmas Eve
- Christmas Day

Holiday schedules will be reviewed and established annually. For part-time employees, leave will be pro-rated.

### PERSONAL DAYS

Full-time employees are allowed up to five (5) paid personal days off annually, to be used within the fiscal year (July 1 - June 30). For part-time employees (not LTEs or Interns), leave will be pro-rated. Employees hired after July shall be entitled to a pro-rata number of personal hours (1/12<sup>th</sup> per month) based on their start date.

Personal days may not be carried over into the next fiscal year. A request to use personal days must be approved in advance by the Manager/Supervisor.

### SICK LEAVE

Full time employees will be allowed up to 12 paid sick days per year. Sick Leave:

- Begins accruing after the first full month of employment;
- Is earned as of the end of each month; and
- May be accumulated and carried over from year to year, but may not exceed sixty-five (65) days.

Employees must make provisions to call in each day they are sick except approved leave. When the Manager/Supervisor is not properly notified, the absence will be considered unexcused and subject to the disciplinary policy.



In addition, when three or more consecutive sick days are taken by an employee, the employee is required to provide written evidence of medical treatment by a licensed physician. The only exception is for prolonged illness or injury that has been documented by a physician’s written statement. When sick leave misuse is suspected, a Manager/Supervisor may require a doctor’s certificate for a period less than three (3) days.

In order to maintain proper coverage, the employee must notify their Manager/Supervisor by phone of his/her inability to work due to illness. Such notification must occur as soon as possible, but in any event by 8:00 in the morning.

Sick leave is available for use because of an employee illness, doctor’s exam, or dental care. It also may be used for the illness, doctor’s exam, dental care of an employee’s immediate family (parents, brothers/sisters, spouse, and children) whose illness or disability requires personal care. MAWIB may request written verification of the reason for the sick leave from the attending physician of the family member.

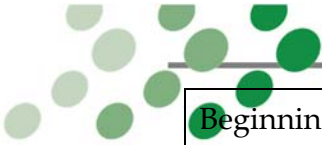
At the end of each fiscal year (June 30<sup>th</sup>), an employee can exchange up to 12 days of unused sick leave for 50% of the cash value of the leave. Employees wishing to do this must complete the appropriate form and return it to Payroll by the due date.

Any employee taking a sick day on a scheduled working day preceding or following a Holiday, Vacation Day or Personal Day may be required to bring in a doctor's excuse to account for the sick day, or forfeit the Holiday, Vacation or Personal pay.

**VACATION**

All full-time employees qualify for vacation accrual following their first full month of employment. A week is defined as an employee’s scheduled hours per week (i.e. scheduled to work 40 hours per week = vacation week of 40 hours). Vacation time is awarded monthly by dividing the hours available in the given year by 12. Balances are available in the timesheet system (module). A report is also available from Payroll. All full-time employees are eligible for the following vacation time based on their length of employment:

<i>Length of Employment</i>	<i>Max Annual Earned and Balance Amount</i>	<i>Additions per Month</i>
Less than 3 years	2 weeks    80 hours	6.67 hours
Beginning of the 4 <sup>th</sup> yr. through the 5 <sup>th</sup> yr.	3 weeks    120 hours	10.00 hours



Beginning of the 6 <sup>th</sup> yr. through the 9 <sup>th</sup> yr.	4 weeks	160 hours	13.33 hours
Beginning of the 10 <sup>th</sup> yr. and thereafter	5 weeks	200 hours	16.67 hours

*\*Values shown represent those accumulated and earned for an employee working a standard 40-hour week. Those scheduled and working less will have pro-rated hours.*

Scheduling of all vacations must be approved by the Manager/Supervisor at least two weeks in advance and is always at the discretion of MAWIB. Failure to obtain written approval from the Manager/Supervisor may be subject to disciplinary action.

Manager/Supervisors and next highest level staff member cannot be off at the same time without prior approval from a Director or CEO.

An employee may carry over up to one year’s equivalent of vacation at all times.

If a part-time employee becomes a full-time employee, his/her anniversary date for paid vacation, sick leave, and health insurance will be the date he/she began full-time employment.

• **YOUTH PROGRAM VACATION / PERSONAL DAYS**

Due to Agency and program needs the spring and summer months are peak periods. By April 1st, the Agency will determine if this policy may be implemented. The following vacation/personal policy will be followed:

1. No more than two (2) vacation or personal days may be taken consecutively during the Spring and Summer time frames. This period will run from May 1st thru August 31st.
2. Staff vacation must be requested in advance. This written request must be submitted two (2) weeks in advance to the Manager/Supervisor of the Youth program. Approval will be based on rotation cycle, confirmation of staff's eligibility for this time and scheduling considerations.

Any exceptions to this policy must be submitted to the Director of Operations and will be decided on a case by case basis. This policy may be used by other programs and departments as needed.

**WORKERS’ COMPENSATION**

Workers’ compensation insurance is provided by MAWIB to cover injuries that occur during the course of employment. Upon sustaining a work-related injury, the employee must *immediately* notify his/her Manager/Supervisor. Notification should

be in writing as soon as possible. In order to process Workers' Compensation claims, the employee must provide the required information on the form obtained from Human Resources.

For minor injuries not requiring professional medical attention, there is a First Aid kit located at the front desk with security. The employee's Manager/Supervisor should be notified of any minor accidents and injuries.

An unsafe condition that might cause injury to other employees or clients should be reported to the Facilities Manager.

Disciplinary action may be taken against an employee who fails to promptly report an injury.

### OVERNIGHT BUSINESS TRIPS

MAWIB has an established policy for overnight-extended duty.

Hourly employees will be paid as hours worked for business related travel time. The Agency will not pay for sleep time of eight (8) hours each night nor for any time that the employee is completely relieved of duty.

If the travel time causes the nonexempt employee to go over 40 hours in the week, overtime must be paid.

MAWIB encourages staff to arrange schedules in such a way so that the trip does not put them over 40 hours in a week. All overtime must be approved by their Manager/Supervisor.

### PERSONAL VEHICLE USE FOR MAWIB BUSINESS

Any person using their personal vehicle for MAWIB business must meet the following criteria:

- Travel must be for an approved MAWIB purpose.
- Possess a valid Wisconsin driver's license.
- Provide a current certificate of insurance with limits of liability of at least \$100,000 / 300,000 / 50,000.

If it is determined that an employee does not have the proper coverage amounts they will have 30 days to get proper coverage, or face disciplinary action. In addition, any mileage will not be reimbursed.

The rate per mile for travel is the allowable reimbursement rate per IRS regulations.

No MAWIB staff member is to provide transportation to any client in the staff's own car.

Abuse and misuse of the mileage reimbursement process will be cause for immediate disciplinary action up to and including termination.

### TRAVEL EXPENSE REIMBURSEMENT

MAWIB reimburses employees for approved work related travel expenses that require the employee to travel. Any expenses incurred by employees while traveling on approved MAWIB business that requires travel outside of Milwaukee County must be noted on a MAWIB travel expense form. These expenses include but are not limited to meals and mileage. Parking costs, occurring both within and outside of Milwaukee County, for approved work related trips will be reimbursed but must be noted on a Travel Expense form.

Reimbursement for expenses outside of Milwaukee County, while on MAWIB business, must be pre-approved. Employees seeking to travel outside Milwaukee County must submit a MAWIB Travel Expense Form based on the *per diem* schedule provided by the Fiscal Department.

Travel costs which exceed the *per diem* schedule are subject to disallowance and must be justified in writing. All travel outside Milwaukee County must be pre-approved by a Manager/Supervisor or Director. Travel occurring outside the State of Wisconsin must be pre-approved by the Division Director and the Chief Executive Officer. *Per Diem* rates will be consistent with established IRS standards.

All expense reimbursement requests processed by the fiscal department must include documentation of the conference, meeting or event that was attended. Requests will not be processed without proper documentation.

If you submit a reimbursement request for traveling expenses not covered by the *per diem* while attending a conference, you must attach a copy of verification that you

attended the conference.

Copies of e-mail confirmation registering yourself for a conference, etc. will be acceptable verification. For conferences where confirmation is not available, you must still provide an official document stating the event, time, and place. This form must be completed with the appropriate verification attached, signed, approved by your Manager/Supervisor, and returned to the Fiscal Department.

#### STAFF DEVELOPMENT

MAWIB encourages staff to maintain and improve skills through participation in continuing education and conference attendance. Employees may attend classes, conferences, institutes and seminars related directly to the work of the Agency and with written approval from their immediate Manager/Supervisor. Approval will depend on the Agency budget, relevance, previous opportunities or other factors.

When attending an approved conference, only the required time spent in workshops or conference events will be counted towards your regular work week hours.

Staff who wish to attend a conference and pay their own expenses may request their time to be paid by the Agency as long as the conference is relevant to Agency purposes and as long as their work week does not exceed their regularly scheduled hours. Prior approval remains with Manager/Supervisor and CEO.

#### EDUCATION AND TUITION REIMBURSEMENT

MAWIB is committed to the educational advancement of its employees. Tuition reimbursement is contingent upon the budget and staff will be notified if tuition reimbursement is not available.

In addition, MAWIB provides tuition reimbursement for only 'one degree' whether the degree pursued is an Associates, Bachelors, Masters, or PhD to full-time employees under the following conditions:

1. The employee has been employed by MAWIB for at least one year as a full-time employee. (A part-time employee or intern that begins working full-time will be eligible for tuition reimbursement one year following the day he/she began working full-time.)

2. The courses or degree must be related to the employee's current position or agency's mission.
3. Reimbursement must be approved by your Manager/Supervisor, Benefits Manager and CEO prior to enrolling in the class. Failure to receive approval prior to the class start date will be subject to denial of the reimbursement request at the discretion of your Manager/Supervisor and the fiscal department.
4. Funds must be available; and attendance must be at an accredited school.

MAWIB will pay tuition reimbursement at a rate of no more than 75% of the cost for one three credit course at the University of Wisconsin – Milwaukee. This is available once a semester with a maximum of three semesters within a fiscal year (July 1 - June 30). A class of more than three (3) credits that falls under the tuition reimbursement maximum will also be considered. Undergraduate and graduate classes will be calculated at the appropriate rates. Tuition reimbursements will be taxable to the employee based on current IRS regulations.

Payment will be made only upon submission of evidence that the employee paid for the class and received a grade of B or better, or an equivalency, as defined by the educational institution. Grade reports must be submitted no later than 45 days after the end of the semester. The start date of a course determines the fiscal year in which it is placed for reimbursement.

## 8. WORKPLACE SAFETY AND SECURITY

During certain hours and on weekends, an electronic key card is required for building entry to ensure that only building tenants have access to the building. All key cards have special codes that are recorded by the security systems to indicate who is entering the building. The outside doors automatically lock after entry. For the personal safety of employees, when entering one of the office suites at MAWIB, please ensure that the door is locked after entry.

In some suites, which have two entry/exit doors, it is a good practice to ensure that both doors are locked, particularly if an employee is working alone in the office. Never leave office doors unlocked or blocked open. If someone is to meet an employee, arrange for them to arrive at a time when it is convenient to admit them, or have them call to gain admittance. If electrical equipment is turned on, please make sure that it is turned off before leaving the office.



*If it is necessary to call 911, contact Security, Human Resources and/or an on-site Director.*

### PROHIBITED CONDUCT

MAWIB will not tolerate any type of workplace violence committed by or against employees. Employees are prohibited from making threats or engaging in violent activities or outbursts. Acts deemed by management as threats, or violent activities will be disciplined up to termination.

### EMERGENCY / CRISIS NOTIFICATION

Any potentially dangerous and/or safety situation(s) must be reported immediately to a Manager/Supervisor, Security or to Human Resources. All reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled and the results of investigations will be discussed with them and potential disciplinary action may be taken. The Agency will actively intervene at any indication of a possibly hostile or violent situation. Incident reports may be obtained by the Human Resources Manager/Supervisor or Security.

### RISK REDUCTION MEASURES

While we do not expect employees to be skilled at identifying potentially dangerous persons, employees are expected to exercise good judgment and to inform a Director, Manager/Supervisor and Human Resources if any employee exhibits behavior which could be a sign of a potentially dangerous situation. Such behavior includes:

- Displaying overt signs of extreme stress, resentment, hostility, or anger;
- Making threatening remarks;
- Sudden or significant deterioration of performance;
- Displaying irrational or inappropriate behavior.

### ENFORCEMENT

Threats, threatening conduct, or any other acts of aggression or violence in the workplace will not be tolerated. Any employee determined to have committed such acts will be subject to disciplinary action, up to and including termination. Non-

employees engaged in violent acts on the employer's premises will be reported to the proper authorities.

### FIRST AID

The First Aid kit is located at the front desk with security. All medical emergencies should be reported to a Manager/Supervisor. Human Resources should be contacted in all cases of potential Workers' Compensation situations. If necessary, 911 should be called to the scene. All on-site accidents and/or injuries must be reported and an incident report completed, even if they require just minimal First Aid. Incident report forms may be obtained at the Office of Human Resources.

### MAINTAINING AN EFFECTIVE WORK ENVIRONMENT

Each employee is responsible for maintaining an effective work environment for themselves and others. Accordingly:

- Minimize distractions such as loud conversations and radio volume which can be heard outside of one's own work area;
- Keep work areas clean;
- Maintain common areas (such as guest cubicles, mail room, break room, etc.) clean and neat; and
- Be considerate of others at all times.

## 9. EMPLOYEE RESPONSIBILITIES

### ABSENCE FROM THE WORK AREA

When leaving the premises, employees must keep their Manager/Supervisor informed of their whereabouts at all times.

### ATTENDANCE

MAWIB places a high value on good attendance. Regular attendance, including punctuality, is an important part of an employee's work record and is considered when granting promotions and salary increases. Excessive absenteeism or tardiness will result in discipline, up to and including termination of employment.

Employees are expected to be at work during their scheduled hours. An employee must give notice to his/her Manager/Supervisor if the employee wants to take a leave of absence. Approval of any leave of absence is at the sole discretion of MAWIB.

A request for leave must be submitted for any paid time off. All requests need the approval of the Manager/Supervisor.

### TARDINESS

Tardiness will not be tolerated. MAWIB recognizes that there are instances where situations arise that, through no fault of the employee, may cause the employee to be late. When this happens, s/he must contact his/her Manager/Supervisor prior to the employee's official start time.

MAWIB is not required to allow the time to be made up. Manager/Supervisors may authorize make-up time. Excessive tardiness is subject to disciplinary action.

### AGENCY COMMUNICATION SYSTEMS

All communication systems used at MAWIB, such as the computer, telephone, cell phones, fax, voicemail, and e-mail, are to be used primarily for conducting Agency business. Occasional personal use is allowed, but such use will be subject to this policy and in compliance with the Agency's communication systems procedural manual.

Examples of occasional personal use are during breaks, lunch or for no more than a few minutes a day during working hours. This personal use is allowed when it does not interfere with an employee's work performance, interfere with any other employee's work performance, unduly impacts the operation of the electronic communication system, or violates any other provision of this or any other MAWIB policies.

If MAWIB determines that an employee's use of the electronic communication system is excessive, the employee will be disciplined up to and including termination from employment.

The Agency communication systems are not totally private and confidential. Even though most systems are password-protected, it is still possible for others to access the systems you are using.

Employees will be instructed on the proper use of the communication systems used at MAWIB for both internal and external business communications. All Agency communication systems and the information maintained on these systems are considered the sole property of the Agency. As the property of the Agency, MAWIB has the right to intercept, monitor, copy, review and download any communications or files created or maintained on these systems. Employees should have no expectation of privacy when using any of these systems.

MAWIB prohibits certain types of communication on our various systems. Prohibited communication includes, but is not limited to, offensive language and disruptive, illegal, harassing, insulting or non-business related or time-consuming messages.

Inappropriate use of any Agency communication system will be grounds for disciplinary action, up to and including termination of employment.

### SOCIAL NETWORKING POLICY

MAWIB's Social Networking Policy has been developed for employees who maintain or participate in personal blogs, personal websites, bulletin boards, or other interactive web media, including but not limited to LinkedIn and Facebook (herein collectively referred to as "blogs"), that contain postings about MAWIB's business, products, or MAWIB employees and the work that they do. This policy is also applicable to MAWIB employees who post about MAWIB on the blogs of others. Employees are reminded that MAWIB's other policies are applicable to employees' blogging conduct, where the blogs contain postings about MAWIB business, products, guests, employees, customers, vendors or products.

All MAWIB employees should understand there is a legal responsibility involved with blogging. Though employees are free to post their own personal views on blogs, employees should know that blogging related in any way to MAWIB, its business, or your employment at MAWIB may lead to imminent irreparable harm to MAWIB or its employees. Moreover, blogging may violate the rights of another employee at MAWIB by posting untrue, defamatory or hurtful information about him/her.

If employees choose to blog, the following guidelines apply anytime an employee blogs as a self-identified MAWIB employee, or posts information relating to their employment with MAWIB, regardless of the site to which the employee posts or the location from where the employee makes the posting.

When you publish your opinions through a blog, you are legally responsible for your commentary. Individual bloggers may be personally liable for comments deemed to

be defamatory (i.e., making false allegations against other employees, guests, vendors, clients or MAWIB – even if you believe the information to be true).

Individual bloggers may also be personally liable for other conduct that is deemed to be tortious (i.e., violate the legal rights of other employees, such as posting information that invades the privacy rights of other employees, individuals, or MAWIB, even if the information posted is true).

MAWIB will not defend you in any legal actions based on your commentary on any blog under any circumstances, whether you are sued by another MAWIB employee, guest, customer, vendor, client or someone who is not affiliated with MAWIB.

When blogging, you should exercise caution with regard to exaggeration, colorful language, guesswork, obscenity, copyrighted materials, legal conclusions, and derogatory remarks or characterizations in any way related to MAWIB, its guests, customers, vendors, clients or its employees. Such remarks or characterizations may subject you to discipline, up to and including termination. In addition, MAWIB or its employees may pursue legal action against you personally.

It is never acceptable to publish any of MAWIB's confidential or proprietary information, or any confidential or proprietary information of any customer, client or donor to which you have access as a result of your employment with MAWIB. Any of MAWIB's confidential, proprietary, or trade secret information is off-limits for your blog. MAWIB's logo and trademarks are also off-limits. Anything related to MAWIB policy, strategy, financial reports, financial situation, products, marketing strategy, or any other information that has not been made public cannot appear in your blog under any circumstances.

Disclosing confidential or proprietary information in your blog will subject you to disciplinary action, up to and including termination of your employment. Moreover, you could be legally liable to MAWIB or others for disclosing such information.

If you have any questions about whether information is confidential or proprietary, you should not post it. If you want additional clarification as to whether information is confidential or proprietary, contact your Supervisor/Manager.

You must make it clear that the views you express are yours alone and that they do not reflect the views of MAWIB. To help reduce the potential for confusion, you must include the following notice in a reasonably prominent place on your site, or if posting on the site of another, you must include it within your post:

*The views expressed on this website/weblog are mine alone and do not necessarily reflect the views of my employer.*

MAWIB's harassment policy applies to comments you make outside the workplace, which includes your blog. It is never acceptable to harass any MAWIB employee through comments made on your blog or any other public website. Employees will be investigated and/or disciplined in accordance with MAWIB's Harassment Policy for inappropriate conduct in their blogs.

If you have any questions concerning this policy, please contact Human Resources.

### EMPLOYEE LOSS OF PROPERTY OR DAMAGE TO AUTOMOBILE

Employees of the Milwaukee Area Workforce Investment Board who incur a loss of property or damage to their automobile due to theft or vandalism while conducting business will be reimbursed by MAWIB for loss subject to all of the following conditions:

1. The theft or vandalism must have occurred while on official MAWIB business;
2. The automobile must have a current registration, license and insurance policy in the employee's name;
3. The employee was prudent in following parking rules and regulations;
4. In the case of loss of property, the property must have been on MAWIB premises or in a locked automobile while on MAWIB business at the time of the loss;
5. The loss or vandalism is immediately reported upon discovery of such to the local authorities, i.e., a police report or insurance company claim and to MAWIB; and
6. The employee has filed a claim under his or her own automobile/homeowners/renters insurance prior to requesting this reimbursement.

MAWIB will reimburse the following expenses:

1. Insurance deductible, not to exceed \$250.00, per incident;
2. The balance of car rental expense up to 50% if your car is stolen or not in condition to drive, provided that the employee carries car rental expense on the policy and follows the insurance company's guidelines and procedures for obtaining the rental car; and
3. Up to one day of time off to handle business related to the loss, theft or vandalism.



Each incident involving loss of property, theft, or vandalism of an employee's automobile will be handled on an individual basis.

Employees should alert MAWIB to any thefts of their personal property occurring on MAWIB premises. Employees are expected to follow MAWIB security procedures regarding the handling of cash, MAWIB equipment, locking of doors, and use of exits and entrances.

## DRESS CODE / PERSONAL APPEARANCE

The purpose of the dress code/personal appearance is to develop a positive set of guidelines to aid staff in their functioning at the Agency. While MAWIB's environment lends itself to a professional dress code, we believe that all employees should dress neatly, in good taste and in properly fitted clothing. This appearance is essential to a favorable impression with participants, guests, regulators, and Board members.

The attire that an employee wears to work should be based on the employee's role within the organization. Hence, different roles and positions will mandate different types of clothing.

Furthermore, Managers/Supervisors are responsible for enforcing dress and grooming standards established in their areas of responsibility that reflect a positive image of the Agency. An employee may be sent home (unpaid) to change the unacceptable attire.

If approved by the Manager/Supervisor, staff are permitted to wear MAWIB logo attire.

Wearing any of the following items is strictly prohibited:

1. Jeans of any sort and color, jean or denim skirts or jackets of any kind;
2. Halter tops, tank tops, jogging and sweat pants of any kind, t-shirts, belly shirts, cut off shirts, muscle shirts, sport related jerseys, strapless tops, spaghetti straps, biker shorts or stretch pants;
3. Tight or revealing apparel (no lower back, bare midriff, front or back);
4. Miniskirts, form fitting pants;
5. Tennis shoes, flip-flops, shower shoes, thong sandals;
6. Hats, skull caps, bandanas, and headscarves of any sort are prohibited for men and women; and



7. Clothing that is ripped, torn, or dirty, and/or displays logos or wording of alcohol beverages or illegal products, sex, violence, political statements, and profanity.

Should you have religious or medical reasons that warrant you to wear attire or any items otherwise prohibited by this policy, please speak with your Manager/Supervisor.

## OUTSIDE EMPLOYMENT AND ACTIVITIES

It is the policy of MAWIB to allow employees to engage in outside activities or hold other jobs, subject to certain restrictions as outlined under the 'Code of Ethics.'

Employees must notify and discuss the outside employment with their immediate Manager/Supervisor.

At no time may the resources or equipment of MAWIB be used for outside employment, activities, or interests without the written approval of the Chief Executive Office of MAWIB of Milwaukee County. If outside activity causes or contributes to job-related problems, it must be discontinued; and, if necessary, normal disciplinary procedures will be followed to deal with specific problems. Employees may not use paid sick time to work outside employment or to be involved in outside activities.

MAWIB requires that employees' activities and conduct away from the job must not compete or conflict with or compromise its interests, or adversely affect job performance and the ability to fulfill all responsibilities to MAWIB.

## SALES AND SOLICITATION

In order to prevent disruptions, interference with work and inconvenience to other employees, sales or solicitation for any cause, or distribution of non-work related literature and goods of any kind, during working time is not permitted. "Working time" excludes authorized breaks or meal periods. Employees may not engage in solicitation of any kind, distribute literature of any kind, or goods during their working time or during the working time of the employee being solicited or receiving literature or goods.

Whether on working time or not, the employee may not distribute non-work related literature of any kind or goods in work areas. The term "work areas" includes all places where the employee regularly works, confers or conducts business.





Solicitation and distribution of literature or goods, should only take place when an employee is off duty and off Agency premises. Persons not employed by the Agency may not solicit for any purpose or engage in distribution of literature of any kind or goods on the Agency's premises at any time.

“Soft-selling” of items for charitable or school purposes such as Girl Scout cookies, candy bars for schools, etc., will be allowed through “passive” solicitations by posting brochures/sign-up sheets for the non-profit or schools but verbally asking co-workers is not permitted.

### SMOKE-FREE WORKPLACE POLICY

In accordance with Wisconsin’s Smoke-Free Workplace law (7-5-2010) it is illegal to smoke in any indoor place that employees enter carrying out their work duties such as office, work area, employee lounge, restroom, conference room, meeting room, classroom, elevator, stairway, lobby, common area, vehicle, cafeteria, or hallway. This policy applies to all employees, guests, visitors and participants.

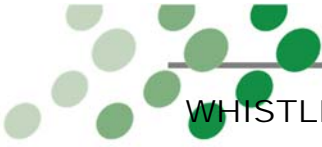
All ‘front entrance’ outdoor areas are non-smoking areas.

The policy regarding smoking for those employees who work with participants under 18 years of age is: Shall not smoke or use tobacco products in front of participants. MAWIB will provide a variety of services to assist employees who desire to stop smoking, including providing information regarding smoking cessation clinics, the Employee Assistance Program (EAP), and referrals to other resources.

Staff adherence to this policy is a condition of employment, and any breach of the policy will lead to disciplinary action.

### USE OF EQUIPMENT AND PROPERTY

The resources of MAWIB (copy machines, color copier, fax machines, postage machine, computers, printers, cameras, or any other office supplies or equipment) are to be used for business purposes only.



## WHISTLEBLOWER POLICY

MAWIB will investigate any possible fraudulent or dishonest use or misuse of Agency resources or property by management, staff, volunteers, or Board members. Anyone found to have engaged in a fraudulent or dishonest conduct is subject to disciplinary action by the Agency up to and including civil or criminal prosecution when warranted.

If an employee wants to report any fraudulent or dishonest conduct, they should go to their immediate Manager/Supervisor. If it is about their immediate Manager/Supervisor, they should report it to Legal Affairs Coordinator. If there is a potential conflict, report it to a Director.

Retaliation against employees who raise concerns or questions about misconduct will not be tolerated.

## CODE OF ETHICS

The trust and respect of all people—employees, program participants, collaborative partners, strategic partners, the greater Milwaukee community, government entities, and the general public—are assets that cannot be purchased. They must be earned every day. This is why MAWIB must conduct all of its business according to the highest ethical, moral and legal standards.

The essence of this policy is that each employee will conduct MAWIB business with integrity, in compliance with applicable laws, and in a manner that excludes considerations of personal advantage.

Further, it is the policy of MAWIB to treat everyone in a fair and equitable manner. No person representing MAWIB shall take unfair advantage of any fellow worker, program participant, subcontractor, or representative of any concern with which we do business. Further, representatives of MAWIB will display dignity and courtesy in business dealings with those inside and outside MAWIB.

The resources of MAWIB, including its money, property, and the time and talent of its employees, are to be used for conducting the business of and meeting the needs of those served by MAWIB. These resources are to be handled prudently by those to whom they are entrusted. They most certainly are not to be diverted to the personal use of any representative of MAWIB.



The internal and external reporting and exchange of information is a critical part of the conduct of our business. All staff must be complete and accurate in our internal and external communication and take all practical steps to ensure that reliable information is provided by MAWIB.

All decisions made on behalf of MAWIB are to be made in the best interest of MAWIB, its employees, program participants, collaborative partners, strategic partners, the greater Milwaukee community, government entities, and the general public.

Thus the acceptance, in a business context, of gifts, loans, entertainment, personal favors of more than nominal value or anything that would influence a business decision, or appear to influence a business decision is prohibited.

No MAWIB asset can be used to support any political candidate. Furthermore, no employee of MAWIB shall coerce any employee, subcontractor or program participant to take any political action that is inconsistent with his personal beliefs. In addition, employees will not campaign for themselves or others on MAWIB time, or using MAWIB's resources.

## CONFLICT OF INTEREST

It is the policy of the Milwaukee Area Workforce Investment Board to prohibit its employees from engaging in any activity, practice, or conduct which conflicts with, or appears to conflict with, the interests of MAWIB.

Employees are expected to represent MAWIB in a positive and ethical manner and have an obligation both to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their supervisor. All employees are required to sign a special statement acknowledging their understanding of and adherence to this policy.

Every employee should avoid any activity in which his or her personal interests are at odds with MAWIB's interests. Any conflict of interest must be disclosed to the MAWIB. Failure to do so may result in discipline, up to and including termination.

Employees are not to accept any employment relationship with any organization that does business with MAWIB. This prohibition on Employment includes serving as an

advisor or consultant to any such organization, unless that activity is conducted as a representative of MAWIB.

- **EMPLOYEE CONDUCT**

On or off the job, employees are not, directly or indirectly, to engage in any conduct which is disloyal, disruptive, competitive, or damaging to MAWIB. Prohibited activity also includes any illegal acts in the restraint of trade.

Employees must disclose any financial interest they or their immediate family have in any firm that does business with MAWIB. MAWIB may require divestiture of such interest if it deems the financial interest to be in conflict with its best interests.

- **GIFTS AND FAVORS**

Employees and their immediate family are not to accept any favors or gifts of more than a nominal value or any discounts or loans from any person or firm having, or seeking to have a business relationship with MAWIB. The meaning of gifts for purposes of this policy includes, but is not limited to the acceptance of entertainment, free travel, meals and lodging.

Employees are not to give, offer, or promise, directly or indirectly, anything of value to any representative of any customer, potential customer, vendor, potential vendor, contractor, potential contractor or of a financial institution in connection with any transaction or business that MAWIB may have as a customer, potential customer, vendor, potential vendor, contractor, potential contractor, or financial institution. Employees are not to engage any firm who has a business relationship with MAWIB for work of a personal nature.

All employees must conduct their business in accordance with the highest ethical standards. No individual who represents or is employed by MAWIB shall engage in fraudulent behavior or make misrepresentations.

MAWIB requires that there be no conflict between the personal interest of employees and that of MAWIB. MAWIB expects all employees to be sensitive to the dangers presented by such conflicts, and to consult with Manager/Supervisors or other sources of advice when doubtful or confusing situations arise. The general rule for recognizing conflicts is that employees must avoid any activity that compromises their judgment, causes them to show undue favoritism to any party, or causes them to receive a benefit of any kind. Appropriate officers, Manager/



Supervisors and employees will be required at periodic intervals to certify compliance with these policies.

Strict adherence to this policy will protect MAWIB and its employees from criticism, litigation or embarrassment that might result from alleged or real conflicts of interest or unethical practices.

## 10. DISCIPLINARY PROCEDURES

It is the philosophy of the Milwaukee Area Workforce Investment Board to make every effort to avoid involuntary termination of an individual's employment.

When an employee commits what MAWIB considers to be an offense, or has a work performance problem the employee will be subject to disciplinary action up to and including termination of employment. The intent of this procedure is to allow the employee to correct undesirable conduct or improve work performance without losing his/her employment.

However, MAWIB reserves the right to substitute steps of discipline, repeat steps, or fashion alternative corrective action after consideration of all pertinent facts. Discipline may consist of; a verbal warning, written warning, suspension or termination.

## 11. SUBSTANCE ABUSE TESTING POLICY/ASSISTANCE PROGRAM

MAWIB has a vital interest in maintaining a safe, healthful and efficient working environment for its employees, participants, volunteers and visitors. Illegal drugs and/or drug abuse (including alcohol abuse) poses a serious threat to the health and safety of the user and to others.

Illicit drugs and/or abuse (including alcohol abuse) will not be tolerated at MAWIB. The unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited by any employee at MAWIB. Also prohibited by MAWIB is reporting to work with a detectable level of an illegal drug, whether that illegal drug was used on or off premises and on or off duty.

All applicants must pass a pre-employment drug test before beginning work or receiving a contingent offer of employment has been extended. Refusal to submit to testing will result in disqualification of further employment consideration.



If there is reasonable suspicion to believe an employee has violated this policy and/or exhibits clear symptoms of being under the influence of drugs and/or alcohol, or if the employee is involved in an on-the-job accident, MAWIB reserves the right to require an employee be tested for illicit drug and/or alcohol usage. Refusal to submit to the test may result in termination. Violators of this policy may be subject to termination.

*Under no circumstances will the employee be allowed to drive him or herself to the testing facility. A member of management must escort the employee; the Manager/Supervisor will make arrangements for the employee to be transported home.*

Employees are subject to post-accident testing when they cause or contribute to accidents that damage a MAWIB vehicle, machinery, equipment, or property and/or result in an injury to themselves or another employee requiring off-site medical attention. A probable cause circumstance will be presumed to arise in any instance involving a work-related accident or injury in which an employee who was operating a motorized vehicle is found to be responsible for causing the accident. In any of these instances, the investigation and subsequent testing must take place within two (2) hours following the accident. *Under no circumstances will the employee be allowed to drive him or herself to the testing facility.*

Employees, who are under a physician's care, and who are taking controlled substances that could affect their performance, must report this treatment to their Manager/Supervisor.

Employees who are convicted for off-the-job drug activity will be considered to be in violation of this policy. Employees charged of any criminal drug violation in the workplace, or while on Agency business must immediately report such charge to their supervisor.

## PROHIBITED CONDUCT

MAWIB's Substance Abuse Policy prohibits a range of conduct, including, but not limited to, the following:

1. Use, possession, manufacture, distribution, dispensation, purchase or sale of alcohol or other drugs at MAWIB or on MAWIB business, or during working hours (except by, and in accordance with, Section III, below);

2. Storing in a locker, desk, automobile or other repository on MAWIB premises any alcohol or other drug (except by, and in accordance with, Section III below);
3. Refusing to provide, switching or adulterating any sample submitted for testing; and
4. Refusing consent to testing or to submit a breath, saliva and/or urine sample for testing when requested by management, or refusing to sign required test-related documents, including, but not limited to, authorization forms.

### AUTHORIZED USE OF PRESCRIBED MEDICINE

An employee who is taking prescription medication in accordance with a valid prescription is not in violation of this policy. Employees taking any medication which causes side effects should disclose the use of such medication and its side effects to their Manager/Supervisor.

### ALCOHOL AND CONTROLLED SUBSTANCES TESTING

Whenever MAWIB has reason to believe that an employee's work performance or on-the-job behavior may have been affected in any way by alcohol or other drugs, or that this Policy has otherwise been violated, MAWIB may require the employee to submit a breath, saliva, and/or urine sample for alcohol and/or drug testing.

MAWIB may require employees involved in work related accidents to undergo such testing for alcohol and other drugs. Testing will be completed as soon as possible following an accident.

The testing facility will afford applicants and employees subject to testing the opportunity, prior to testing, to list all prescription and non-prescription drugs they have used in the last thirty days and to explain the circumstances surrounding the use of such drugs.

Applicants and employees subject to testing, prior to testing, must sign an approved consent form for testing and consenting to the release of test results to MAWIB or designated representative.

MAWIB, prior to taking any action, will give any employee who tests positive an opportunity to explain the test results.



## CONSEQUENCES FOR VIOLATION OF POLICY

Applicants who refuse to cooperate in a drug test or who test positive will not be hired and will not be allowed to re-apply/re-test in the future.

Employees who have tested positive, or otherwise violated this policy, are subject to discipline, up to and including termination.

Depending upon the circumstances and the employee's work history/record, MAWIB may offer an employee who violates this policy or tests positive the opportunity to return to work on a last chance agreement pursuant to mutually acceptable terms. MAWIB also may include follow-up drug testing at times and frequencies determined by MAWIB for a minimum of one (1) year but not more than two (2) years, as well as a waiver of the right to contest any termination resulting from a subsequent positive test. If the employee either does not complete their rehabilitation program or tests positive after completing the rehabilitation program, they will be subject to immediate termination from employment.

Employees who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug in violation of this policy will be terminated.

*If the employee refuses to be tested yet it is believed they are impaired, under no circumstances will the employee be allowed to drive himself or herself home.*

## CONFIDENTIALITY

Information and records relating to positive test results, drug and alcohol dependencies and legitimate medical explanations provided to the Medical Review Officer shall be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files. Such records and information may be disclosed among the CEO and Manager/Supervisors on a need-to-know basis and may also be disclosed where relevant to a grievance, charge, claim or other legal proceeding initiated by or on behalf of an employee or applicant.



## SEARCHES

MAWIB reserves the right to search an employee, the employer's locker, desk or other MAWIB property under the control of the employee, as well as the employee's personal effects or automobile on MAWIB property.

## ASSISTANCE IN OVERCOMING ALCOHOL OR DRUG ABUSE

Early recognition and treatment of alcohol or other drug abuse is important for successful rehabilitation and economic benefit to MAWIB and reduced personal, family, and social disruption. MAWIB is willing to provide assistance to those employees whose use of alcohol or other drugs may be the result of a problem such as alcoholism or chemical dependency, where employees voluntarily request assistance prior to being requested to undergo a drug or alcohol test. Such employees will be allowed to use accrued paid time off or leave of absence and be referred to treatment providers.

Accordingly, MAWIB encourages all employees who may have a problem with substance abuse or alcoholism to obtain assistance in resolving the problem.

The decision of an employee to request assistance in dealing with an alcohol or drug abuse problem will not, by itself, jeopardize the employee's continued employment with MAWIB. Voluntary requests for assistance after discovery in violation of this Policy will not prevent disciplinary action. Treatment for drug and alcohol abuse is a covered benefit of MAWIB's health insurance policy. See the Human Resources Manager/Supervisor for details.

## INSPECTIONS

MAWIB reserves the right to inspect all portions of its premises for drugs, alcohol or other contraband. All employees, contract employees and visitors may be asked to cooperate in inspections of their persons, work areas, and property that might conceal a drug, alcohol, or other contraband. Employees who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline, up to and including termination.

## CRIMES INVOLVING DRUGS

MAWIB prohibits all employees, including employees performing work under government contracts, from manufacturing, distributing, dispensing, possessing or

using an illegal drug in or on MAWIB premises or while conducting MAWIB business. MAWIB employees are also prohibited from misusing legally prescribed or OTC drugs. Law enforcement personnel shall be notified, as appropriate, where criminal activity is suspected.

MAWIB does not desire to intrude into the private lives of its employees, but recognizes that employee's off-the-job involvement with drugs and alcohol may have an impact on the workplace. Therefore, MAWIB reserves the right to take appropriate disciplinary action for drug usage/sale/distribution while off MAWIB premises. All employees who are convicted of, plead guilty to, or are sentenced for a crime involving an illegal drug are required to report the conviction, plea or sentence to Human Resources within five days. Failure to comply may result in automatic termination of employment. Cooperation in complying may result in suspension without pay to allow management to review the nature of the charges and the employee's past record with MAWIB.

#### CONTRACTORS

Contractors who will be working on MAWIB time or premises for an extended period will be required to subject their employees, who are assigned MAWIB work, to the prohibition and testing provisions of this Policy.



YOUR ACKNOWLEDGEMENT

I acknowledge all of MAWIB’s procedures, policies, practices, rules and regulations in this "Employee Handbook." I acknowledge that new Agency procedures, policies, practices, rules and regulations will be communicated to me during my employment. I acknowledge that I have received and reviewed the Agency's "Employee Handbook" and understand and accept the provisions contained herein. I further understand and accept that the terms described in the handbook may be altered, modified, changed or eliminated by the Agency at any time with or without prior notice.

I further understand that the Agency's handbook and any other provision contained herein do not constitute an employment contract, expressed or implied. My employment with MAWIB remains at-will, not for any definite time period, and I may be terminated by MAWIB with or without reason.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

\_\_\_\_\_  
Manager/Supervisor or Human Resources Manager

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date



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**MEMBERSHIP CHART for the WORKFORCE DEVELOPMENT BOARD CERTIFICATION 2015-2016**  
(Use additional sheets as necessary)

**Workforce Development Area Name: Employ Milwaukee**

**Contact Person Name and Title: Mr. Earl Buford, President/Chief Executive Officer**

	Member Name & Title (number each entry)	Business and/or Organization Name, Address, Phone Number, and Email Address	Check if Person is for the Business Category	If Not a Business Representative, Check the Category Member Represents	Nominating Organization	Term Starts On (M/DD/YY)	Term Ends On (M/DD/YY)	NAICS Code for Business Members *
1	Dan Buehrle Regional Managing Director	Principal Financial Wisconsin Business Center: 10200 Innovation Drive, Suite 800 Milwaukee, WI 53266 262-749-8001 buehrle.daniel@principal.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	12/29/2015	3/1/2017	52393
2	Earl Buford President & CEO	Milwaukee Area Workforce Investment Board Inc. 2338 North 27th Street Milwaukee, WI 53210 414-270-1709 earl.buford@milwaukeeewib.org		<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	WIOA	7/1/2014	6/30/2017	813410
3	Carol Burgett WDA 2 Director - Job Service	DWD - Job Service 2701 South Chase Av, Ste C Milwaukee, WI 53207 414-389-6474 carol.burgett@dwd.wisconsin.gov		<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input checked="" type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	DWD	7/1/2013	6/30/2016	561320
4	Sheila D. Cochran Secretary/Treasurer, Chief Operating Officer	Milwaukee Area Labor Council, AFL-CIO 633 South Hawley Road, Ste 110 Milwaukee, WI 53214 (414) 771-7070 sheila@milwaukeeelabor.org		<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	AFL-CIO	7/1/2011	6/30/2017	813930
5	B.G. Robert Cocroft CEO	Center for Veterans Issues, Ltd 315 West Court Street Milwaukee, WI 53212 (414) 345-4272 robert.cocroft@cvivet.org		<input type="checkbox"/> Workforce <input checked="" type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		7/1/2011	6/30/2017	813410

6	Lea Collins-Worachek DVR Workforce Development Director (Milwaukee County)	DWD/Div of Vocational Rehabilitation 2701 South Chase Avenue, Ste C Milwaukee, WI 53207-1450 (414) 389-6452 lea.collinsworachek@dwd.wisconsin.gov		<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input checked="" type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	DWD	7/1/2015	6/30/2018	561310
7	Carla Y. Cross President	Cross Management Services, Inc. 1815 North 4th Street Milwaukee, WI 53212 (414) 449-4920 ccross@cross-management.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	7/1/2015	6/30/2018	813910
8	Randy Crump President/CEO	Prism Technical Management & Marketing Services, LLC 6114 West Capitol Drive, Ste 200 Milwaukee, WI 53216 (414) 847-0990 x104 rcrump@prismtechnical.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	A-A Chamber	7/1/2015	6/30/2018	541611
9	Dr. Darienne Driver Superintendent	Milwaukee Public Schools 5225 West Vliet Street Milwaukee, WI 53208 (414) 475-8002 sommertm@milwaukee.k12.wi.us		<input type="checkbox"/> Workforce <input checked="" type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MPS	3/1/2015	6/30/2017	923110
10	Alicia Dupies Vice President, Community Relations	Milwaukee Bucks 1543 N. 2nd Street, 6th Floor Milwaukee, WI 53212 (414) 227-0699 Adupies@bucks.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	12/29/2015	3/1/2017	71121
11	Michael Fabishak CEO	Assoc General Contractors of Greater Milwaukee 1243 North 10th Street, Ste 175 Milwaukee, WI 53205 (414) 778-4100 mfabishak@agc-gm.org	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	AGC	7/1/2011	6/30/2017	236220
12	Pam Fendt Research Manager	LIUNA, Local No.113 6310 West Appleton Avenue Milwaukee, WI 53210 (414) 659-3803 cell pfendt@liunagroc.com		<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	AFL-CIO	7/1/2015	6/30/2018	813930

13	Andres E. Gonzalez Vice President, Chief Diversity Officer Froedtert & Medical College of Wisconsin	Froedtert Health 200 Woodland Prime, Suite 236 Menomonee Falls, WI 53051 (414) 777-3582 andres.gonzalez@froedtert.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	CHCSeW	12/29/2015	3/1/2017	62199
14	John Kissinger Bd Vice Chair & Treasurer President and CEO	GRAEF 125 South 84th Street, Ste 401 Milwaukee, WI 53214-1470 (414) 266-9133 john.kissinger@graef-usa.com Asst: Maggie Fortmann: (414) 266-9071	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	GMC	7/1/2013	6/30/2016	541330
15	Donald W. Layden, Jr. Board Chair Operating Partner	Baird Venture Partners 777 East Wisconsin Avenue Milwaukee, WI 53202 (414) 277-5134-Ast. Cathy Daeda dlayden@RWBaird.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	GMC	7/1/2015	6/30/2018	561110
16	Dr. Vicki Martin President	Milwaukee Area Tech College (MATC) 700 West State Street Milwaukee, WI 53233 414-297-6320 martinv@matc.edu Ast. Elizabeth Schultz (414) 297-6322		<input type="checkbox"/> Workforce <input checked="" type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		7/1/2014	6/30/2017	611210
17	Lupe Martinez President & CEO	UMOS Corporation Inc. 2701 S. Chase Ave Milwaukee, WI 53207 (414) 389-6002 lupe.martinez@umos.org Ast: Carmen Lerma (414) 389-6002		<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		7/1/2015	6/30/2018	561320
18	Ted Matkom Wisconsin Market President	Gorman & Company, Inc. 5375 North Lake Drive Whitefish Bay, WI 53217 (414) 617-9997: cell tmatkom@gormanusa.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	7/1/2015	6/30/2018	236116
19	Darryl Morin Board Secretary President/CEO	Advanced Wireless, Inc. 5012 West Ashland Way Franklin, WI 53132 (414) 421-2819 dmorin@awimobility.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	LULAC	7/1/2011	6/30/2017	517212



20	Lois O'Keefe Retired Dept. of Labor Staff Member	3350 North Newhall Street Milwaukee, WI 53211 (414) 962-1772 l.okeefe@att.net		<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input checked="" type="checkbox"/> Other		7/1/2014	6/30/2017	
21	Alan S. Perlstein Executive Director	WI Energy Research Consortium 4201 North 27th Street, 7th Flr Milwaukee, WI 53216 (414) 526-1047:cell aperl06355@gmail.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		7/1/2015	6/30/2018	541611
22	David Pifer Managing Attorney	Legal Action 230 West Wells Street Milwaukee, WI 53203 (414) 278-7722 DAP@legalaction.org		<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input checked="" type="checkbox"/> Other	Interfaith Council	3/1/2014	3/1/2017	923130
23	James Roberts Center Director	Milwaukee Jobs Corps Center 6665 North 60th Street Milwaukee, WI 53223 (414) 616-5701 roberts.james@jobcorps.org		<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		7/1/2011	6/30/2017	624110
24	Lauri Rollings Executive Director Plumbing Mechanical Sheet Metal Contractors' Alliance	11001 W. Plank Court, Suite 100 Wauwatosa, WI 53226 414-543-7622 x 253 lauri@pmsmca.com	*X	<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	Building Advantage	12/29/2015	3/1/2017	81391
25	Thelma A. Sias Board Vice President Vice President - Local Affairs	We Energies 231 West Michigan Street, P421 Milwaukee, WI 53203 (414) 221-3651 thelma.sias@we-energies.com Ast: Tracy Ladwig (414) 221-2231	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	7/1/2011	6/30/2017	221112
26	Howard Snyder Executive Director	Northwest Side Community Development Corporation 4201 North 27th Street, 7th Flr Milwaukee, WI 53216 (414) 447-8230 hsnyder@nwscdc.org		<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input checked="" type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		7/1/2013	6/30/2016	926110

27	Karen Spindler VP of Human Resources	DCI Artform 2727 West Good Hope Road Milwaukee, WI 53209 (414) 350-7855:cell spindler@dciartform.com kspindler47@gmail.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	7/1/2013	6/30/2016	541810
28	Rhonda Taylor-Parris Director, Cross Cultural Services	Aurora Health Care 750 West Virginia St. Milwaukee, WI 53234 (414) 219-7855 rhonda.taylorparris@aurora.org	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	3/1/2014	3/1/2017	622110
29	Gwendolyn F. Washington Senior Vice President, Community Affairs/CRA Officer	Associated Bank Corporate Risk Management 815 North Water Street, MS7945 Milwaukee, WI 53202 (414) 278-1069 gwen.washington@associatedbank.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	MMAC	3/1/2014	3/1/2017	522110
30	Wallace White President / CEO	W2Excel, LLC PO Box 240317 Milwaukee, WI 53223 (414) 232-3774 wallace@w2excel.com	X	<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	A-A Chamber	7/1/2013	6/30/2016	541611
31	Patricia Woodard Adjudication Supervisor	DWD - Unemployment Insurance 6081 North Teutonia Avenue Milwaukee, WI 53209 (414) 438-2057 patricia.woodard@dwd.wisconsin.gov		<input type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input checked="" type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other	DWD	7/1/2015	6/30/2018	561320
32	Steven Xiong Refugee Services Director	Catholic Charities 6033 West Lloyd Street Milwaukee, WI 53213 (414) 771-2881 x121 sxiong@ccmke.org		<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		7/1/2013	6/30/2016	624110
33	Renee Zakhar Executive Director	Spotted Eagle, Inc. 3209 West Highland Blvd, Ste 200 Milwaukee, WI 53208 (414) 342-0700 zakhar@spottedeagle.us		<input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Education and Training <input type="checkbox"/> Government and Economic Development <input type="checkbox"/> Other		3/1/2015	6/30/2017	611110

**Key:**

A-A Chamber=African American Chamber of Commerce

AGC=The Associated General Contractors of America

CHCSeW=The Center for Healthcare Careers of SE WI  
GMC=Greater Milwaukee Committee  
LULAC=League of United Latin American Citizens  
MMAC=Metropolitan Milwaukee Association of  
Commerce  
MPS=Milwaukee Public Schools

## **Conflict of Interest Policy**

**Adopted June 10, 2010**

### **SECTION 1. PURPOSE**

The Milwaukee Area Workforce Investment Board, Inc. (“MAWIB”) is a nonprofit, tax-exempt organization. Maintenance of its tax-exempt status is important both for its continued financial stability and for public support. The IRS as well as state regulatory and tax officials view MAWIB’s operations as a public trust, which is subject to scrutiny by and accountable to such governmental authorities as well as to members of the public. The purpose of this conflict of interest policy is to protect MAWIB’s tax-exempt interest status and preserve the public trust.

The board, officers and management employees have the responsibility of administering the affairs of MAWIB honestly and prudently, and of exercising their best care, skill and judgment for the sole benefit of the organization. Those persons shall exercise good faith in all transactions involved in their duties and they shall not use their positions with MAWIB or knowledge gained therefrom for their personal benefit. The interests MAWIB must be the first priority in all decisions and actions taken on its behalf.

### **SECTION 2. PERSONS CONCERNED**

This statement is directed not only to directors and officers, but to all employees who can influence the actions of MAWIB. For example, this would include all who make purchasing decisions, all persons who might be described as “management personnel,” and anyone who has proprietary information concerning MAWIB.

### **SECTION 3. AREAS IN WHICH CONFLICT MAY ARISE**

Conflicts of interest may arise in the relations of directors, officers and management employees with any of the following third parties:

1. Persons and firms supplying goods and services to MAWIB.
2. Persons and firms from whom MAWIB leases property and equipment.
3. Persons and firms with whom MAWIB is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities or other property.
4. Competing or affinity organizations.
5. Donors and others supporting MAWIB.
6. Agencies, organizations and associations which affect MAWIB’s operations.
7. Family members, friends and other employees.

### **SECTION 4. FINANCIAL INTERESTS**

A conflict of interest is generally defined as a financial interest, direct or indirect, with any person or firms mentioned in Section 3. Such an interest might arise through:

1. Owning stock or holding another proprietary interest in any third party dealing with MAWIB.
2. Holding office, serving on the board, participating in management or being otherwise employed (or formerly employed) with any third party dealing with MAWIB.
3. Receiving remuneration for services with respect to individual transactions involving MAWIB.
4. Using MAWIB's time, personnel, equipment, supplies or goodwill for other than MAWIB – approved activities, programs and purposes.
5. Receiving personal gifts or loans from third parties dealing or competing with MAWIB. Receipt of any gift is disapproved except gifts of a value of less than \$50. No personal gift of money should ever be accepted.

A financial interest is not necessarily a conflict of interest. A person who has a financial interest may have a conflict of interest only if after full disclosure, the appropriate governing board or committee decides that a conflict of interest exists.

The lists provided in Section 3 and Section 4 are not intended to be exhaustive. Conflicts might arise in other areas or through other relations. These lists are provided to assist directors, officers and management employees in recognizing potential conflict areas by analogy.

## **SECTION 5. DISCLOSURE POLICY AND PROCEDURE**

It is the policy of the board that the existence of any of the interests described in Section 4 shall be disclosed before any transaction is consummated. It shall be the continuing responsibility of the board, officers and management employees to scrutinize their transactions and outside business interest and relationships for potential conflicts and to immediately make such disclosures.

Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following are observed:

1. The conflicting interest is fully disclosed;
2. The person with the conflicting interest is excluded from the discussion and approval of such transaction;
3. A competitive bid or comparable valuation exists; and
4. The board determines that the transaction is in the best interest of the organization.

Disclosure by a managing employee should be made to the chief executive officer (or if he/she is the one with the conflict, then to the board chair), who shall bring the matter to the attention of the board or duly appointed committee. Disclosure involving directors should be made to the board chair (or if he/she is the one with the conflict, then to the board vice-chair) who shall bring these matters to the board or duly appointed committee.

The board or duly appointed committee shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair and reasonable to MAWIB. The decision of the board or duly appointed committee on these matters will rest in their sole discretion and their concern must be directed to MAWIB's best interests and the

advancement of its purposes. The minutes of the board or governing committee meeting at which a transaction is decided upon shall contain:

1. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest and any action taken to determine whether a conflict of interest was present and the board's or committee's decision as to whether a conflict of interest in fact existed.
2. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement and a record of any vote taken in connection with the proceedings.

## **SECTION 6. ANNUAL DISCLOSURE**

Each director, officer and management employee shall annually sign a statement which affirms such person has read and understand the conflicts of interest policy and agrees to comply with its terms. In addition, each director, officer and management employee shall complete a conflict of interest disclosure statement.

## **SECTION 7. COMPENSATION**

A voting member of the board who receives compensation, directly or indirectly, from MAWIB for services is precluded from voting on matters pertaining to that member's compensation.

A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly from MAWIB for services is precluded from voting on matters pertaining to that member's compensation.

No voting member of the board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from MAWIB, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

## **SECTION 8. VIOLATIONS OF CONFLICTS OF INTEREST POLICY**

If the board or duly appointed committee has reasonable cause to believe an officer, director or management employee has failed to disclose actual or possible conflicts of interest, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged failure to disclose. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

**SECTION 9. PERIODIC REVIEW**

To ensure that MAWIB operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

1. Whether compensation arrangements and benefits are reasonable, based on competent survey information and the result of arm's length bargaining.
2. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or an excess benefit transaction.



### 2017 SCHEDULE of BOARD & COMMITTEE MEETING DATES

MEETING TYPE	LOCATION	2017 DATES
<b>BOARD OF DIRECTORS</b> Quarterly – 2 <sup>nd</sup> Thursday 8:30 - 10:00 am	Rotating	March 23 June 8 September 14 December 14
<b>EXECUTIVE COMMITTEE</b> Quarterly Thursdays 10:00– 11:30 am	Employ Milwaukee Offices 2342 North 27th Street Room 116	March 2 May 25 August 31 November 30
<b>PERSONNEL &amp; FINANCE COMMITTEE</b> Quarterly Thursdays 8:30 - 10:00 am	Employ Milwaukee Offices 2342 North 27th Street Room 116	March 2 May 25 August 31 November 30
<b>PROGRAM COMMITTEE</b> Quarterly – 3 <sup>rd</sup> Wednesday 9:00 - 10:30 am	Employ Milwaukee Offices 2342 North 27th Street Room 116	February 15 May 17 August 16 November 15



**SIXTH AMENDED & RESTATED BYLAWS**  
**OF**  
**EMPLOY MILWAUKEE, INC.**

**SIXTH AMENDED AND RESTATED BYLAWS  
OF  
EMPLOY MILWAUKEE, INC.**

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**SIXTH AMENDED & RESTATED BYLAWS OF  
EMPLOY MILWAUKEE, INC.**

**ARTICLE I. THE CORPORATION.**

Section 1.1. Authority.

Employ Milwaukee, Inc. (the "Corporation") is a nonstock, nonprofit corporation organized under the laws of the State of Wisconsin. Except as otherwise provided in the Articles of Incorporation of the Corporation (the "Articles"), the Corporation shall have all the authority necessary to achieve its purposes and shall be permitted to do all things that can be done by a nonstock, nonprofit corporation organized under the laws of the State of Wisconsin, and exempt from federal income taxation under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended ("Code").

Section 1.2. Corporate Offices.

The principal office of the Corporation shall be 2342 N. 27th Street, Milwaukee, Wisconsin 53210, or such other location as may be determined by the Board of Directors from time to time. The Corporation shall have and continuously maintain in this State a principal office and a registered agent whose office address may be, but need not be, identical with such principal office. The Corporation may have other offices within the State of Wisconsin, as the Board may determine.

Section 1.3. Purposes.

The Corporation is organized and shall be operated exclusively for the charitable and educational purposes set forth in the Articles. In furtherance of these charitable and educational purposes, the Corporation may undertake activities in consideration of the separate workforce needs of adults, dislocated workers and youth, including: to provide a one-stop delivery system with employment opportunities, training, mentoring, referrals and other core employment services; to provide training and communications in consideration of the needs and specifications of area employers; to develop and implement strategies and programs to advance worker skills and qualifications, retain workers, remove barriers to entry, provide ongoing and continued growth and development opportunities, and defined career paths for workers; to maximize local workforce participation in a competitive global marketplace and provide a living wage; to consider new pilot programs or models with prior demonstrated success for workforce development; to apply for and receive grants, donations and contributions by public and private entities; to own property, incur indebtedness, invest funds, contract in the name of the Corporation; to employ administrative staff and conduct business operations; and to exercise all powers conferred upon a Wisconsin non-stock, non-profit corporation. Consistent with its lawful purposes, the Corporation is intended to act as the recipient, dispenser and administrator of funds under and pursuant to the intent and purposes of the Workforce Innovation and Opportunity Act, 29 U.S.C. 3101 et seq. (public law 113-128) ("the Act"). Notwithstanding any other provisions of these Articles, the Corporation shall carry only activities permitted to be carried on: (a) by a

corporation exempt from Federal Income tax under Section 501 (c)(3) of the Code; and (b) by a non-private foundation within the meaning of section 509(a)(1 ) and 170(b)(1 )(A)(vi) of the Code, contributions to which are deductible under Section 170 of the Code, other than as an insubstantial part of its activities as permitted by the Code.

## ARTICLE II. MEMBERS.

### Section 2.1. No Members.

The Corporation shall have no members.

## ARTICLE III. BOARD OF DIRECTORS.

### Section 3.1. Powers.

Subject to the limitations of the Articles, these Bylaws and state and federal law, the affairs of the Corporation shall be managed by or under the direction of its Board of Directors. The Board of Directors shall have full power and authority to perform any and every lawful act deemed necessary or proper to carry out the purposes of the Corporation. The Board of Directors shall have the power to enact, maintain and enforce, and amend, alter and repeal, all suitable lawful resolutions, rules and regulations for the governance of the Corporation and perform other acts not inconsistent with state and federal law, these Bylaws, or the Articles.

### Section 3.2. Number, Qualifications, Appointment, Terms, Resignation and Removal, Vacancies.

(a) Number. The number of Directors shall be a minimum of twenty-one (21) and maximum of thirty-six (36), the exact number of Directors shall be fixed by resolution of the Board from time to time.

(b) Qualifications, Method of Appointment. The Directors shall be appointed by the Chief Local Elected Official (Mayor of the City of Milwaukee) in accordance with the Act and the Memorandum of Agreement between the Mayor of the City of Milwaukee and Employ Milwaukee, Inc., as both may be amended from time to time. The Board of Directors shall include a majority of business representatives, and representatives of education providers, labor organizations, community-based organizations, including organizations representing disabled and veteran communities, economic development agencies, and one-stop partner participants, or other representatives as the Chief Local Elected Official deems appropriate.

(c) Term of Office. The term of each Director shall be between one (1) and three (3) years. The terms of Directors shall be staggered, so that approximately one-third (1/3) of the Board of Director's term expires each year, such terms to be established in the manner directed by the Board.

(d) Resignation or Removal. A Director of the Corporation may resign at any time by filing a written resignation with the Secretary. Further, at any meeting of the Board of Directors with respect to which notice of such purpose has been provided, a Director may be removed from office, for cause (cause shall include chronic and repeated non-participation in Board and Committee meetings), upon affirmative vote of three-fourths (3/4) of all other Directors then in office.

(e) Vacancy. A vacancy on the Board of Directors shall be filled by the Chief Local Elected Official for the unexpired portion of the Director's term.

Section 3.3. Meetings, Notice, Quorum, Voting.

(a) Annual Meetings. There shall be a regular annual meeting of the Board of Directors at the office of the Corporation during the fourth quarter of the calendar year, or at such other place and time as may be designated by the Chairperson of the Board.

(b) Regular Meetings. Regular meetings of the Board of Directors shall be held as called by the Chairperson of the Board or President.

(c) Special Meetings. Special meetings of the Board of Directors may be called by the Chairperson of the Board, President, or a majority of the Directors then in office.

(d) Notice. Notice of the date, time and place of any meeting shall be given to each Director by mail, personal delivery, email or fax at least forty-eight (48) hours prior thereto, or unless a different time shall be required by law. If mailed, such notice shall be deemed to be effective when the correspondence is delivered to a Director at his or her address as it appears on the records of the Corporation, with postage thereon prepaid. A Director may waive notice of any meeting in writing, signed at any time before or after the time of the meeting. The attendance of a Director at a meeting shall constitute a waiver of notice of such meeting, except where a Director attends the meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened. Meetings of the Board of Directors shall be open to the public and public notice of such meetings shall be provided in accordance with Wis. Stat. § 19.84 or any successor statute.

(e) Participation by Electronic Means. Any one or more Directors may participate in, and shall be deemed present at, any meeting conducted by means of communication whereby all participating Directors may simultaneously hear each other during the meeting.

(f) Quorum. At least one-third (1/3) of Directors then in office shall constitute a quorum of the Board of Directors, but a majority of the Directors present at a meeting, though less than such quorum, may adjourn the meeting from time to time without further notice.

(g) Action. At each meeting of the Board of Directors, each Director shall be entitled to cast one (1) vote on all matters presented to the Board for its approval. The act of a majority of Directors in attendance at a meeting at which a quorum is present shall be the act of the Board, except to the extent that a greater number is required by law, the Articles or these Bylaws.

Section 3.4. Authority of Board.

The Board of Directors shall maintain authority over all of the following matters, and no such matter shall become effective without the prior approval of the Board:

- (a) Amendment or restatement of the Articles or these Bylaws.
- (b) Annual election of Officers of the Corporation.
- (c) Annual ratification of individuals appointed by the Chairperson of the Board to comprise the Committees of the Board and approval of Committee charters delegating authority to Committees.
- (d) Ratification of individuals appointed by the Chairperson of the Board to comprise the Work Groups of the Board, and the purposes and timelines for accomplishment of related responsibilities.
- (e) Sale, lease, exchange or other distribution of substantially all of the property or assets of the Corporation other than in the usual and regular course of business.
- (f) Except as otherwise expressly provided in these Bylaws, authorization to bind the Corporation by any contract or engagement; pledge the Corporation's credit; render the Corporation liable for any purpose in any amount; contract for loans; and/or issue any evidence of indebtedness in the name of the Corporation.
- (g) Any other matters as may be specifically reserved by Board action.

Section 3.5. Reimbursement of Expenses.

Upon resolution of the Board of Directors, any one or more Directors may be paid or reimbursed for reasonable expenses incurred on behalf of the Corporation. Except as specifically provided in these Bylaws or as otherwise determined by the Board of Directors, no Director shall receive any other compensation or reimbursement for his or her services as a Director or Committee member.

**ARTICLE IV. COMMITTEES, WORK GROUPS.**

Section 4.1. Executive Committee.

(a) Composition. The Executive Committee shall be comprised of Directors who serve as Officers of the Corporation and up to three (3) additional Directors appointed by the Chairperson of the Board. The Chairperson of the Board of Directors shall serve as the chairperson of the Executive Committee.

(b) Authority and Responsibility. The Executive Committee shall have and may exercise the authority of the Board of Directors between meetings of the Board, except as authority is reserved exclusively to the Board of Directors as provided in Section 3.4 hereof. Notwithstanding the foregoing, the Executive Committee shall have the authority to approve programmatic contracts. The Executive Committee shall have the authority to take action in other matters pertaining to contracting, program related expenditures, and the financial interests of the Corporation. The actions of the Executive Committee shall be reported to the Board of Directors at the Board's next meeting.

(c) Meetings. The Executive Committee shall hold meetings as called by the Chairperson of the Board or President.

Section 4.2. Personnel, Finance, and Audit Committee.

(a) Composition. The Chairperson of the Board of Directors shall appoint at least three (3) Directors to comprise the Personnel, Finance and Audit Committee, subject to the approval of the Board. The Treasurer shall serve as the chairperson of the Personnel, Finance and Audit Committee, subject to approval of the Board.

(b) Authority and Responsibility. The Personnel, Finance and Audit Committee shall establish compensation and benefit plans, evaluate performance of senior executives, advise management on significant human resource matters, periodically review the financial condition of the Corporation, approve the Corporation's annual audit, and perform other duties delegated by the Board of Directors. The Personnel, Finance and Audit Committee shall recommend financial, risk management and privacy policies and shall ensure that appropriate internal controls are exercised in the Corporation's operations. The Committee shall monitor and ensure that all of the financial interests of the Corporation have been provided for and attended to. The Committee shall ensure that the authorized body approving compensation arrangements meets the rebuttable presumption test of the Code section 4958 and Treasury Regulation Section 53.4958-6. The actions of the Personnel Finance, and Audit, shall be reported to the Board of Directors at the Board's next meeting.

(c) Meetings. The Personnel, Finance and Audit Committee shall hold regular meetings at least twice annually, and special meetings as determined by the Treasurer.

Section 4.3. Program Committee.

(a) Composition. The Chairperson of the Board of Directors shall appoint at least three (3) Directors to comprise the Program Committee, subject to the approval of the Board. The Chairperson of the Board of Directors may appoint a Director to serve as chairperson of the Program Committee, subject to the approval of the Board.

(b) Authority and Responsibility. The Program Committee shall review, evaluate, and recommend programmatic proposals, contracts, and policies. Any such recommendations may be presented to the Executive Committee for approval when acting between Board



meetings. The actions of the Program Committee shall be reported to the Board of Directors at the Board's next meeting.

(c) Meetings. The Program Committee shall hold regular meetings at least four times annually and special meetings as determined by its chairperson.

Section 4.4. Governance, Compliance and Nominating Committee.

(a) Composition. The Chairperson of the Board of Directors shall appoint at least three (3) Directors to comprise the Governance, Compliance and Nominating Committee, subject to approval of the Board. The Chairperson of the Board of Directors may appoint a Director to serve as chairperson of the Governance, Compliance and Nominating Committee, subject to the approval of the Board.

(b) Authority and Responsibility. The Governance, Compliance and Nominating Committee shall assist in identification, screening and interview of potential candidates, at the request of the Chief Local Elected Official, for appointment to the Board of Directors in accordance with the Act. The Committee shall also apprise the Board on best governance practices, and conduct an annual review of the governing documents to report to the Board of Directors. The Committee shall develop, implement and monitor Board policy for reports of all Committees, Work Groups or for other advisory groups. The Committee shall review the Conflict of Interest Policy, and policies pertaining to ethics, codes of conduct, whistleblowers, document retention and destruction, and other policies to implement best governance practices. The Committee shall present a compilation of those policies requiring Board oversight and approval to the Board of Directors annually for consideration and disclosure of interests. The Committee is responsible for the status of compliance with laws and regulations affecting the Corporation's operations, such as the Workforce Investment Act and Internal Revenue Code. The actions of the Committee shall be reported to the Board of Directors at the Board's next meeting.

(c) Meetings. The Governance, Compliance and Nominating Committee shall hold regular meetings at least three times annually and special meetings as determined by its chairperson.

Section 4.5. Other Committees.

The Corporation shall have such other Committees as may be established by the Board of Directors. Each Committee shall consist of at least three (3) or more Directors. The Chairperson of the Board shall appoint individuals to comprise each Committee and individuals to serve as chairpersons, subject to the approval of the Board. Any Committee so appointed has such powers and authority as are explicitly delegated by the Board, subject in all cases to the Board's reservation of powers in Section 3.4 hereof. The actions of such Committees shall be reported to the Board of Directors at the Board's next meeting.

Section 4.6. Work Groups.

The Corporation may through board resolution establish Work Groups, for projects with definitive start and end dates, normally one (1) year or less. Each Work Group shall consist of at least three (3) or more Directors. The Chairperson of the Board shall appoint individuals to comprise each Work Group, and individuals to serve as chairpersons, subject to the approval of the Board. Any Work Group so appointed has such powers and authority as are explicitly delegated by the Board, subject in all cases to the Board's reservation of powers in Section 3.4 hereof. The actions of such Work Groups shall be reported to the Board of Directors at the Board's next meeting.

Section 4.7. Quorum, Voting.

A majority of the members then serving shall constitute a quorum of the Committee or Work Group, but a majority of Committee or Work Group members present at a meeting, though less than such quorum, may adjourn the meeting from time to time without further notice. The act of a majority of Committee or Work Group members in attendance at a meeting at which a quorum is present shall be the act of the Committee or Work Group. Committees shall document meetings in minutes contemporaneously (within 30 days) of the meeting.

**ARTICLE V. OFFICERS.**

Section 5.1. Selection, Term, Resignation and Removal of Officers.

(a) Officers. The Officers of the Corporation shall consist of a Chairperson of the Board, Secretary, Treasurer, and President. Any two or more offices may be held by the same person, except that the individual serving as Secretary may not concurrently serve as either the Chairperson of Board or President. Other Officers and/or Assistant Officers may be elected by the Board of Directors as it deems necessary, including, but not limited to, a Vice Chairperson of the Board and a Vice President.

(b) Election and Term. The Officers of the Corporation shall be elected by a majority vote of the Board of Directors at each annual meeting of the Board of Directors, except that the President shall be appointed by the Chief Local Elected Official and that the Chairperson for purposes of continuity shall customarily be elected biennially. The Chairperson must be elected from the business representatives of the Board in accordance with the Act. Officers shall serve terms of one (1) year, or in the case of the Chairperson customarily two (2) years, and until their respective successor has been duly elected by the Board, unless such officer dies or is removed as hereinafter provided. Terms shall begin immediately following the annual meeting at which such Officers are elected. Officers shall be elected by the Board from among those individuals who have been selected to serve as the Directors of the Corporation for such time period. Any Officer may serve an unlimited number of consecutive terms in the same office.

(c) Resignation or Removal. Any Officer may resign at any time by filing a written resignation with the Chairperson of the Board, with a copy to the Secretary. Any Officer may be

removed with or without cause upon the affirmative vote of a majority of Directors then in office.

(d) Vacancy. In case of a vacancy arising during the year in any office, by resignation or for any other reason, the Board of Directors shall fill such vacancy for the unexpired portion of the term no later than the next regularly scheduled Board meeting.

Section 5.2. Duties.

(a) Chairperson. The Chairperson shall preside at all meetings of the Board of Directors and the Executive Committee, and shall perform all business and duties customarily pertaining to the office of the Chairperson and such other duties as he or she may be directed to perform by the Board of Directors.

(b) Vice Chairperson. If elected by the Board of Directors, the Vice Chairperson shall perform the duties of the Chairperson of the Board in the absence of the Chairperson or in the event of inability or refusal to act, and when acting shall have all the powers of and subject to all the restrictions upon the Chairperson. The Vice Chairperson shall customarily serve as a successor to the Chairperson, subject to Board approval.

(c) President. The President shall be the chief executive officer of the Corporation, and subject to the control of the Board of Directors, shall in general supervise and control all of the business and affairs of the Corporation. The President shall perform all duties incident to the office and such other duties as may be prescribed by the Board from time to time, provided, however, that the President may delegate such authority as he or she deems reasonably necessary. The President shall be responsible for the selection, general management, and supervision of such staff, agents, consultants, and professional services within the budget of the Corporation and consistent with the personnel policies adopted by the Board. The President shall have authority to sign all bank checks or orders for the payment of money, and all other documents of the Corporation as authorized by the Board. The President shall have the authority without Board approval, to execute: i) any contract valued at \$50,000 or less, subject to the procurement requirements of the funding source; and ii) any subcontract with a partner that is included in a grant award and approved by the funding source.

(d) Vice President. If elected by the Board of Directors, the Vice President shall perform the duties of the President in the absence of the President or in the event of inability or refusal to act, and when acting shall have all the powers of and subject to all the restrictions upon the President. The Vice President shall have the authority to sign all bank checks or orders for the payment of money as authorized by the Board.

(e) Secretary. The Secretary shall ensure that minutes are kept with respect to all proceedings of the Board of Directors. The Secretary shall perform such additional duties as may customarily pertain to the office of Secretary, or as may be directed by the President or by the Board of Directors.

(f) Treasurer. The Treasurer shall oversee the receipt and deposit of all funds of the Corporation in the depository institution(s) selected by the Board of Directors. The Treasurer shall perform such additional duties as may customarily pertain to the office of Treasurer, or as may be delegated or assigned by the President or the Board of Directors. The Treasurer shall have the authority to sign all bank checks or orders for the payment of money as authorized by the Board. The Treasurer shall serve as chairperson of the Personnel, Finance and Audit Committee and shall provide the Board an Annual Financial Statement following the close of each fiscal year.

## **ARTICLE VI. INDEMNIFICATION OF OFFICERS, DIRECTORS AND OTHERS.**

### **Section 6.1. Indemnification.**

The Corporation shall, to the maximum extent permitted under the Wisconsin nonstock corporation law, as amended, indemnify against liability and allow reasonable expenses of any person who was or is a party or threatened to be made a party to any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative or investigative, by reason of the fact that he or she is or was a Director or Officer of the Corporation; or is or was serving at the request of the Corporation as a director or officer of any other corporation or enterprise. Such right of indemnification shall inure to the benefit of the heirs, executors, administrators and personal representatives of such a person.

### **Section 6.2. Supplementary Benefits.**

The Corporation may supplement the right of indemnification under Section 6.1 by the purchase of insurance, indemnification agreements, and advances for related expenses of any person indemnified.

## **ARTICLE VII. CORPORATE SEAL.**

### **Section 7.1. No Corporate Seal.**

The Corporation shall not have a corporate seal.

## **ARTICLE VIII. CORPORATE ACTS AND LOANS.**

### **Section 8.1. Execution of Contracts and Instruments.**

Except as otherwise provided in these Bylaws, the Board of Directors may authorize any Officer or Officers, agent or agents, to enter into any contract or execute and deliver any instruments in the name of and on behalf of the Corporation, and such authorization may be general or confined to specific instances. Except as so authorized, or as otherwise expressly provided in these Bylaws, no Director, Officer, agent or employee shall have any power or

authority to bind the Corporation by any contract or engagement or to pledge its credit or to render it liable for any purpose in any amount.

Section 8.2. Loans.

No funded indebtedness shall be contracted on behalf of the Corporation and no evidences of such indebtedness shall be issued in its name unless authorized by a resolution of the Board of Directors. Such authority may be general or confined to specific instances.

**ARTICLE IX. FISCAL MATTERS.**

Section 9.1. Fiscal Year.

The fiscal year of the Corporation shall correspond to the Act fiscal year.

Section 9.2. Deposits.

All funds of the Corporation, not otherwise employed, or subject to immediate distribution, shall be deposited from time to time to the credit of the Corporation in such banks, savings and loan associations, trust companies or other depositories as the Board of Directors may select.

Section 9.3. Checks, Drafts. Etc.

All bank checks and orders for the payment of money shall be signed or endorsed by the President, Vice President (if elected), or Treasurer; however, upon resolution, the Board of Directors may additionally authorize any officer or officers, agent or agents for such signature or endorsement. All other documents of the Corporation, including notes or other evidence of indebtedness issued in the name of the Corporation, shall be signed or endorsed by the President as authorized by the Board of Directors.

Section 9.4. Books and Records.

The Corporation shall keep correct and complete books and records of account and shall also keep Minutes of the proceedings of the Board of Directors.

**ARTICLE X. CONFLICTS OF INTEREST.**

Section 10.1. Interest of Directors and Others.

No member of the Board shall cast a vote on the provision of services by that member (or any organization which that member directly represents) or vote on any matter which would provide direct financial benefit to that member. Subject to the provisions of the Act, Code, Articles, Bylaws, Workforce Policy and Procedures Manual published by the State of Wisconsin

Department of Workforce Development, and the Memorandum of Agreement described in Section 3.2(b) hereof, the Corporation may enter into any contract or transaction with one or more of its Directors, Officers, or Committee members on the condition that:

- (a) The material facts as to the relationship of the interest to the contract or transaction are disclosed or are known to the Board.
- (b) The Board in good faith authorized the contract or transaction by the affirmative vote of a majority of the disinterested Directors.
- (c) The contract or transaction is fair as to the Corporation as of the time it is authorized, approved or ratified by the Board.

Interested Directors may be counted in determining the presence of a quorum at a meeting of the Board which authorizes, approves or ratifies a contract or transaction on the conditions set forth in the Article but may not vote.

Section 10.2. Impropriety.

The Directors shall avoid organizational and personal conflict of interest in awarding financial assistance and in procurement activities involving funds under the Act.

Section 10.3. Kickbacks.

No Director or employee of the Corporation shall solicit or accept gratuities, favors or anything of monetary value from any person in return for preferential treatment.

Section 10.4. Nepotism.

No Director or employee of the Corporation shall effectively recommend or decide to hire, promote or establish the salary of another person when the person affected is a member of his or her immediate family. No Director or employee shall give preferential treatment in the supervision or management of another employee who is a member of his or her immediate family.

Section 10.5. Nondiscrimination.

No participant, staff person or administrator shall be discriminated against, denied benefits, denied employment, or excluded from participation in connection with any Corporation-funded program on the basis of race, color, religion, sex, National origin (ethnic status), age, disability, marital status, sexual orientation, political affiliation or belief, arrest or conviction record. Participation shall be open to citizens and nationals of the U.S., lawfully admitted permanent resident aliens, lawfully admitted refugees and parolees and other individuals authorized by the U.S. Attorney General to work in the U.S. as well as to persons in offender status.

Section 10.6. Compliance.

Violation of the provision of this article by Officers or Directors shall constitute grounds for removal from office.

**ARTICLE XI. AMENDMENTS.**

Section 11.1. Amendments.

The Articles and/or these Bylaws may be amended or restated at any meeting of the Board of Directors, upon the affirmative vote of a majority of the Directors then serving; provided, however, that such action shall be invalid unless written notice of such meeting is given to all Directors at least thirty (30) days in advance thereof, with such notice expressly stating that the proposed amendment or restatement shall be presented for discussion and action at such meeting. Any amendment or restatement of the Articles or these Bylaws shall be consistent with the requirements imposed upon organizations exempt from federal income tax under Section 501 (c)(3) of the Code.

**CERTIFICATE REGARDING SIXTH AMENDED AND RESTATED BYLAWS**

The undersigned, Earl Buford, acting in his capacity as Chairperson of the Employ Milwaukee, Inc. ("Corporation"), hereby attests that the attached Sixth Amended and Restated Bylaws were adopted by the Board of Directors of the Corporation at a meeting duly called and held on the 10<sup>th</sup> day of December, 2015.

Signed this 10<sup>th</sup> day of December, 2015.

Employ Milwaukee, Inc.

  
\_\_\_\_\_  
Earl Buford, President



## Milwaukee Area Workforce Investment Board Job Description

Job Title: Chief Executive Officer  
Division: CEO Office  
Reports To: Board of Directors  
Prepared By: Human Resources Manager  
Prepared Date: September 2013

### SUMMARY:

The MAWIB Chief Executive Officer (CEO) reports to and receives direction from the MAWIB Board of Directors. The CEO is a highly visible representative responsible for developing strong relationships with key civic, political, and business leaders with the goal of working to develop workforce solutions that meet and anticipate regional economic development needs.

### ESSENTIAL DUTIES and RESPONSIBILITIES:

- Plans, directs, and coordinates operational activities at the highest level of management with the help of Directors and Managers to ensure the smooth operation of the organization and the appropriate alignment of operational strategies to the mission of the organization.
- Represent and promote the organization and its objectives and strategies in a variety of forums, with federal, state and local governments, partnering organizations, and businesses.
- Build strategic working relationships with key individuals in the public and private sector to meet regional economic developmental needs.
- Coordinate workforce development initiatives with the chief local elected official.

### SUPERVISORY RESPONSIBILITIES:

Directly supervises three Directors, Planning, Programming & Fund Development, Operations and Administration. Carries out supervisory responsibilities in accordance with the organization's policies and applicable laws. Responsibilities include interviewing, hiring, and training employees; planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.

### QUALIFICATIONS:

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

### EDUCATION and/or EXPERIENCE:

- Master's degree in business administration, management, social science, human resources, training and development, organizational leadership, counseling, career and technical education, or a related field from an accredited college or university (preferred). Bachelor's degree in a related field required.
- Five years of increasingly responsible experience in the field of workforce development performing duties related to this position, including at least two years of supervisory experience. *Equivalent combinations of education and experience may be considered.*
- The person in this position must be willing to travel on a weekly basis and must maintain a valid driver's license throughout employment.

### KNOWLEDGE, SKILLS and ABILITIES:

- Knowledge of the following: workforce development, training, and employment principles and practices; economics concepts; and business, marketing, and accounting principles.
- Knowledge of mathematics and the ability to make accurate calculations.
- Ability to read and interpret complex work-related documents such as governmental regulations and periodicals.
- Strong oral communication and presentation skills, including the ability to effectively respond to sensitive inquiries or complaints from managers, elected officials, clients, the media, and the public.

- Excellent written communication skills, including the ability to write reports, business correspondence, and articles.
- Interpersonal skills and the ability to forge collaborative partnerships with both public and private stakeholders, including business representatives, officials, community and faith-based organizations, and individual clients of all ages and backgrounds.
- Leadership and supervisory skills, including the ability to interview, hire, and train employees; plan, assign, and direct work; appraise performance; reward and discipline employees; and address complaints and resolve problems.
- Ability to provide operational oversight and support for senior management in the areas of strategic planning, budgeting, communications, organizational performance, finances, and resource allocation.
- Ability to understand and effectively meet the job-related training, educational, and employment needs of various disadvantaged populations by directing, implementing, and monitoring an array of programs and initiatives.
- An understanding of the capabilities of information technology, both to improve organizational effectiveness and to enhance the experience of clients.
- Effective analytical, problem-solving, and decision-making skills.
- Ability to collect and interpret data and produce reports.
- Ability to plan, organize, and accomplish work, manage multiple assignments simultaneously, and meet deadlines, and the ability to adjust course as conditions require.
- Honesty and integrity.

**PHYSICAL DEMANDS:**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is regularly required to sit; use hands to finger, handle, or feel; and reach with hands and arms. The employee frequently is required to talk or hear. The employee is occasionally required to walk. The employee must occasionally lift and/or move up to 25 pounds.

**WORK ENVIRONMENT:**

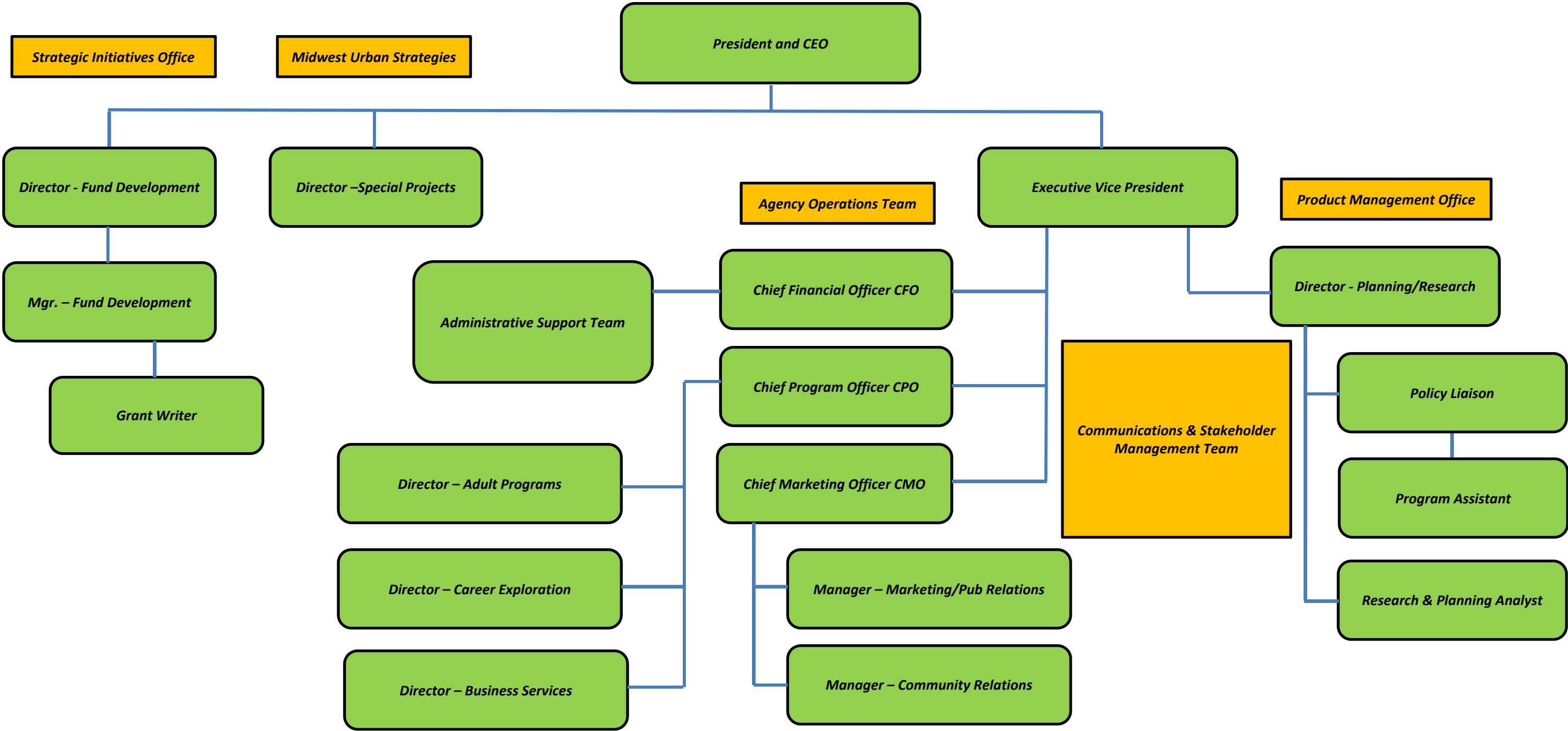
The noise level in the work environment is usually moderate. Weekly travel is required. Safety concerns exist where travel is required.

I have read/reviewed the job description for the position of Chief Executive Officer, acknowledge that all items are essential to the job, understand what the job demands, and agree that I am able to perform the essential functions of the job, with or without reasonable accommodation.

\_\_\_\_\_  
 (Chief Executive Officer)

\_\_\_\_ / \_\_\_\_ / \_\_\_\_  
 (Date)

Employ Milwaukee – Executive and Shared Services Leadership Team



*Milwaukee Area*  
**WORKFORCE**  
*INVESTMENT BOARD, INC.*



Milwaukee Area Workforce  
Investment Board, Inc.

# **COST ALLOCATION PLAN**

**UPDATED 7/1/2015**

## Overview

The purpose of this document is to describe the procedures under which the agency accounts for the costs of operating the organization and show compliance with 2 CFR Part 200, Uniform Administrative Guidance. This document specifically relates to the expense area of the organization.

The agency organizational chart and individual grant budgets are used to determine staffing cost pool assignments and which grants can be charged for services and related costs of a given cost objective. Cost assignments are intended to measure the relative benefit received by a specific grant and cost objective. Therefore, costs are allocated on an equitable distribution base such as but not limited to: customers served in a specific activity during a specific time period (participant counts), time directly allocated to a specific grant or cost objective (direct labor hours), dollars spent in a specific grant or activity, or time study or sampling for a specific period.

Some costs incurred benefit *specific* programs, while other benefit *all* programs. When invoices are first identified for payment, a judgment is made as to allowability to programs, allocability to programs, and budgetary availability. Once those determinations are made, the cost is identified as either direct to a program, allocable or as an indirect cost, using definitions detailed below. The expense is then entered into the accounting system, and the expense is paid.

### Allocation (200.4)

Allocation means the process of assigning a cost, or group of costs, to one or more cost objectives, in reasonable proportion to the benefit of the provided or other equitable relationship.

### Direct Costs (Part 200.413)

Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect. Costs will be directly charged to a funding source when possible.

### Allocable Costs (Part 200.405)

A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received. The standard is met if the cost:

- Is incurred specifically for the Federal award
- Benefits both the Federal award and other work of the MAWIB, and can be distributed in proportions that may be approximated using reasonable methods

- Necessary to the operation of the MAWIB.

When costs cannot be direct charged a cost pool and/or distribution method will be used:

- For any type of cost or grouping of similar costs not readily identified with a single funding source
- Ultimately allocated to funding sources in proportion to the relative benefit received
- Limited to shared direct and indirect costs
- Only actual, not budgeted, costs may be pooled
- All costs in the pool must be allowable costs for all the funding sources to which the pooled costs will subsequently be allocated

MAWIB fund accounting software utilizes distribution codes for allocable costs.

### **Basis of Allocations**

- **Participant Counts** - Allocation is based upon customers served in a specific activity during a specific time period. (E.g., HIRE Center distribution code which is updated quarterly. Allocation is based upon active participants in the program as of the date of the quarter.)
- **Direct Salaries** - Allocation is based on time and wages directly charged to a specific grant. Time studies may be used for employees for a specific period of time.
- **Direct Costs** - Allocation is based on dollars spent in a specific grant or activity. Use of direct costs will be used when calculating 10% indirect costs monthly.

MAWIB fund accounting software utilizes distribution codes for allocable costs. Allocated costs are distributed at the time of recording the expenditure upon the receipt of the invoice. Costs are allocated based on previous months Direct Salary Allocation. Allocated costs may include, but are not limited to facilities, IT department, office supplies and leased equipment.

### **Indirect Cost Pool – Use of 10 % De Minimis**

The Indirect Cost Pool will include all operational costs that were not readily identifiable in relational proportional benefits to individual grants or cost objectives through direct charging. In addition, the Indirect Cost Pool will also include those costs from the Administrative Staffing Costs that were not readily identifiable to grants.

At the end of the accounting period the 10% De Minimis indirect cost rate will be applied to all applicable grants. This ensures that the proper allowed amount of

the 10% De Minimis is charged to each fund to include the relational staffing costs. The 10% De Minimis will be charged based on the Modified Total Direct Costs of each grant. This base excludes all rent costs, capital expenditures, equipment, participant support costs, and the portion of each subaward in excess of \$25,000. Other items may be excluded as necessary to avoid a serious inequity in the distribution of costs with the approval of the cognizant agency. There are currently no such additional excluded costs for MAWIB.

The related amount for the application of the 10% De Minimis will be expensed to each grant/funding source through a journal entry debiting such grant and crediting the Indirect Cost Pool. Any remaining balance in the Indirect Cost Pool fund, whether over or under, will be cleared to a corporate account (Fund 983) at the end of the fiscal year.

The cost allocation plan is reviewed, at minimum, on an annual basis. More frequent reviews may occur when deemed necessary.

This cost allocation plan is effective July 1, 2015.



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Earl Buford, Chief Executive Officer  
The Milwaukee Area Workforce Investment Board, Inc.

August 31, 2015



Employ Milwaukee, Inc.

Fiscal Policies  
&  
Procedures Manual

Updated February 2017  
Board Approved March 8, 2017



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## General

### General Overview

Employ Milwaukee (EMPLOY MILWAUKEE) Board of Directors approves the financial and personnel policies and delegates the administration to the Chief Executive Officer, who oversees his staff in their application of these policies. Employ Milwaukee's Chief Financial Officer (CFO) in collaboration with the Chief Executive Officer and staff have the responsibility to maintain a financial management system, which provides for accurate, current, and complete disclosure of financial results in accordance with grant reporting requirements.

All EMPLOY MILWAUKEE staff is responsible to Employ Milwaukee Chief Executive Officer. All staff will follow the lines of authority on the organization chart. Employ Milwaukee Chief Executive Officer for all staff, indicating responsibilities for each position, will maintain current job descriptions.

Staff financial responsibilities are segregated where possible in order to ensure adequate Internal Control.

Fiscal control and accounting procedures must be in accordance with GAAP - generally accepted accounting principles.

All employees are required to take an annual vacation to provide for rotation of duties and to relieve the leave liability of the organization.

Separate accounts will be maintained as required by funding source regulations.

### Accounting Procedures

Employ Milwaukee utilizes Abila MIP Fund Accounting Program, an internal accounting system, for preparation of its General Ledger.

The CFO is responsible for supervising and coordinating the preparation of the financial reports. Reporting to the CFO are a Staff Accountant, an Contract and Fiscal Compliance Manager, a Accounting Manager, an Accounting & Payroll Clerk, Payroll Intern and two Staff Accountants.

Employ Milwaukee Fiscal Department follows the State of Wisconsin – Department of Workforce Development Program Guide – Administration of Workforce Programs Policy & Procedure manual, OMB Circulars A-110 and A-122. Effective December 26, 2014, grants awarded after this date will fall under the Uniform Grants Guidance (2 CFR200).

Financial statements are prepared on the accrual basis of accounting quarterly.

## Grants and Contracts

Original copies of all grants and contracts awarded to Employ Milwaukee will be immediately forwarded to Fiscal Department. The CFO will review each contract to insure compliance with all financial provisions.

## Fiscal Record Retention

The following records shall be retained for seven years after program closeout, or resolution of audit findings, whichever is longer, unless funding sources require longer.

- All records pertinent to each participant's enrollment including dates of entry and termination.
- All financial records and supporting documents.

## Whistleblower Policy

The purpose of this policy is to encourage all employees to disclose any wrongdoing that may adversely impact the Company, the Company's customers, employees or the public at large. This policy also sets forth an investigative process of reported acts of wrongdoing and retaliation and procedures for reports of questionable auditing, accounting and internal control matters from employees on a confidential and anonymous basis and from other interested third parties. This policy complies with the Sarbanes-Oxley Act of 2002 – Section 301.4 – concerning procedures for making complaints about accounting and auditing directly to the Personnel & Finance Committee of the Company's Board of Directors. The procedures facilitate access for employees and related parties to reach the Personnel & Finance Committee and/or the Director of Administration.

## Budgets and Reporting

### Budgets

Operating budgets and program budgets are prepared by the CFO.

Operating and program budgets are approved by the Chief Executive Officer and Employ Milwaukee Board of Directors.

On a quarterly basis, actual costs to budgeted amounts are reviewed by the CFO and Employ Milwaukee Board of Directors reviews the budget to actual comparison reports.

## Financial Reporting

### *Internal Reporting*

All balance sheet accounts are reconciled by Fiscal Staff and analyzed by the CFO. The statement of financial activities is reviewed by the CFO on a monthly basis and reviewed with the CEO and is distributed to Employ Milwaukee Board of Directors quarterly.

### *External Reporting*

The Staff Accountant, Staff Accountant and Contract and Fiscal Compliance Manager prepare closeouts for all grants and contracts, according to the requirements of grants and contracts. The Chief Financial Officer and Chief Executive Officer review and sign closeout packages.

The Staff Accountant, Staff Accountant(s), Contract and Fiscal Compliance Manager and Accounting Manager, as assigned, are responsible for properly billing the various sources and to ensure that all requirements are properly followed. Billings must correspond to the timeframes set forth in the various contracts/grants. The CFO reviews all billings prior to submission.

Billings are prepared according to the requirements of the contract/grants. It is the responsibility of the Contract and Fiscal Compliance Manager and/or CFO to obtain the necessary billing forms or develop proper billing forms. CFO will establish all receivables at year-end.

## IRS Reporting

It is the responsibility of the CFO to ensure that proper IRS reporting requirements are followed. IRS reports that must be filed, but are not limited to, employee W-2's, W-3, 941's, 1099's and the 990 forms. The Accounting Manager prepares the W-2's and 941's. Depending on the complexity of the report, Employ Milwaukee may purchase professional services in completing the forms. Reports must be filed on a timely basis or extensions must be obtained from the IRS.

## Cash Management

### General Policies of Cash Management

In accordance with 2 CFR 200.305(b) Employ Milwaukee exercises draw and payment processes which mitigate the possibility of excessive time lapses between receipt of funds and disbursement.

Employ Milwaukee receives both cost reimbursement grants and those that allow for advance funds. For those that require drawdowns of advance Federal funds, draws will be made in accordance with the following guidelines and the procedures defined throughout this Cash Management section:

- Drawdown of funds will be made as close as possible to actual expenditure of funds.
- Monitoring of the fiscal activity (drawdowns and payments) under each grant will be completed on a continuous basis.
- Cash flow of each grant project will be carefully reviewed before each drawdown by both the Accounting Manager and the CFO.
- Due care will be exercised to ensure that funds will not be drawn in advance of actual expenditures or encumbrances known to be due more than one week post receipt of drawn funds.

### Cash Request

Cash is monitored by the CFO weekly to make sure there are no cash deficiencies or excess cash on hand.

The Staff Accountant initiates State of WI, US DOL and US DHHS requests.

When preparing a cash request the following steps are taken to avoid receipt of excess cash:

1. The amount of cash on hand by fund is calculated.
2. Cash needs for the next ten days are determined by reviewing accounts payable, estimated payroll and other estimated costs.
3. The difference between what is needed and what is on hand is the minimum amount of cash needed.

Cash requests are reviewed and approved by Contract and Fiscal Compliance Manager and/or CFO prior to submission to funding source.

### Cash Receipts

All checks will be received by the Executive Assistant II. The Executive Assistant II logs in all cash receipts in the Cash Receipts Summary with the following information: check number, date of check, source of check, amount and date of check deposited. The Executive Assistant II makes two copies of the checks.

The checks are immediately forwarded to the Staff Accountant. The checks are electronically deposited in an FDIC insured bank and are electronically endorsed as

being For Deposit Only. Upon confirmation of deposit, the check is stamped as being electronically deposited by the Staff Accountant. The Staff Accountant creates a cash receipts entry. The Staff Accountant will enter the cash receipts entry. The entry is reviewed by the Accounting Manager.

State of Wisconsin (DWD and DHS) and federal grants process funds electronically. The Staff Accountant prepares the cash receipts entry after the weekly WIA cash request. The Staff Accountant enters the Cash Receipts. The Contract and Fiscal Compliance Manager confirms the deposit at the Bank weekly prior to the Staff Accountant submitting the cash receipts entry for review by the Chief Financial Officer.

At all times the cash on hand will be maintained at the lowest amount for the needs of the organization.

## Cash Disbursements

### *Accounts Payable*

See Section on Purchasing

### *Payroll*

EMPLOY MILWAUKEE employees will submit their timesheet electronically. The supervisor will approve the timesheet electronically, with the exception of the CEO. The Accounting Manager will review the timesheets and transfer them into the Abila MIP Fund Accounting Payroll program. Employees participating in the subsidized employment program will submit a paper timesheet to their supervisor. The supervisor will sign it and submit it to the responsible EMPLOY MILWAUKEE employee to review and initial. That employee will submit the timesheet to the Fiscal Department. See Section IV Payroll for detailed procedures.

### *Check Signing*

Authorized check signers includes Chief Executive Officer, Chief Operating Officer, Board Treasurer and Board Chair.

<\$25,000 will be signed by one authorized signature.  
≥\$25,000 will be signed by two authorized signatures.

Electronic signatures will be acceptable for Chief Executive Officer.

Fiscal Department will maintain check registers approved by the CEO and CFO with a summary log of check dates and check numbers.

### *Check Distribution*



Payroll checks will be distributed to employees only on day of payroll.

Payroll direct deposit will be in employees account in the A.M. on day of payroll.  
Accounts Payable checks will be issued weekly.

### Petty Cash

The Fiscal Department will maintain a \$200.00 petty cash fund. Reimbursements will be given for purchases <\$25.00 only when proper documentation is furnished (i.e. a receipt of purchase). The Staff Accountant disbursing funds is responsible for recording cash disbursement entries daily. The Staff Accountant will reconcile Petty Cash fund monthly. An accounts payable check or cash deposit will be made monthly to maintain a \$200.00 balance. The Accounting Manager will review and approve documentation monthly.

### Bank Reconciliations

The Staff Accountant is responsible for reconciling the Payroll. The Accounting & Payroll Clerk is responsible for reconciling the Operating Checking Account.

Bank statements are printed by the responsible fiscal person each month. The internal accounting system is used to reconcile the bank balance to the general ledger balance. Each responsible fiscal person will sign the bank reconciliation report once completed.

The CFO reviews the bank reconciliations monthly and signs off on it.

### Stale Check Policy

Between July 1st and September 1st, Employ Milwaukee will send out “Due Diligence” letters to Vendors/Payees with outstanding checks over \$50. If no response is received by the deadline, Employ Milwaukee will electronically report and turn over the monies to the state. If a check is negotiated that was previously remitted to the State, Employ Milwaukee will file for reimbursement from the State.

Employ Milwaukee will follow this schedule:

#### Payroll

<u>Date of Process</u>	<u>Check Dates Covered</u>
7/1/13 – 9/1/13	7/1/11 to 6/30/12
7/1/14 – 9/1/14	7/1/12 to 6/30/13
7/1/15 – 9/1/15	7/1/13 to 6/30/14
7/1/16 – 9/1/15	7/1/14 to 6/30/15

#### Accounting

<u>Date of Process</u>	<u>Check Dates Covered</u>
7/1/14 – 9/1/14	7/1/08 to 6/30/09
7/1/15 – 9/1/15	7/1/09 to 6/30/10
7/1/16 – 9/1/16	7/1/10 to 6/30/11
7/1/17 – 9/1/17	7/1/11 to 6/30/12

## Non-Government Revenue

Monthly interest from the operating accounts earned on non-governmental monies and private donations will be recorded in the general ledger as non-government revenue as defined by the funding source.

Expenses will be recorded through the Accounts Payable module to reflect non-government expenses.

## Program Income

Program income is defined as income received by the recipient or sub-recipient directly generated by a grant or sub-grant supported activity. Program income is subject to the guidelines of the funding source. Program income includes:

- Income from fees for services performed.
- Income from the use or rental of real or personal property acquired with grant or sub-grant funds.
- Income from the sale of commodities for items fabricated under a grant or sub-grant.
- Revenues earned by a governmental or private non-profit service provider that are in excess of the actual cost.
- Interest income earned on advances of sub-grant funds.

Program income must be used prior to the submission of the final report for the funding period of the program year to which the earnings are attributable.

Interest income earned on non-governmental funds is not considered program income.

## Debts & Debt Collection

Debt collection activity will be progressive, from notification of the debt through debt collection steps. Debts due to the agency may arise from a number of sources including, but not limited to the following:

- Audit findings
- Complaint and appeal ruling
- Report of an investigation

- Contract closeout report
- Monitoring report
- Duplicate payment

Upon determination on a debt the agency will notify the debtor and attempt to get repayment. Options for repayment may include:

- Immediate cash repayment
- Non-cash repayment
- Offset of future payments
- Negotiate a repayment schedule

When a debt is outstanding and not being repaid, further collection efforts will include dunning letters and, if the debt is significant, ultimately turning the account over to a debt collection agency.

- 1) 30 Day late notice – Verify the debt amount and non-payment and schedule repayment or negotiate a repayment plan.
- 2) 60 Day late notice – Discussion of repayment schedule, and consequences on non-payment, such as small claims court or referral to a collection agency.
- 3) 90 Day late notice – Notice that debt will be forwarded to small claims court or referral to a collection agency.

If the debt remains uncollectable, all documentation supporting how the debt was incurred, and all steps taken to recover the amount needs to be gathered and submitted to the DWD program manager with a letter requesting waiver of the debt. DWD and DOL will determine if the waiver will be granted or if the debt will remain with the local area.

## Payroll

### Employee Compensation (2 CFR 200.430)

#### **Policy**

Employ Milwaukee has created compensation procedures to meet the requirements within 2 CFR 200.430. In accordance with these requirements, compensation of Employ Milwaukee employees conforms to the definition of *Reasonableness* as defined in 2 CFR 200.430(b) and is applied consistently companywide per the procedures as described within this section.

#### **Procedure**

Employ Milwaukee follows an employee salary schedule developed by The Management Association (MRA) and maintains a membership with MRA for the purposes of reviewing salary scales and completing salary surveys.

The Accounting Manager maintains and updates the salary schedule on an as needed basis and adjustments are approved by the CEO.

### **EMPLOY MILWAUKEE Employee Payroll**

All employees will submit a timesheet for a two-week period electronically to their supervisor by the Monday morning of payroll week. The supervisor reviews it, approves it, and submits it to the Fiscal Department. The Accounting Manager will review the timesheets and transfer them into the Abila MIP Fund Accounting Payroll Program. The Accounting Manager will be responsible for compiling the payroll information on a worksheet to reconcile to the Payroll program. The Contract and Fiscal Compliance Manager will review payroll checking for any changes to the master record.

The employee's supervisor must approve all time off during the period. Timesheets should be coded by funding source and for appropriate time (vacation, sick, etc.). The Accounting Manager makes any changes necessary to the master control such as address, rates, status, etc. The CFO approves any changes to rate of pay. Copies of these changes are filed by the Accounting & Payroll Clerk in the employees' files. Worksheets are cross referenced with the Abila MIP Fund Accounting Payroll Program report to check for accuracy.

By end of business Wednesday the direct deposit amounts are sent via Internet to the bank. The payroll checks for Employ Milwaukee employees are put into envelopes and held by the Fiscal Department until the employee signs for their check that Friday.

The payroll transactions are transferred to the Abila MIP Accounting Program by the Accounting Manager. The CFO approves the coding prior to posting. Payroll related deductions and payroll tax payments are entered into the Abila MIP Fund Accounting Program. Reports are created and printed as backup for these deductions. The CFO reviews all payroll deductions.

### **Subsidized Payroll**

All participants will fill out a timesheet for a two-week period and turn it in to their supervisors on the Friday afternoon of the pay period ending week. The supervisor reviews the timesheets, signs it and submits it to the Contract Monitor for payroll processing. The Contract Monitor and a fiscal staff person review timesheets for accuracy and completeness and initial it.

The Accounting & Payroll Clerk and/or Payroll Intern collect all timesheets and enters the hours into Excel. The Accounting Manager enters the hours into the Abila MIP Fund Accounting Payroll Program. The Accounting & Payroll Clerk and/or Accounting Manager also make any changes necessary to the master control such as address, rates, etc. which was obtained from the Contract Monitor. Copies of these changes are documented in ETO and filed by the Contract Monitor in the participant files.

The payroll checks for the participants will be put into envelopes by the Accounting & Payroll Clerk and/or Payroll Intern. The checks are distributed and the payroll reports are filed by pay period. Checks will be distributed by the Accounting & Payroll Clerk to the Contract Monitor, who signs a register recording the receipt of payroll checks. The Contract Monitors will distribute payroll checks to participants upon them signing a register for receipt of check. The Fiscal Department will maintain this signature register.

The Accounting Manager will transfer and post payroll transactions. Accounting & Payroll Clerk will upload positive pay to the bank.

### **Mileage Reimbursement**

Employees receive mileage reimbursement for actual miles traveled in the course of business. Miles are recorded in the Microix system along with the hours worked. The supervisor approves the mileage reimbursement when they approve the timesheet. The Accounting Manager will review the information and check their insurance status. The reimbursement is given along with their regular pay.

All employees using a privately owned vehicle must maintain limits of liability of at least \$100,000/300,000/50,000 and must provide proof of the same to the Accounting & Payroll Clerk.

## Cell Phone Policy

Employ Milwaukee will pay for the usage of cell phones for employees that have a need for one. Employees that are issued a standard phone will have a \$5.00 a paycheck deduction to help subsidize the cost of the phone. The employee will also be responsible for any charges over \$50.00. Employees that are issued a smart phone will have a \$10.00 a paycheck deduction to help subsidize the cost of the phone. The employee will also be responsible for any charges over \$85.00. Employees have the option to add additional plans to their line if they agree to a payroll deduction to cover the costs. Each employee signs an agreement to these deductions when they receive their phone.

## Travel

All travel expenditures must be specifically authorized in advance via the Travel Approval Form. All travel is subject to availability of funds.

## Conferences and Registration Fees

Conferences and registration fees are allowable costs subject to prior authorization of supervising Managers, Directors and Vice Presidents. Authorized requests for fees are due at least 15 working days before the fee is due, and must include a photocopy of any original documents that will be sent with the payment. The Fiscal Department will issue a check and mail it with the registration forms a week before it is due. If credit card payment is the only form of payment that is accepted, the authorized request must be submitted to the Executive Assistant II for Program Staff and to the Junior Advisor for Administrative Staff for payment.

## Lodging Expenses

Reasonable lodging expenses are an allowable cost subject to the specific rules of the funding source. For hotel accommodations, the employee must attach information regarding the hotel to the purchase order (including hotel phone number, address, and arrival/departure dates). The Executive Assistant II for Program Staff and the Junior Advisor for Administrative Staff will book and pay for hotel room and email the employee the confirmation number. All lodging expenses must be substantiated with an original receipt from the lodging establishment. The receipt needs to provide sufficient detail for Employ Milwaukee to determine the cost of the room and any other charges included in the bill. The receipt must be submitted to Fiscal Department upon return to office.

## Commercial Transportation - Plane, Train, etc.

Commercial transportation expense is an allowable cost subject to the specific rules and regulations of the funding source. All EMPLOY MILWAUKEE travel should be procured at the lowest coach or tourist class services available that meets the specific needs of the traveler. First or business class rail or air service is not an allowable cost. For all travel arrangements the date of departure/return and location (city, state) must be indicated on the purchase order. The employee should search for a flight/trip online that best fits the travel plans and attach the information to the purchase order. The Executive Assistant II or Junior Advisor will try and locate the flight. The Executive Assistant II and/or Junior Advisor with the CFO will use their judgment on the cost of the flights according to the availability of funds. The Executive Assistant II and Junior Advisor needs at least two weeks prior notice when making transportation accommodations. All receipts must be submitted to Fiscal Department upon return to office.

## Meals

Meals while on out-of-town travel (outside a 50-mile radius of traveler's normal place of business) are allowable costs subject to the specific rules and regulations of the funding source. The traveler can either be reimbursed for the actual meal expenses, if reasonable and documented by a receipt, or can be reimbursed for meal expenses using the U.S. General Services Administration per diem rate for overnight travel. The per diem rate is adjusted for partial travel days and for meals provided.

For purposes of these policies, travel begins one hour before the scheduled departure of a plane or train, or if driving, the actual time of departure. The travel status ends, for the purpose of meal reimbursements, one hour after the plane or train returns the traveler to his/her home base. Travel by automobile ends upon arrival at the traveler's workplace or residence.

For partial days travel, the following guidelines will be used to determine the appropriate meal per diem. Employ Milwaukee follows the Federal Code for determining per diem rates. The rates can be found at [www.gsa.gov](http://www.gsa.gov). Travel days (for meal per diem purposes) begin at 12:01 A.M. and end at midnight. Each day is further broken up into quarters (12:00 A.M. to 6:00 A.M., 6:00 A.M. to 12:00 P.M., and 12:00 P.M. to 6:00 P.M. portions of the day).

Effective March 23, 2009 and thereafter: partial days travel will be reimbursed 75% of per diem for the first and last day and 100% for full days.

When on travel status, staff may use the per diem rate for meals, or be reimbursed for actual cost. Only one system may be used for the entire trip. Staff will only be reimbursed up to the amount of the receipts presented on the travel reimbursement. No per diem rates will be used if receipts are turned in for actual reimbursement. Actual reimbursements cannot exceed per diem rate. Employ Milwaukee will reimburse per diem meal expenses at the daily rate specified for the city travel destination.

## Automobile Expense

Employ Milwaukee will reimburse the traveler for actual miles traveled in one's personal automobile provided that:

1. the travel is an allowable cost, subject to the specific rules and regulations of the funding source, and
2. actual cost does not exceed the lowest tourist or coach commercial air fare.

Employ Milwaukee uses the reimbursement rate set by the IRS.

## Travel Advance

The Staff Accountant will complete a check request for the per diem amount for trips. The CFO will review and approve the calculations and sign the check request. The Staff Accountant will attach supporting documentation regarding the purpose and length of trip.

**ALL REQUESTS SUBMITTED MUST HAVE SUPPORTING DOCUMENTATION ATTACHED TO EVERY PURCHASE APPROVAL REQUEST FORM.**

## Procurement Standards

### GENERAL PROCURMENT POLICIES (2 CFR 200.318)

Employ Milwaukee has documented its procurement procedures below, within this Procurement Standards section, to meet the mandates of Federal laws and standards identified in 2 CFR parts 200.317 through 200.326

Employ Milwaukee will maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Employ Milwaukee's Conflict of Interest Policy provides standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real, perceived or potential conflict of interest. Conflicts of interest must be disclosed in writing when known in advance or announced to the voting body. The party must excuse themselves from any further discussion and/or vote on the matter in question. Violations of such standards are subject to disciplinary actions provided in Employ Milwaukee's Conflict of Interest Policy.



### COMPETITION (2 CFR 200.319)

All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards provided in section 200.319 of 2 CFR 200. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work or invitations for bids or requests for proposals must be excluded from competing for such procurements.

Employ Milwaukee procurement transactions will contain no requirements that unduly restrict competition as specified in 200.319(a),(b), and (c).

Employ Milwaukee procurement procedures will ensure that all solicitations:

- a. Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured in a manner that does not unduly restrict competition; and
- b. Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

### REQUIREMENTS FOR PROPOSALS (2 CFR 200.319(c)(2))

Clear and precise Requests for Proposals (RFP) shall be prepared to ensure reasonably priced and competitive responses. All legal and administrative restrictions, requirements and options must be included in the RFP. The RFP must also include an equitable rating process.

A cost and/or price analysis shall be performed in connection with each procurement action, including contract modifications. Costs which appear excessive or insufficient can be modified during the contract negotiation process. Types of acceptable cost or price analysis include:

1. Projected costs -  
all prospective contractors will be required to submit a line item budget.
2. Historical costs -  
comparison of line item costs with previous contracts for the same services.
3. Market price -  
comparison of costs with other proposals for the same services.
4. Performance Standard application -  
compare to the standard cost per entered employment to contract price.
5. Risk of Loss -  
Documentation for indicators of predictable obstacles in achieving results due to certain conditions.

Cost analysis may be excluded in the following situations: the price

1. is based on adequate price competition.
2. is based on established catalog or market prices.
3. is set by law or regulation.

Rating review forms shall be completed for each proposal. The selection process may include:

1. Cost/price analysis
2. Effectiveness of proposer in delivering services based on demonstrated performance
3. Quality of training
4. Characteristics of participants
5. Provision of supportive services
6. Fiscal accountability
7. Determination of the ability of the service provider to meet the program specifications
8. Performance goals
9. Consideration of CBO's including women's organizations with experience in non-traditional training for women
10. Effectiveness of alternative educational services.

Contract proposals must include contractor certification that the data is accurate, complete, and current at the time of its submission, and in compliance with the contractors own procurement procedures. Contracts and modifications negotiated in reliance on such data shall provide for the right to a price adjustment because of submitted data that was not accurate, complete and current as certified. Contractors shall be required to submit a Debarment and Suspension certification, Disclosure of Lobbying Activities certificate.

Contracts, both original and modified, shall be monitored during the award period to ensure compliance with the terms of the contract. Monitoring documents shall include fiscal and program reviews.

Organizations receiving a contract or modification must maintain books and records that relate to such cost and pricing data for three years from the date of final payment. In addition, each contractor must submit an annual, organization-wide financial and compliance audit performed by a qualified independent auditor in accordance with generally accepted auditing standards and Uniform Guidance 2 CFR § 200 Subpart F – Audit Requirements; as applicable (see Contractor Audit Reports).

## METHODS OF PROCUREMENT (2 CFR 200.320)

### Methods of Procurement

- Micro Purchase
- Small Purchase
- Sealed Bids

- Competitive Proposals
- Non-Competitive Proposals

#### Micro Purchase

- Acquisition of supplies or services not exceeding \$3,000 in the aggregate
- May be awarded without soliciting competitive quotations if price is reasonable
- Distribute equitably among qualified suppliers to extent practicable

#### Small Purchase

- Informal procurement methods for securing services, supplies or other property
- Cost is less than the Simplified Acquisition Threshold – Currently \$150,000 set by the FAR (Federal Acquisition Regulation) at 48 CFR 2.1
- Price or rate quotations must be obtained from an adequate number of qualified sources

#### Sealed Bids

- Bids publicly solicited
- Firm fixed price contract is awarded
- Successful bid conforms to all material terms and conditions of the invitation for bids and is lowest price

#### Competitive Proposals

- Publicize RFP and identify all evaluation factors
- Proposals must be solicited from an adequate number of qualified sources
- Written method for evaluating and selecting proposals
- Contracts will be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

#### Procurement by Noncompetitive Proposals

This form of procurement may only be used when one or more of the following apply:

- Item/service is available only from a single source
- Public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation
- After a solicitation of a number of sources, competition is determined inadequate
- Awarding agency authorizes noncompetitive proposal in response to a written request

#### Competitive procurement of subrecipients is required when:

- Selecting subrecipients on a competitive basis
- When required by statute (e.g. WIA/WIOA Youth Programs)
- When required by the Funding Opportunity Announcement (FOA) and/or grant terms and conditions.

#### Preferred Provider List (PPLs)

Every three (3) years, Employ Milwaukee, undergoes the competitive proposal process for its WIOA One-Stop, Adult, Dislocated, and Youth programs partners. These providers undergo an extensive review which include continuous review post award.

In an effort to reduce unnecessary labor, Employ Milwaukee, places the awarded providers on a Preferred Provider List (PPL). These providers may then be selected for additional grant work efforts, with fixed contract rates less than the Simplified Acquisition Threshold of \$150,000.00, without re-applying via the release of a public notice RFP. These work efforts may include, but are not limited to, DOL –ETA grants, EPA, DHHS, DHS, and DWD grants.

PPL's will be required to submit informal proposals for any post WIOA awards for consideration by the Executive team related to additional non-WIOA work efforts. Negotiations for work efforts may be completed verbally or via email but will always result in a signed contractual agreement. MOU's will not be binding.

Approved providers will remain on the PPL for a maximum term of three (3) years. If a selected provider is released from their WIOA contract for any reason related to contract negligence, they will be removed from the list. All providers must re-apply at the end of their current WIOA contract term.

## Purchasing

All purchases and procurement activities are governed by 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

## Accounts Payable

All purchases of services or goods require prior approval. Purchase Approval Request Forms will be issued for all requisition of goods and services.

- Purchase Approval Requests <\$3,000 require the appropriate Vice President and CFO signature.
- Purchase Approval Requests  $\geq$ \$3,000 requires the appropriate Vice President, CFO and Chief Executive Officer signatures.
- Contracts (which include contractors and sub grantees) require a separate approval process requiring the review and approval of Program Director, Vice President and CFO prior to signature by Chief Executive Officer.
- A pre-numbered purchase order is prepared by the Staff Accountant and a copy is provided to the requestor.
- Reoccurring administrative invoices do not require Purchase Orders.

Purchases to be made through the use of grant funds are subject to the rules and regulations established by the appropriate funding source.

Purchases that are less than \$3,000 are considered micro-purchases, as set forth in 2 CFR Part 200, § 200.67. Micro-purchases is defined as a purchase of supplies or services using simplified acquisition procedures. Such purchases may be awarded without soliciting competitive quotations as EMPLOY MILWAUKEE sees reasonable. Micro purchases need not follow small purchase procedures as listed below.

Purchases that are \$3,000 or more and less than \$150,000 (Simplified Acquisition Threshold) are considered small purchases as set for in 2 CFR Part 200, § 200.320, and will follow small purchases procedures including obtaining rate quotations, performing a cost price analysis, lease versus purchases analysis (when applicable). Awarding criteria for accepting a quote for a small purchase may include, but is not limited to:

- Supplier/Contractor ability to meet specifications
- Supplier/Contractor ability to provide adequate service and/or equipment supplies
- Supplier/Contractor is a small or minority business, women's business enterprise, or labor surplus firm
- Supplier/Contractor past history (if applicable) of service and reliability

Information must be made available to the CEO for approval of the purchase.

EMPLOY MILWAUKEE authorized personnel approve training, intensive and supportive services that are vouchered by Case Managers. These vouchers do not require additional approval by Vice President, CFO or CEO. See Section VI Vouchers for detailed procedures.

Managers can authorize individuals to be his/her designee for signature and approval. This is done by preparing a written statement noting who the designated individual is and for what period of time the manager is authorizing the individual to be his/her designee.

Original PO's are maintained by the Staff Accountant. Once fully paid or partially paid and liquidated they are attached to the final invoice.

All invoices for operating costs are received by the Staff Accountant for review and to match purchase orders to the invoices. Amount in excess of the PO requires approval by the CFO. All invoices for operating costs require CFO signature. Reoccurring administrative invoices in excess of \$3,000 require CEO approval. Checks in excess of \$3,000 with multiple invoices require CEO approval for each invoice.

Checks are processed weekly. The Contract and Fiscal Compliance Manager and/or CFO approve the check selection for processing after reviewing the preliminary cash

requirement report. The Chief Executive Officer is the designated signatory on all checks. Dual signatures are required on checks over \$25,000.

Voided checks will have “VOID” boldly written in ink across the check or stamped. The original of a voided check will be filed. The Staff Accountant will assure that proper entries are made to reflect any voided checks.

In no event will checks:

- Be used in other than chronological order
- Be prepared or signed in advance
- Be made out to “cash” or “bearer”, etc.
- Be prepared on verbal authorization.

### Contractor Accounts Payable

The Staff Accountant is responsible for the review of contractor’s benchmarks and payment of contractor’s A/P.

### Voucher System – Training, Intensive and Supportive Services

Program participants can either make purchases and be reimbursed by EMPLOY MILWAUKEE or the vendors can directly bill EMPLOY MILWAUKEE.

The case managers are responsible for completing and maintaining the required procedures for EMPLOY MILWAUKEE programs (i.e. I.S.S. use, related forms, assessment of needs, etc.). In addition, it is their responsibility to ensure that the expenditures are supported by the information and goals in the Individual Service Strategy. Based on this work the case managers prepare pre-numbered vouchers for participants in ETO (travel, tuition, supplies, day care) and are forwarded to the Authorized EMPLOY MILWAUKEE program staff person for preliminary approval. The Accounting Manager gives final approval for all vouchers.

The Staff Accountant is responsible for coding and reviewing all participant Vouchers. The Staff Accountant enters the vouchers as encumbrances in Abila MIP.

Vouchers for reimbursement to program participants are processed for payment. Reimbursement vouchers are also encumbered before entry into AP. Vouchers for vendors are encumbered in the accounting system. When invoices are received they are approved by the Staff Accountant to verify that services and required benchmarks have been met prior to processing for payment.

### On-the-Job-Training Accounts Payable

Prior to entering into any on-the-job training (OJT) contract, staff must follow the OJT Guidelines.

The Contract and Fiscal Compliance Manager receives the employer contract and reviews the budgeted hours, the reimbursement data, and contract terms and obtains the proper signatures. The Business Services Department reviews the contract before it goes out for employer signature and the CEO signs it upon return from the employer. The Staff Accountant encumbers the contract once the voucher is received by Fiscal into the accounting system.

Invoices are completed by employers and returned to Employ Milwaukee for payment. The Business Services staff person approves the invoice before fiscal review. The Staff Accountant reviews the invoice for signatures, contract date, cost limits, mathematical accuracy, overtime hours and other financial data. The Staff Accountant assures that the invoice amounts do not exceed contract limits and processes it for payment. Final payment will be made when staff indicates that contract requirements, including the training outline, are satisfactorily met.

### Supplies Purchases

1. Supplies are defined as all expendable property with a unit cost of \$5,000 or less, and with a useful life of less than one year.
2. Supplies will be procured according to the organization's procurement procedures.

### Equipment Purchases

Equipment purchases are made following the Grantor Procurement Standards.

1. Equipment is defined as non-expendable property with a unit cost of \$5,000 or more, and a useful life greater than one year.
2. Purchases of equipment with a unit cost of \$5,000 or greater must be approved by the Chief Executive Officer of Employ Milwaukee. Effective July 1, 2004 equipment with a unit cost of \$5,000 or greater must be allocated among active funding sources. If the equipment is for a specific DWD/DOL program use the equipment must be purchased with corporate dollars and depreciated over the useful life of active funding sources. The purchaser must obtain prices from 3 vendors, if possible. Formal, written bids are not required, but the specifications and the prices quoted must be documented by the purchaser. The request should contain this information:

- a. The type of equipment needed and the reason for the purchase. Include the proposed location and the name of the program in which the equipment is to be used.
- b. The names of the vendors from which prices were received, the specifications provided by the vendor, and the prices quoted.
- c. If three price quotations were not received, state the reason(s) why.
- d. Recommendation of a purchaser, and the reason why that recommendation is being made.

When the request is approved by the CFO and Chief Executive Officer of Employ Milwaukee, he/she will initial a photocopy of the request, and send the photocopy to the purchaser.

4. Approved equipment purchases will be processed for payment according to Employ Milwaukee cash disbursement procedures.

If the purchase is made utilizing the state schedule of purchases, this may be done without bid or quote according to DWD/DES policy. In addition, EMPLOY MILWAUKEE purchases will be allowable without bid or quote should a local vendor offer a price which is at or below the state schedule price (which has already been bid) and which can then be considered to be a “low bid” price for that purchase.

### Equipment Inventory and Disposal

EMPLOY MILWAUKEE will adequately safeguard all property. EMPLOY MILWAUKEE will maintain a register of equipment costing at least \$5,000 showing the following:

1. Description of the property;
2. Serial Number/model number;
3. Inventory Tag/identification number;
4. Date received;
5. Acquisition source;
6. Unit acquisition cost;
7. Award number purchased under;
8. Location of the property;
9. Condition of the property;
10. Percentage of federal cost;
11. Whether title vest in grantee or Federal Government; and
12. Ultimate disposition data including date and sales price.



EMPLOY MILWAUKEE IT Department will conduct an annual physical inventory every December and provide CFO a copy of inventory records.

*Unit acquisition cost of \$5,000 or more*

Prior DWD/DOL approval is required for the disposition of equipment with a unit acquisition cost of \$5,000 or more. This includes property that was purchased with DWD/DOL funds or transferred from other programs. These requirements apply to such property whenever Employ Milwaukee discontinues operation of a DWD/DOL program, has no further use for the property or needs to dispose of unusable property. Before the property is disposed, EMPLOY MILWAUKEE must comply with the following requirements:

- EMPLOY MILWAUKEE must be sure that all relevant records are up to date.
- EMPLOY MILWAUKEE must submit the following information in writing to the appropriate DWD/DOL program manager for all property to be disposed of: the description, the acquisition source, the unit acquisition cost, the quantity, the condition, the funding source under which it was acquired, the reason for disposition, and the proposed disposition (include what will be done with any money resulting from disposition).
- Written authorization from DWD must be obtained.

The sale of equipment that is no longer needed shall be an action of last resort. Before a sale is made, the grantee shall take the following steps, which are listed in priority ranking:

- Transfer the equipment to other DWD/DOL funded programs of the grantee.
- Transfer the equipment to similar DWD/DOL funded programs of other grantees within the state. In transferring equipment to similar programs, EMPLOY MILWAUKEE should first offer the equipment to other WDAs, then to non-WDA grantees within the WDA.

Where property was purchased only partly out of DWD/DOL funds and the unit acquisition cost of the equipment was \$5,000 or more, the same disposition standards will apply. The amount of reimbursement to DWD/DOL shall be computed by applying the sales proceeds with the percentage of DWD/DOL funding in the original costs.

*Unit acquisition cost of less than \$5,000*

The provisions for the disposition of property with a unit acquisition cost of less than \$5,000 are as follows.

Prior approval from DWD/DOL is not required.

The sale of such equipment that is no longer needed shall be an action of last resort.

Before such sale is made, Employ Milwaukee shall take the following steps that are listed in priority ranking:

- Transfer the equipment to other DWD/DOL funded programs within the WDA;
- Transfer the equipment to other DWD/DOL funded programs in other WDAs within the state; or
- If no such program is found, the equipment may be for sale.

#### Proceeds from Disposition of DWD/DOL-Funded Property

Funds received the sale of any DWD/DOL funded property are program income and shall be subject to the requirements of program income.

The disposition of all property and property transferred from other programs must be fully documented.

When technology assets have reached the end of their useful life they should be sent to the Information Technology department for proper disposal.

Information Technology will securely erase all storage mediums in accordance with current industry best practices. Equipment which is working, but reached the end of its useful life to EMPLOY MILWAUKEE, will be donated. A lottery system will be used to determine who has the opportunity to receive available equipment. All equipment donations must go through the lottery process. This ensures that all recipients have an equal chance of obtaining equipment. All donations are final. No software, warranty or support will be provided with any donated equipment. Any equipment not in working order or remaining from the lottery process will be disposed of according to current environmental guidelines. Information Technology has contracted with several organizations to properly dispose of outdated technology assets. Prior to leaving Employ Milwaukee premises, all equipment must be removed from the Fiscal Department Information Technology inventory system.

#### Request for Advance – Special Events

Request for a special event advance will be allowed for EMPLOY MILWAUKEE authorized events. Employees must submit a check request two weeks prior to the scheduled event. Upon the completion of the event, the employee must submit all receipts to the Staff Accountant. Any monies remaining will be added to petty cash. Any monies owed to the employee will be issued through Accounts Payable or petty cash if < \$25.

## Debit & Credit Card Purchases

The CEO, CFO, Vice President of Planning & Grant Compliance, IT Manager, Facilities & Office Manager, and Executive Assistant II will have use of Corporate Credit Cards. Designated employees will have use of credit for store accounts. These cards and store accounts are only to be used when a check is not feasible. The requestor is to submit a Purchase Approval Form to the Staff Accountant with the necessary signatures. The requestor will submit adequate back up for the purchase including confirmation documentation and receipts.

The Contract and Fiscal Compliance Manager will reconcile the statements monthly. CFO and CEO approves all statements.

## Leverage & Match Policy

Employ Milwaukee (EMPLOY MILWAUKEE) receives grant awards that may require federal leverage and non-federal match per grant agreement. When EMPLOY MILWAUKEE subcontracts with other organizations, the sub agreement will include the amount of leverage and match required for the project on the front page. Guidance on collecting and reporting leverage and match will appear as an attachment. EMPLOY MILWAUKEE will require monthly reporting of leverage and match expenditures along with the monthly financial report for the program. EMPLOY MILWAUKEE will track leverage and match on an excel spreadsheet as necessary for grantor reporting.

### Leverage and Match Guidance

All contributions, including cash and third party-in-kind, shall be reviewed as part of the subrecipient's leverage and match when such contributions meet the following criteria:

- Are verifiable from the subrecipient's records
- Are necessary for proper and efficient accomplishment of project and program objectives
- Are reasonable (i.e. what a prudent person would do under the circumstances prevailing at the time the decision was made to incur the cost)
- Are allowable under the applicable federal cost principles
- Match - Are not currently or previously funded by the federal government under another award
- If provided by a third party (not the funded entity) is documented on letterhead by the third party
- Take place between the start and end dates of the project. Leverage and Match must be accrued within the project period concurrently.

In-kind (non-personnel) services shall be valued at the usual rate the entity charges for performing like services. Documentation of the rate claimed or actual costs, as applicable must be provided.

The subrecipient must collect support for leverage and match contributions to the same level of detail as required for reimbursed expenses. Documentation supporting in-kind rates/values and use, if applicable, must be collected and provided to EMPLOY MILWAUKEE when leverage and match is claimed. Staff Accountant may request documentation monthly or may review during Staff Accountanting.

## General Principles Affecting Allowability of Costs

### Cost Allowability Guidelines

Cost allowability guidelines are stated in 2 CFR 200, Subpart E Basic Considerations. To be allowable, grantee costs must meet the following criteria:

1. Necessary and Reasonable. Be necessary and reasonable for proper and efficient administration of the grant programs, be allocable thereto under these principles and, except as specifically provided herein, not be a general expense required to carry out the overall responsibilities of the grantee;
2. Authorized or Not Prohibited. Be authorized or not prohibited under federal, state or local laws or regulations;
3. Conform to Limitations or Exclusions. Conform to any limitations or exclusions set forth in these principles or other governing limitations as to types or amounts of cost items;
4. Consistent with Grantee Activity. Be consistent with policies, regulations and procedures that apply uniformly to other activities of the agency of which the grantee is a part;
5. Consistent with Accepted Accounting Principles. Be accorded consistent treatment through application of GAAP appropriate to the circumstances;
6. Conform to Cost Sharing or Matching Requirements. Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior-period unless specifically authorized;
7. Net of Credits. Be net of all applicable credits; and
8. Documented. Be adequately documented.

### Allocation of Joint Costs

The grantee shall comply with the provisions of allocating joint costs described as follows:

1. Allocable Costs. Costs are allocable to grants according to the following:
  - a. Relative Benefits and Consistent Treatment. A cost is allocable to a particular cost objective, such as a title, program activity or cost category in accordance with the relative benefits received. A cost is allocable to a grant if it is treated consistently with other costs incurred for the same purpose in similar circumstances and if the following applies:
    - (1) The cost is incurred specifically for the grant.
    - (2) The cost benefits both the grant and other work and can be distributed in reasonable proportion to the benefits received.
    - (3) The cost is necessary to the overall operation of the organization although a direct relationship to any particular cost objective cannot be shown.
  - b. Avoiding Deficiencies or Restrictions. Any cost allocable to a particular grant or other cost objective under these principles may not be shifted to other federal grants to overcome funding deficiencies or to avoid restrictions imposed by law or by the terms of the grant.
2. Direct Costs. Direct costs must be charged directly to a particular grant and cost objective.

## Property Management

All equipment referred to in this section of the manual pertains to equipment purchased for Employ Milwaukee office and any equipment purchases of \$5,000 or more reimbursed to contracting agencies.

Equipment is defined as all items with a unit acquisition cost of \$5,000 or more.

The Fiscal Department will maintain a listing of all equipment with a unit acquisition value of \$5,000 or more.

The procurement policies apply to all equipment purchases.

All property with a life expectancy greater than one year and a cost greater than \$5,000 purchased with Federal funds will be maintained in the inventory register with a description of the property, serial number when applicable, the inventory tag number, acquisition source, unit cost, date of purchase, Federal Fund, name, location of equipment, condition, percentage of federal cost and whether title vests in grantor or grantee.

The CFO & IT Department will reconcile the physical inventory with the previous Inventory Register and make the necessary adjustments.

### **Cost Allocation**

Annually the CFO will review the cost allocation plan. Updates will be made as needed. Chief Executive Officer will review cost allocation plan when changes are made.

## Subgrantee

### Contract Review (Subgrantee)

All subgrantee contracts are created by the Contract and Fiscal Compliance Manager using documents supplied by Program Staff. The Contract and Fiscal Compliance Manager reviews the contracts to ensure that the grant amount agrees to the award letter, that all pages are included, that the budget is proper and to assure that the budgets expenditures are reasonable based on the type of contract.

Benchmarks are also reviewed and footed by the Contract and Fiscal Compliance Manager.

The Contract and Fiscal Compliance Manager packages the contract and submits it to the Program Manager for final review and approval. Then it is forwarded to the Director of Planning & Programs and the CFO for approval. The CFO approves the Purchase Order. The Contract and Fiscal Compliance Manager submits the contract to the Service Provider for signature and then to the Chief Executive Officer for signature. The Staff Accountant encumbers the contract in the accounting system. The contract is mailed out with a cover letter prepared by the Staff Accountant.

The Staff Accountant files a signed copy of the contract by subgrantee & supplies a copy to the Program Manager.

Invoices are submitted by the subgrantee to Employ Milwaukee for payment. The Staff Accountant reviews the invoice for signatures, contract date, cost limits, mathematical accuracy, and other financial data. The Authorized EMPLOY MILWAUKEE program staff person approves the invoice. Payment will be made when staff indicates that contract requirements are satisfactorily met.

### Risk Assessment

Per 2 CFR 200.205 Employ Milwaukee completes risk assessments to gauge monitoring requirements for all subgrantees, for every new contract, based on the following guidelines:

1. Subgrantees that have not had or maintained a current relationship (within the last 12 months) with Employ Milwaukee.
2. Subgrantees that do not meet the minimum criteria for an annual audit.
3. Subgrantees that have known risk factors, per their annual audit, or any other information transmission (ie. word of mouth).
4. Subgrantees that are applying to receive new contractual agreements.

The Risk Assessment will be administered to the subgrantee by the Contracts & Financial Compliance Manager, if completed post award. After July 1, 2016, if an RFP is issued, the Risk Assessment will be included as part of Employ Milwaukee's RFP process.

The subgrantee will be provided the **Subgrantee Internal Control Questionnaire** and will complete and return to the Contracts & Financial Compliance Manager. The Subgrantee Internal Control Questionnaire will only be issued a maximum of once per year to each subgrantee.

The Contracts & Financial Compliance Manager will form a Risk Assessment Committee to review and score subgrantees utilizing the **Subgrantee Risk-Based Assessment Tool**. The committee will consist of both Program and Fiscal personnel familiar with the program and the subgrantee. The resulting score will determine the extent to which the subgrantee will require monitoring and/or its ability, or lack thereof, to perform the contract requirements.

### Risk Based Monitoring

The Contracts and Financial Compliance Manager will conduct annual on-site Monitoring of all sub grantees based on the Risk Assessment scores as noted below.

Employ Milwaukee's Monitoring Plan (MP) Strategy involves a multi-layer process as part of a Risk Based Monitoring Approach.

Per 2 CFR 200.205 Employ Milwaukee completes risk assessments to gauge monitoring requirements for all subgrantees, for every new contract, based on the following guidelines:

1. Subgrantees that have not had or maintained a current relationship (within the last 12 months) with Employ Milwaukee.
2. Subgrantees that do not meet the minimum criteria for an annual audit.

3. Subgrantees that have known risk factors, per their annual audit, or any other information transmission (ie. word of mouth).
4. Subgrantees that are applying to receive any new contractual agreements.

The Risk Assessment will be administered to the subgrantee by the Contracts & Financial Compliance Manager, if completed post award. After July 1, 2016, if an RFP is issued, the Risk Assessment will be included as part of Employ Milwaukee's RFP process.

The subgrantee will be provided the **Subgrantee Internal Control Questionnaire** and will complete and return to the Contracts & Financial Compliance Manager. The Subgrantee Internal Control Questionnaire will only be issued a maximum of once per year to each subgrantee. Although a Risk Assessment will be completed at the start of every new contract and/or start of a new contract term.

The Contracts & Financial Compliance Manager will form a Risk Assessment Committee to review and score subgrantees utilizing the **Subgrantee Risk-Based Assessment Tool**. The committee will consist of both Program and Fiscal personnel familiar with the program and the subgrantee. The resulting score will determine the extent to which the subgrantee will require monitoring and/or its ability, or lack thereof, to perform the contract requirements.

1. Subgrantees will be formally notified of total risk assessment scores.
  - A score of High or Moderate Risk levels will require a full annual on-site monitoring visit by both a Program and Fiscal Representative of the Grantor; in addition to other mandated monitoring requirements. The Subgrantee will be required to immediately respond and enact Corrective Actions to mitigate risks that contributed to the High or Moderate score.
  - A score of Low Risk levels will require annual "virtual" monitoring of the subgrantee by both a Program and Fiscal Representative of the Grantor; in addition to other mandated monitoring requirements. A Low Risk score does not eliminate or disqualify the subgrantee from the possibility of a full on-site monitoring. Employ Milwaukee reserves the right to require access for review at the subgrantees facility, for any reason, with, or without notice.
2. In general, prior to the start of an on-site engagement, a visit prep letter will be sent prior to the visit confirming the date and time, and documentation to be reviewed.
3. At the conclusion of the review, the audit representative and Grantor's Contract Monitor will discuss the findings with the Sub grantee's On-Site Manager and provide him/her with a Follow-Up letter within 30 days of the review. The discussion will include the strengths and deficiencies found in the review.
4. The Sub grantee shall be required to submit a Corrective Action (CA) within thirty calendar (30) days from the receipt of the Monitor's Follow-Up Letter as a result of not meeting any contractual obligation or federal/state requirement.
5. The final report of each year will count towards the Sub grantee's rating for following grant years.



6. Failure to submit an acceptable CA and/or failure to comply with previously accepted CA measures may result in placement on a Performance Improvement Plan (PIP). Placement on a PIP will require the Sub grantee to submit weekly quality assurance updates to the EMI Program Manager. The specific content required in these weekly updates will be presented in a formal PIP letter; the updates will provide the Grantor with confirmation that Sub grantee staff is making every effort to follow federal, state and local policies, while minimizing errors and preventing deficiencies.
7. If at any time the Grantor identifies a deficiency, the Sub grantee may be subject to a PIP. The PIP includes, but is not limited to: setting up a schedule of ongoing review of cases, on-site quality assurance reviews, providing written and/or on-site technical assistance for improvement until the errors identified have been corrected and an acceptable level of improvement has been demonstrated in the quality assurance process and/or the Grantor PIP identified reduction in the error rate is met. It is the Sub grantee's responsibility to implement best practices, develop corrective actions plans, and correct and prevent deficiencies.
8. If the Sub grantee is on a PIP, the Grantor's staff will conduct a follow-up review (file and/or system) and provide a Quality Assurance Report in order to identify training, provide technical assistance and conduct follow-up reviews to ensure that policies and procedures are correctly implemented.
9. Failure to demonstrate compliance with the PIP during the specified timeframe may result in an extension of the PIP or a breach of contract as determined by the Program Manager or Contracts & Financial Compliance Manager and the Grantor's management.

The closed monitoring packet will be reviewed by the CFO. Follow-up visits and/or documentation will be reviewed as needed. The Contracts & Financial Compliance Manager Intern will maintain a status report for each fiscal year.

### Subgrantee Audit Reports

All contractors that have received payments from Employ Milwaukee in excess of the major program threshold as defined in OMB-133 or the Uniform Grants Guidance are required to submit to Employ Milwaukee, an annual financial and compliance audit report prepared by an independent certified public accountant, licensed to practice in the State of Wisconsin.

On an annual basis the Contract and Fiscal Compliance Manager determines which contractors are required under OMB-133 or the Uniform Grants Guidance to have an independent audit. Once it is determined which contractors are required to submit audited reports, the Staff Accountant is to maintain a file on these contractors including the following:

1. Grantee name, contract number, audit period, and auditor firm name.

2. Contractor's audit report checklist.
3. Comments and correspondence regarding audit findings and determinations.
4. Close-out letter for finalized audit procedures.

Contractor audit findings and questioned costs that are applicable to Employ Milwaukee must be resolved between the contractor and Employ Milwaukee. At a minimum, Employ Milwaukee will ensure that contractors have met applicable audit requirements and that appropriate corrective action is taken in instances of non-compliance with laws and regulations applicable to Employ Milwaukee. Employ Milwaukee must ensure that appropriate corrective action is taken within six months after Employ Milwaukee receives the contractor audit report.

Employ Milwaukee must obtain the contractor's audit report within 9 months of the contractor's fiscal year end. Contractor audit reports must be sent to Employ Milwaukee within 30 days of receipt of the final report from the independent auditors.

Employ Milwaukee will determine whether the contractor audit necessitates adjustment of Employ Milwaukee's own records. Within 30 days Employ Milwaukee will make a written determination of contractor compliance with audit requirements as well as written recommendation for necessary corrective action in instances of non-compliance. These determinations and recommendations will be sent to the contractor along with a schedule of disallowed cost, if any. If the contractor is determined to be in compliance and requires no corrective action, the audit resolution process is considered to be complete and final.

Within 45 days of receipt of Employ Milwaukee's determination and recommendations, contractors deemed as needing corrective action will provide Employ Milwaukee with written evidence of corrective action measures that have been implemented. During this time Employ Milwaukee's staff will work closely with the contractor's staff to assist in establishing the appropriate corrective action.

Employ Milwaukee has approximately 60 days left to review the contractor's corrective action, determine its effectiveness in correcting the finding(s) or questioned cost(s) and if necessary, require further corrective action by the contractor. Any further corrective action must again be reviewed by Employ Milwaukee within the same 60-day period until the contractor is back into compliance.

At any point in this process when Employ Milwaukee enters into writing that a contractor is in compliance and no longer needing additional corrective action, the audit resolution process is considered final.

### EMPLOY MILWAUKEE Audit

Employ Milwaukee will have a financial, compliance and eligibility audit performed annually. Audits are procured in coordination with the WWDA RFP processes.

### *Preliminary Audit*

1. During the course of the audit, the audit firm will be in close contact with Employ Milwaukee staff to inform them of problems, potential disallowed costs, etc., with any of the contractors audits, informal resolution of potential findings can begin at this time.
2. After the field work of auditing Employ Milwaukee is complete, an exit conference will be held at which time Employ Milwaukee staff will be made aware of any findings that are to be in the Draft Report.
3. Between the exit conference and the Draft Report, informal resolution may continue.
4. The Personnel & Finance Committee will receive a report of all activities relating to the audit.

### *Draft Audit Report*

The Draft Audit Report will be issued to Employ Milwaukee Personnel & Finance Committee. This Report is not a public document.

### *Final Audit Report*

1. The Final Audit Report, incorporating the Draft Report and the Responses, will be issued by the audit firm to Employ Milwaukee Personnel & Finance Committee.
2. This report is a public document and initiates the Audit Resolution Process.
3. The response may include, but is not limited to the following: Interpretation of Audit Findings, further Documentation of Questioned Costs, Explanations, Changes in procedures made or planned etc.
4. The Final Audit Report responses will be approved by the Personnel & Finance Committee.

### *Findings and Determinations*

1. Based on Employ Milwaukee's response to the Final Audit Report, the DWD audit staff will issue a statement of Findings and Determinations. This is a public document.
2. The Personnel & Finance Committee will receive a copy of this document.

3. Employ Milwaukee has the option of contesting the findings. Employ Milwaukee may enter into the Formal Grievance Procedure by filing a written complaint with DWD.

## Other

### Board Minutes

Accurate minutes of all EMPLOY MILWAUKEE board meetings will be prepared by the Executive Assistant II or his/her designee.

The Chief Executive Officer will receive and review a copy of the minutes of all committee and Board meetings. Employ Milwaukee Board will also receive copies of all minutes and approve them.

### Insurance

Employ Milwaukee shall maintain the proper corporate insurance to include employee dishonesty (bond), workman's compensation, liability, and loss from fire and theft. Insurance documentation including policies shall be kept in a file in the Fiscal Department.

### Fiscal Procedures Manual

The Fiscal Procedures Manual is reviewed, at minimum, on an annual basis. More frequent reviews may occur when deemed necessary.

This Fiscal Procedures Manual is effective July 1, 2015.

### Current Staffing

Chief Financial Officer .....	<i>Patti Porth</i>
Contracts and Financial Compliance Manager	<i>Elizabeth Tyson/Jankowski</i>
Accounting Manager .....	<i>Jaime Zillmer</i>
Staff Accountant .....	<i>Andrew Herther</i>
Staff Accountant.....	<i>Open</i>
Accounting & Payroll Clerk.....	<i>Thongpanh Vongphouthone</i>
Accounting Intern.....	<i>Carmen De La Torre</i>



**Priority of Service Policy**  
**Workforce Innovation and Opportunity Act (WIOA)**  
**Adult Program**

**Effective July 1, 2017**

**Purpose**

The Workforce Innovation and Opportunity Act (WIOA) requires that local workforce boards have a priority of service policy for the delivery of WIOA career and training services. Additionally, the Jobs for Veterans Act (JVA), Public Law 107-288, includes a priority of service requirement for veterans and eligible spouses in qualified job training programs such as WIOA.

The Employ Milwaukee Priority of Service Policy incorporates the priority of service requirements of both WIOA and JVA for the WIOA Adult Program operated or administered by Employ Milwaukee.

**Background**

WIOA specifies that for provision of individualized career services and training services to adult participants priority must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient.

JVA requires that veterans and eligible spouses (“covered persons”) be given priority over non-covered persons (those not veterans or eligible spouses) for the receipt of employment, training, and placement services as provided by WIOA. Priority means that veterans and eligible spouses are entitled to precedence over non-covered persons for services. This means that a veteran or an eligible spouse receives access to a service earlier in time than a non-covered person.

**Definitions**

**Recipient of Public Assistance**

- Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, assistance through FoodShare, Temporary Assistance for Needy Families (TANF), or the Supplemental Security Income (SSI) program, or state or local income-based public assistance;

**Other Low-Income Individual**

An individual who meets any *one* of the following criteria satisfies the low-income requirement for WIOA adult services:

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Employ Milwaukee Priority of Service Policy (Adult-Veterans)

- Is in a family with total family income that does not exceed the higher of:
  - the federal poverty level guidelines; or
  - in relation to family size, is not in excess of the current combined U.S. Department of Labor 70 percent Lower Living Standard (LLS) Income Level and U.S. Department of Health and Human Services (HHS) Poverty Guidelines;
- Is a homeless individual as defined in §41403(6) of the Violence Against Women Act of 1994, or a homeless child or youth as defined in §725(2) of the McKinney-Vento Homeless Assistance Act;
- Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act;
- Is a foster youth on behalf of whom state or local government payments are made; or
- Is an individual with a disability whose own income meets:
  - WIOA's income requirements, even if the individual's family income does not meet the income requirements; or
  - The income eligibility criteria for payments under any federal, state, or local public assistance program.

#### Basic Skills Deficiency

Wisconsin has defined basic skills deficient as an individual that has English reading, writing, or computing skills at or below the 8<sup>th</sup> grade (8.9 or lower) level. It is expected that basic skills deficient will be determined using a generally accepted standardized objective, valid and reliable assessment, such as the Test for Adult Basic Education (TABE); or who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society..

#### Veteran

A person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of "active service" does not include full-time duty performed strictly for training purposes (i.e., that which often is referred to as "weekend" or "annual" training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities (State mobilizations usually occur in response to events such as natural disasters).

#### Eligible Spouse

The term "eligible spouse" means the spouse of any of the following:

- a. Any veteran who died of a service-connected disability;
- b. Any member of the Armed Forces serving on active duty who, at the time of application, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - i. Missing in action;
  - ii. Captured in the line of duty by a hostile force; or
  - iii. Forcibly detained or interned in the line of duty by a foreign government or power;

- c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- d. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

### **Priority of Service**

Veterans and eligible spouses continue to receive priority of service for all U.S. Department of Labor funded job training programs, which include WIOA programs. Since WIOA requires that priority of service be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in the provision of individualized career and training services, priority of service is provided as follows:

Priority #1: Veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient;

Priority #2: Non-covered persons (persons who are not veterans or eligible spouses of veterans) who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient;

Priority #3: Veterans and eligible spouses who are not also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient; and

Priority #4: Non-covered persons who are not also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient.

Priority of service means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under a qualified job training program. Priority means that veterans and eligible spouses are entitled to precedence over non-covered persons for services. This requires that a veteran or an eligible spouse receives access to a service earlier in time than a non-covered person.

For a service such as classroom training, priority of service applies to the selection procedure, as follows. First, if there is a waiting list for the formation of a training class, priority of service is intended to require a veteran or eligible spouse to go to the top of that list. Second, priority of service applies up to the point at which an individual is both: a) approved for funding; and, b) accepted or enrolled in a training class. Therefore, once a non-covered person has been both approved for funding and accepted/enrolled in a training class, priority of service is not intended to allow a veteran or eligible spouse who is identified subsequently to “bump” the non-covered person from that training class.

### Priority of Service Delivery

Veterans and eligible spouses are **required to be identified** at the point of entry into WIOA services, **and to be informed** of and given the opportunity to take full advantage of the following:

- The full array of WIOA employment, training, and placement services available;
- Applicable eligibility requirements for programs and services;
- Their entitlement to priority of service for those who meet the eligibility requirements for WIOA services and programs.

The **Employ Milwaukee website** for adult job seekers is **not a point of entry into WIOA services**. However, it informs users that veterans and spouses are entitled to priority of services and includes links to U.S. DOL websites containing information on employment and training services for veterans.

The following process is to be used by all WIOA career coaches:

- Career coaches will provide veteran and eligible spouse customers with copies of both the Employ Milwaukee Priority of Service Policy and the Veterans and Eligible Spouses Priority of Service Rights.
- Veteran and eligible spouse customers will sign an Acknowledgement Form that they received copies of the Policy and the Service Rights (the acknowledgement is to be kept in the customer file and included in the registration packet sent to Employ Milwaukee);
- Veteran or eligible spouse status must be indicated on all referrals for WIOA services.

### Monitoring

The following monitoring procedures are utilized to ensure compliance with the requirements in this policy:

- Employ Milwaukee
  - Reviews each new WIOA registration to verify that all required information, which includes veteran status, has been entered into ASSET and the ETO databases.
  - Reviews every WIOA registration documentation packet to verify that a signed Acknowledgement Form is included.
  - Reviews all vouchers for WIOA services before approval.
- All referrals to non-vouchered services must be approved by Employ Milwaukee and are reviewed for veteran status and priority.
- Regularly held WIOA career coach meetings will include training on the Priority of Service Policy as well as any federal, State, and local updates and modifications.



Employ Milwaukee is an Equal Opportunity Employer, Service Provider and proud partner of the American Job Center network.  
Auxiliary aids and services are available upon request for individuals with disabilities.



## **Priority of Service Policy – Veterans and Eligible Spouses** **Workforce Innovation and Opportunity Act (WIOA)**

**Effective July 1, 2017**

### **Purpose**

The Workforce Innovation and Opportunity Act (WIOA) requires that local workforce boards have a priority of service policy for the delivery of WIOA career and training services. Additionally, the Jobs for Veterans Act (JVA), Public Law 107-288, includes a priority of service requirement for veterans and eligible spouses in qualified job training programs such as WIOA.

This Employ Milwaukee Priority of Service Policy incorporates the priority of service requirements of both WIOA and JVA for the WIOA Programs operated or administered by Employ Milwaukee (exclusive of Adult Services which has additional requirements addressed in an additional and separate Priority of Service Policy).

### **Background**

WIOA and JVA require that veterans and eligible spouses (“covered persons”) be given priority over non-covered persons (those not veterans or eligible spouses) for the receipt of employment, training, and placement services as provided by WIOA. Priority means that veterans and eligible spouses are entitled to precedence over non-covered persons for services. This means that a veteran or an eligible spouse receives access to a service earlier in time than a non-covered person.

### **Definitions**

#### **Veteran**

A person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of “active service” does not include full-time duty performed strictly for training purposes (i.e., that which often is referred to as “weekend” or “annual” training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities (State mobilizations usually occur in response to events such as natural disasters).

#### **Eligible Spouse**

The term “eligible spouse” means the spouse of any of the following:

- a. Any veteran who died of a service-connected disability;
- b. Any member of the Armed Forces serving on active duty who, at the time of application, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - i. Missing in action;
  - ii. Captured in the line of duty by a hostile force; or
  - iii. Forcibly detained or interned in the line of duty by a foreign government or power;
- c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- d. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

### Priority of Service

Veterans and eligible spouses continue to receive priority of service for all U.S. Department of Labor funded job training programs, which include WIOA programs. Priority of service means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under a qualified job training program. Priority means that veterans and eligible spouses are entitled to precedence over non-covered persons for services. This requires that a veteran or an eligible spouse receives access to a service earlier in time than a non-covered person.

For a service such as classroom training, priority of service applies to the selection procedure, as follows. First, if there is a waiting list for the formation of a training class, priority of service is intended to require a veteran or eligible spouse to go to the top of that list. Second, priority of service applies up to the point at which an individual is both: a) approved for funding; and, b) accepted or enrolled in a training class. Therefore, once a non-covered person has been both approved for funding and accepted/enrolled in a training class, priority of service is not intended to allow a veteran or eligible spouse who is identified subsequently to “bump” the non-covered person from that training class.

### Priority of Service Delivery

Veterans and eligible spouses are **required to be identified** at the point of entry into WIOA services, **and to be informed** of and given the opportunity to take full advantage of the following:

- The full array of WIOA employment, training, and placement services available;
- Applicable eligibility requirements for programs and services;
- Their entitlement to priority of service for those who meet the eligibility requirements for WIOA services and programs.

The **Employ Milwaukee website** for adult job seekers is **not a point of entry into WIOA services**. However, it informs users that veterans and spouses are entitled to priority of services and includes links to U.S. DOL websites containing information on employment and training services for veterans.

The following process is to be used by all WIOA Career Coaches:

- Career Coaches will provide veteran and eligible spouse customers with copies of both the Employ Milwaukee Priority of Service Policy and the Veterans and Eligible Spouses Priority of Service Rights.
- Veteran and eligible spouse customers will sign an Acknowledgement Form that they received copies of the Policy and the Service Rights (the acknowledgement is to be kept in the customer file and included in the registration packet sent to Employ Milwaukee);
- Veteran or eligible spouse status must be indicated on all referrals for WIOA services.

### **Monitoring**

The following monitoring procedures are utilized to ensure compliance with the requirements in this policy:

- Employ Milwaukee
  - Reviews each new WIOA registration to verify that all required information, which includes veteran status, has been entered into ASSET and the ETO databases.
  - Reviews every WIOA registration documentation packet to verify that a signed Acknowledgement Form is included.
  - Reviews all vouchers for WIOA services before approval.
- All referrals to non-vouchered services must be approved by Employ Milwaukee and are reviewed for veteran status and priority.
- Regularly held WIOA Career Coach meetings will include training on the Priority of Service Policy as well as any federal, State, and local updates and modifications.



## **Employ Milwaukee** **WIOA Individual Training Account** **Policy and Procedure (ITA)**

**Effective July 1, 2017**

The Workforce Innovation and Opportunity Act (WIOA) provides for occupational training to be subsidized by an Individual Training Account (ITA). Adults and dislocated workers are eligible for qualified training services from eligible providers they select in consultation with their career coach. The local board may impose limits on ITAs such as dollar amounts, payment methods and duration.

Employ Milwaukee has set the following policies and procedures for issuing ITAs for individuals who have registered under WIOA and received basic and individualized career services.

### **POLICIES**

#### **Dollar and Duration Limitations**

- The total value of all vouchers issued to an individual shall not exceed **\$4,000**. There are limited exceptions (see Exception Policy) that allow the maximum value to exceed this amount up to a total of **\$7,000** which is the lifetime limit. The ITA shall cover tuition, books, fees and all other educational materials and supplies. These are lifetime limits, regardless of the exit from and subsequent re-entry into the WIOA Program.
- One individual ITA voucher cannot exceed 6 months of training. Multiple vouchers for the same course of study may not exceed 4 consecutive semesters.
- Although WIOA is generally a one- time training option, certain career pathways benefit from industry recognized stackable credentials. These are permissible as long as it is consistent with the Individual Employment Plan and does not cause participant to exceed the lifetime voucher limit.
- Individuals receiving an ITA voucher cannot receive another until 12 months after the first training program has been completed unless Employ Milwaukee provides signatory approval.

**Permissible Training Programs**

- The training must be for an occupation in demand. This means that it needs to be within one of Employ Milwaukee’s targeted sectors. If an individual is seeking training outside of the sectors, State and local labor market information must be used to determine the likelihood of individuals finding employment in a training related field. Signatory approval is required.
- The training must be consistent with the customer's individual employment plan.
- The ITA is issued only if the customer is not eligible for other training subsidies or grants except where permitted by federal or State law or regulations, which must be clearly documented in the participant file or the ITA grant must be coordinated with any other resources for which the participant is eligible.
- ITAs may only be issued to training providers who are listed on the State of Wisconsin List of Eligible Training Providers.
- ITAs for completion of a Baccalaureate degree will be considered if the degree can be completed in four semesters or less. Baccalaureate degrees designed to compress 4 years of study into two years or less will not be considered. ITAs for Post-Graduate degrees will not be considered.

**Participant and Financial Aid Responsibilities**

- All individuals applying for training funds for completion of their Baccalaureate degree, 1 and 2 year Associate Degree, Vocational Diploma or Vocational Certificate full-time programs at a post-secondary or state/federal accredited training program are required to apply for federal financial aid. A participant may enroll in a training program with ITA funds while an application for financial aid is pending.
- WIOA funds may not to be used for training where other sources of grant assistance are available, for example, State-funded training funds and Federal Pell Grants. Therefore, Employ Milwaukee can only use WIOA funds to pay for the balance of the training costs not covered by other funding sources. In the case of Pell Grants, WIOA can only pay for tuition costs not covered by Pell. However, WIOA can pay for “other education-related expenses”, even if covered by Pell Grant dollars.
- The educational institution's financial aid officer is required to inform the Career Coach of the amounts and dispositions of any financial aid grants to an individual awarded after

enrollment of that individual, as part of a continuing regular information sharing process. Training providers are prohibited from holding the participant liable for costs covered by WIOA funds but not paid.

- It is expected that the applicant has made a commitment to complete the chosen training after considering a variety of options. Should the applicant fail to start or choose to discontinue authorized training; the individual must notify their career coach and training institution immediately.

## **PROCEDURES**

### **Payment Method for Training Providers When Serving WIA Adults**

- All ITA voucher payments to training providers will be based on the following benchmarks: 80% of the voucher value at program enrollment, 20% when the student is employed for 30 calendar days at an hourly wage that is consistent with the self-sufficiency wage calculator provided through ASSET. The employment must be documented on a Verification of Employment (VOE) form.
- The 80% payment method shall apply to the tuition costs and tuition related fees.
- Books, Uniforms, supplies, and non-tuition fees listed on the ITA will be paid on a cost reimbursement basis. Any of these items necessary for the training but not included in the ITA cost will be vouchered and documented as a supportive service.
- If the training exceeds one semester in length, payment on employment will be made at the end of the entire training period.
- Training providers who are reimbursed at 100% include Technical Colleges and Universities and 4Cs of Greater Milwaukee, or others that may be added after consideration by Employ Milwaukee.

### **Career Coach Responsibilities**

- In conjunction with the career coach, the customer will choose a training program and suitable provider from the State approved Eligible Training Provider List (ETPL).
- The career coach will complete an ITA voucher and submit it with all required supporting documentation to the agency supervisor or manager for signature.
- A copy of the voucher is sent to the Training Provider once approved.

- If the voucher involves exceptions which may permit exceeding the **\$4,000** cap, approval from Employ Milwaukee must be obtained prior to completion and approval of the voucher.
- The career coach tracks attendance of the customer in the training, and records in ASSET case notes, training referral, training attendance, training completion, credential attainment, job placement and follow-up information. This information is also reported in ETO.

### **BENCHMARK DEFINITIONS FOR USE WITH ITAs**

#### **Enrollment**

Enrollment is defined as attending the first week of a training, other than the orientation. Please note that a “week” may vary by provider definition. For example, if a class meets twice a week, this is a week of attendance, etc.

The invoice must be accompanied by an enrollment list. Then a unit rate (80% of tuition) will be paid.

Non-tuition expenses such as books, supplies, uniforms, or registration fees, should be invoiced along with and in addition to the enrollment invoice. These expenses will be paid in full.

#### **Placement**

When a WIOA registered individual completes the training and obtains unsubsidized employment that meets the wage requirements and retains that job for at least 30 days, a unit rate (20% of the ITA tuition total) will be paid.

### **INDIVIDUAL TRAINING ACCOUNTS EXCEPTION POLICY**

**BACKGROUND:** Employ Milwaukee’s Program Committee established policies that govern the use of Individual Training Accounts in this Workforce Development Area. These policies include a \$4,000 cap value per individual with exceptions for specific trainings with a justification statement accompanying the voucher.

Where the cost of training exceeds **\$4,000** and includes a reasonable justification, the ITA voucher may exceed **\$4,000**, but may never exceed **\$7,000 in total**.



**OCCUPATIONS THAT REQUIRE HIGHLY SPECIALIZED EQUIPMENT OR SUPPLIES**

Where the cost of training exceeds **\$4,000** due to the cost of required books, other supplies or specialized tools or equipment, the ITA voucher may exceed **\$4,000**, but in no case may the total exceed **\$7,000**.

**TRAININGS THAT REQUIRE LONGER DURATION**

All listed trainings that require more than 16 weeks and fall within the range of **\$4,000** dollars funding will be honored. If the training is longer than 16 weeks and the cost is more than **\$4,000** dollars, the ITA voucher may exceed **\$4,000**, but may never exceed **\$7,000 in total**.

**PRIOR APPROVAL REQUIRED**

A written justification to approve a training that falls within this exception policy must be included in the training packet to the Contract Compliance Specialist. Once Employ Milwaukee has given signatory approval to exceed the training cap, the voucher may be completed and processed as usual.



## Employ Milwaukee On-The-Job Training Policy

**Effective July 1, 2017**

### **Background**

On-the-Job Training can be an effective tool in assisting participants who, after receiving basic and individualized career services, have been unsuccessful in obtaining or retaining employment that allows for self-sufficiency. This form of training is an exception to the requirement under WIOA to establish an Individual Training Account for eligible individuals to finance training services.

On-the-Job Training funds may be used to support placing participants in a registered apprenticeship program and can be combined with Individualized Training Account funds to do so as provided in 20 CFR § 680.740 and § 680.750.

OJT is defined as paid training by an employer that is provided to a participant while engaged in productive work. An OJT:

- Provides knowledge or skills essential to the full and adequate performance of the job;
- Typically provides reimbursement to the employer of up to fifty percent of the wage rate of the participant (under limited circumstances may be increased to seventy-five percent as provided in 20 CFR § 680.730), for the extraordinary costs of providing the training and additional supervision related to the training; and
- Is limited in duration to the time required for the participant to become proficient in the occupation for which the participant is being trained, taking into account the skill requirements of the occupation, the academic and occupational skill level of the participant, the prior work experience of the participant, and the service strategy of the participant.

Payments made to employers are considered to be reimbursements for the extraordinary costs of training, including lower productivity, which are over and above normal training that would be provided to non-WIOA eligible new hires. Extraordinary costs are defined as the difference between the costs of training and the productivity associated with employing WIOA participants to costs associated with others similarly employed. Employers are not required to document such extraordinary costs.

The following guidelines are designed to assist staff in developing an OJT position. These guidelines will also assist in meeting the federal regulations which require that, to be allowable, costs incurred in the OJT contracting process must be necessary and reasonable.

### **On-the-Job Training**

A. Identification of On-the-Job Training Need

An OJT contract is appropriate when the participant lacks the skills necessary to obtain or retain employment with that specific employer. The need for any OJT should also be identified in the individual employment plan wherein the participant's interests, abilities, and needs are identified.

B. Selection of Participants for OJT

At a minimum, an individual must receive at least one intensive service, such as development of an individual employment plan with a case manager or individual counseling and career planning, before the individual may receive training services. The individual must also have been unsuccessful in obtaining or retaining employment that allows for self-sufficiency. In addition, the case file must contain a determination of need for training services as identified in the individual employment plan, comprehensive assessment, or through any other intensive service received.

In most cases, on-the-job training is not an appropriate activity for youth participants under age 18. However, per 20 CFR 681.800, Employ Milwaukee (EMI) will choose to use this service strategy for eligible youth when it is appropriate based on the needs identified by the objective assessment of an individual youth participant.

An individual referred to the program by an employer (reverse referral) may be considered for OJT with the employer if the following conditions are met:

1. The individual has not already been offered the job;
2. The individual lacks the skills necessary for the job;
3. Because of the lack of skills, the employer will only hire the individual under an OJT contract;
4. The job is open to any qualified applicant; and
5. The individual has met eligibility requirements for intensive services and has received an assessment, and for whom an individual employment plan has been developed.

OJT contracts may be written for eligible employed workers when:

1. The employed individual is not earning a self-sufficient wage as determined by EMI; and
2. The OJT relates to the introduction of new technologies, new products or service procedures, upgrading to new jobs that require new skills, workplace literacy, or other purposes identified by the EMI.

Individuals who have completed formal training via an Individual Training Account (ITA), but are at risk of not achieving employment within 90 days of training completion, may be considered for OJT if it creates an opportunity for a positive outcome.

C. Selection of Employers for OJT

Prior to the selection of an employer for OJT participation, a pre-award review must be conducted to ensure that the business, or part of the business, has not relocated from another location in the U.S., if the relocation resulted in any employee losing his or her job at the original location.

Prior to committing funds for OJTs, staff will utilize an “OJT Checklist” to evaluate potential OJT employers (i.e., business size, length of time in business, type of business, percentage of workforce to be OJTs, previous OJT participation, adequacy of personnel and accounting systems, etc.). This can assist in determining if the OJT experience will be of good quality, the employer is able to provide the training, and trainees will be retained into permanent employment that offers good pay and benefits, with opportunities for career advancement.

Potentially eligible employers able to participate in OJT contracting include: private-for-profit businesses, private non-profit organizations, and public sector employers. Employment and employee leasing agencies may be eligible for OJT contracts if all other requirements are met and they provide permanent on-going employment (not probationary, temporary, or intermittent) in a specific occupation and they place employees at the worksite of another employer to perform work for such employer.

An employer will not be eligible to receive WIOA OJT training reimbursements if:

1. The employer has a history of failing to provide WIOA or WIA participants with continued long-term employment with wages, benefits, and working conditions that are equal to those provided to other employees who have worked a similar length of time and who are doing the same type of work.
2. There is not a reasonable expectation of continuing employment in the occupation being trained for.
3. The employer is not in compliance with applicable assurances and certifications.

In addition:

1. WIOA OJT is not an entitlement program for employers. The decision to enter into an OJT contract with an employer is at the discretion of EMI.
2. Reimbursements for OJT are not intended to be wage subsidies to employers for normal hiring and training of employees; rather they are intended for extraordinary costs of training WIOA participants. Some of these costs include more intense supervision, above average material wastage, abnormal wear on tools, down time, and a lower rate of production.
3. Payments made are reimbursement for regular “straight” time; for actual hours worked with no overtime premium, holiday pay, vacation, sick days, time spent on jury duty, or fringe benefits included.
4. OJT payments to employers may include scheduled pay raises or regular pay increases, comparable to similarly situated non-OJT employees.
5. Participants under WIOA OJT contracts shall comprise no more than 25% of the employer’s employees. However, EMI may make exceptions for a higher percentage on a case-by-case basis either for a particular employer or industry sector. A high percentage of OJTs at a single employer calls into question whether the funds are being used for business development/

subsidy without which the business would not exist/be sustainable. One requirement of OJT is to assess the participant's skills against the requirements of the job. If all/most of the trainees are OJT, it would be difficult to assess. In addition, the quality of training and supervision for a large number of OJT positions would be questionable.

D. Occupational Eligibility

OJT is allowable for occupations which are consistent with the participant's capabilities, are in demand occupations which will lead to employment opportunities enabling the participant to become economically self-sufficient and which will contribute to the occupational development and upward mobility of the participant on a career pathway. Consideration will be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan.

Occupations selected for OJT shall meet, at the time of completion or per company policy, the following:

1. Full time permanent positions (minimum of 32 hours per week);
2. All participants shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. This will include unemployment compensation where the employer is normally required to provide such coverage to its employees; and
3. The position provides the participant benefits per company policy which have a monetary value (i.e., insurance, paid leave, profit sharing) other than those required by law.

Occupations under which individuals may not be placed under an OJT contract include, but are not limited to the following:

1. Occupations depending on commission as the primary income source.
2. Professional occupations for which the trainee already possesses a license (e.g., real estate agent, insurance agent, bartender, etc).
3. Occupations dependent on tips or gratuities as the primary income source.
4. Occupations which provide for only temporary or intermittent employment.
5. A low-skilled occupation that would generally require little or no training (i.e., less than six weeks), which is considered to be the normal training period for any new employee.

Generally, consideration of high turnover jobs should be avoided. In certain situations, where the returns on investment, potential earnings, or needs of the specific customer warrant it, such opportunities may be acceptable.

E. Content of the OJT Contract

OJT contracts will specify:

1. Occupation for which training is to be provided;
2. Name of the participant to be trained;

3. Immediate supervisor's name;
4. Wage rate;
5. Method and maximum amount of reimbursement;
6. Beginning and ending dates of the contract;
7. Job description and a training plan including training hours by skill areas or tasks;
8. Special health or safety equipment or precautions required, if any;
9. Special tools or uniforms required, if any, and whether or not the employer will supply them;
10. Any costs associated with reasonable accommodations for individuals with disabilities;
11. Modification conditions and requirements; and
12. Contract termination conditions.

OJT contracts will contain appropriate assurances and certifications including:

1. Compensation for the participant at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills. Such rates may not be less than the higher of the federal or State minimum wage.
2. Provision of benefits and working conditions at the same level and extent as other employees of similar longevity and doing the same type of work. This will include unemployment compensation coverage where the employer is normally required to provide such coverage to employees. The employer must also secure worker's compensation or other insurance coverage for work-related injury of trainees.
3. Maintenance, retention, and access to records by the EMI, State, and Department of Labor personnel to support the training activity and associated reimbursements, i.e., time and attendance records, payroll records, invoice and reimbursement documents, and other information necessary to respond to monitoring reviews or audits (documentation of extraordinary costs are not required).
4. Prohibition on the use or proposed use of WIOA funds as an inducement to a business or part of a business to relocate if the relocation results in any employee losing his/her job at the original location.
5. Prohibition on the use or proposed use of WIOA training funds on any business or part of a business that has relocated from any location in the U.S., until the company has operated at the new location for 120 days, if the relocation resulted in any employee losing his/her job at the previous location.
6. No currently employed worker shall be displaced by the OJT participant including a partial displacement such as a reduction in the hours of non-overtime work, wages, or employment benefits. The employer also agrees that no OJT participant shall be placed into a position that is currently vacated by an employee who is on layoff, involved in a work stoppage or on strike, or is open due to a hiring freeze, or into a position in which the employer has terminated the employment of any regular employee or otherwise reduced its workforce with the intention of filling the vacancy so created by hiring the eligible worker. The employer further agrees that this contract does not infringe in any way upon the promotional opportunities of current employees.
7. No OJT contract shall impair: (a) existing contracts for services; or (b) existing collective bargaining agreements, unless the employer and labor organization concur in writing with respect to any elements of the proposed activities which affect such agreement.

8. Assurance that adequate supervision will be provided at all time while the trainee is on the job site.
9. Health and safety standards under Federal and State law are equally applicable to OJT participants.
10. The employer must comply with civil rights law and regulations, including nondiscrimination.
11. Prohibition on the use of WIOA funds to directly or indirectly assist, promote or deter union organizing or engage in political activities (including lobbying) during work hours.
12. No officer, employee or other agent of the employer shall recommend hiring, decide hiring, establish salary/wage rate, or provide preferential supervisory treatment with respect to a trainee who is a member of the officer's, employee's or agent's immediate family.
13. Prohibition on being employed in the construction, operation or maintenance of any facility that is used for religious instruction or worship.
14. Prohibition on the use of funds for construction except for provision of reasonable accessibility and accommodation.

F. Determining Length of OJT Contract

An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. The amount of training hours needs to take into account the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, the participant's individual employability plan, job accommodations that may be required, and discussions with the employer. The contracted training hours cannot include those types of training normally provided by the employer for new employees such as orientation to the job/business, safety procedures, etc. In addition, consideration must be given to recognized reference materials such as ONET which includes the Specific Vocational Preparation (SVP) system.

Generally, OJT contracts will not be done for less than six weeks or more than six months. Jobs that need less than six weeks training usually require no appreciable levels of training beyond periods of orientation that an employer would be expected to cover as part of their normal costs of doing business. Jobs that require more than six months of training to prepare a person for successful entry level employment will be reviewed on a case by case basis.

G. Developing the Training Plan

The OJT contract must include a copy of the job description and training plan. The job description and training plan, including skills to be learned on the job and the time necessary to learn each skill, must be sufficiently specific to verify that training was provided in accordance with the contract. The following guidelines apply:

1. Activities (the work statement) must be described clearly to show that the employer is obligated to conduct training.
2. Skills to be learned (measurable) should be separately listed with estimated training times for each.
3. Training times must be reasonable.

4. Training times must be geared to both the complexity of the job and the abilities of the trainee and in accordance with the SVP system.
5. Consideration must be given to recognized reference materials, such as ONET.
6. The training outline must identify the job title of the person(s) responsible for the training.
7. The training outline must include measurement and evaluation procedures.
8. The trainee, supervisor, and/or trainer should be knowledgeable about the training plan.
9. Consideration of reasonable accommodation(s), such as providing materials in an alternative format.
10. Identification of supportive services necessary for the individual to succeed.
11. The training site is accessible for individuals with disabilities and/or other special needs.

#### H. Employer Reimbursement

WIOA provides that occupational training may be provided through an OJT contract with an employer in exchange for wage reimbursement up to 50% for the extraordinary costs of providing the training and additional supervision related to the OJT. EMI will typically reimburse the employer at the 50% reimbursement rate. However, as prescribed in 20 CFR §680.730, EMI may increase employer reimbursement rate to 75% when taking into account the following factors:

1. Whether the participants are "individuals with barriers to employment," as defined in WIOA sec. 3(24);
2. The size of the employer, with an emphasis on small businesses;
3. The quality of employer-provided training and advancement opportunities, for example if the OJT contract is for an in-demand occupation and will lead to an industry-recognized credential; and
4. Other factors the Local Board may determine to be appropriate, which may include the number of employees participating, wage and benefit levels of the employees (both at present and after completion), and relation of the training to the competitiveness of the participant.

The factors used when deciding to increase the wage reimbursement levels above 50 percent up to 75 percent must be documented.

The appropriate program funds must be used for the appropriate WIOA-eligible population: OJT may be provided to low-income adults with WIOA Adult funds, and to dislocated workers with WIOA dislocated worker funds. OJT provided with statewide funds must serve WIOA eligible individuals.

#### **Monitoring**

The WDB has policies and procedures in place to ensure that:

- The training plan has measurable indicators of performance.
- Evaluation of those indicators will occur to determine if skills identified in the training plan have been acquired.
- Onsite visit(s) and other monitoring are conducted during the course of the OJT to determine compliance with WIOA requirements, including section 188, progress toward completion of the training plan and to resolve issues for the employer and/or participant.



Monitoring will ensure that the participant is receiving the training contracted for at the wages in the OJT contract, and that the participant is not required to engage in activities prohibited by WIOA. Employer records will be reviewed to assure that the participant is receiving proper wages and that the employer is withholding taxes and paying workers compensation (or equivalent) insurance.

## **Automated System Support for Employment and Training (ASSET) and Efforts to Outcomes (ETO) Reporting**

All participants will be recorded in the ASSET and ETO databases.

In ASSET, the OJT service can be found in the Manage Services Menu. For Adults and Dislocated Workers, the service is a Training Service. For Youth, the service is on-the-job training.

In ETO, when the training record is entered, OJT should be selected. If the employer/provider is not listed in the drop down menu, a request should be made to the EMI data department to add it.



**Self Sufficiency Policy**  
**Workforce Innovation and Opportunity Act (WIOA)**  
**Adult and Dislocated Worker Programs**

**Effective July 1, 2017**

**Subject: Employ Milwaukee Economic Self-Sufficiency Policy**

**Purpose**

This memo serves to articulate Employ Milwaukee's policy related to Economic Self-Sufficiency (ESS).

**Background**

The Wisconsin Department of Workforce Development communicated the State's position on ensuring a standard method by which Workforce Development Boards calculate economic self-sufficiency in each WDA. DWD-Division of Employment and Training Administrator's Memo 06-17 "Revised"<sup>1</sup> articulates the use of the Self-Sufficiency Calculator in ASSET as the tool to be employed for the purpose of calculating ESS.

DET Administrator's Memo 06-17 "Revised" provides WIOA regulatory context for its established policy.

**Economic Self-Sufficiency Calculator Pilot Project and Statewide Implementation**

The State initiated an ESS Calculator Pilot program beginning in the Waukesha-Ozaukee- Washington, Fox Valley and Western Wisconsin Development Areas in August 1, 2016. The pilot program was expanded to include Bay Area WDA on October 1, 2016.

Since that time, Employ Milwaukee Adult and Dislocated Worker Program staff have been working with DWD staff. Employ Milwaukee staff have served as "testers" for the tool to ensure the tool's technical capabilities meet the needs of practitioners and produce results as designed for the each WDA.

As stated in DWD Admin Memo 06-17 "Revised", Employ Milwaukee will implement the use of the Economic Self-Sufficiency Calculator as the basis to define ESS within WDA 2.

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<sup>1</sup> <http://www.dwd.wi.gov/det/adminmemos/pdf/2016/1607rev.pdf>



## Employ Milwaukee Supportive Services Policy

**Effective July 1, 2017**

### **I. Statement of Purpose**

The purpose of this policy and procedure is to set forth the necessary guidelines and implementation steps for provision of supportive services to eligible Employ Milwaukee, Inc. (EMI) program participants that include WIOA Title 1 Adult, Dislocated Worker, Office of Career Exploration (WIOA Youth) and other programs operated by EMI. In addition, EMI will adhere to supportive services guidelines for non-WIOA programs in accordance with funder requirements.

*Note: Policy guidelines, implementation steps and provision of supportive services may be adjusted based on funding source. An addendum will be added to EMI's supportive services policy to reflect provisions of supportive services for non-WIOA programs where there are differences.*

### **II. Definition and provision of Supportive Services**

Supportive services are those services necessary to enable an individual to participate in employment related activities authorized under Title 1 of the Workforce Innovation and Opportunity Act and other federal or state programs where supportive services is an allowable activity. **The extent of supportive services provided will vary based on the participant's needs and EMI's availability of funds and resources.** These services may only be provided to individuals who are actively:

- Participating in career or training services; or in the youth program (other than design framework);  
**AND**
  - Unable to obtain supportive services themselves or via their support network;
  - Unable to obtain supportive services through other programs including community agencies that provide these services; and
  - Demonstrate a need for assistance to enable him/her to participate in employment related activities.
- a. Allowable supportive services may include, but are not limited to:
- Assistance with uniforms or other appropriate work attire;
  - Assistance with work-related tools, including such items as eyeglasses and protective eye gear;
  - Testing and certification fees;
  - Assistance with transportation;
  - Assistance with child care and family related dependent care;
  - Linkages to community services;
  - Emergency housing;
  - Referrals to medical services and exams;
  - Legal aid services;
  - Assistance with books, fees, and school supplies

- b. Supportive services will only be provided when expenses are necessary to enable a participant to take part in education/training/employment related activities.
- c. Payment of supportive services will normally be made directly to the vendor providing the services and only be paid with prior authorization. Direct reimbursement to individuals, to compensate the person for expenses already incurred or paid, will not be provided without the written authorization of an EMI signatory. This may include the contract compliance specialist's signature on an approved voucher packet.
- d. Once a participant has exited, payments may be made on behalf of the participant on a case by case basis and the availability of funds. Career coaches will still be required to document the need for supportive services as it pertains to the obtaining/maintaining employment. *(Not all programs may allow supportive services after exit; career coaches will be required to follow the guidance as it pertains to the participants funding source)*

### III. Standard

The guiding principle for the provision of supportive services shall be based on the participant's individual need. Through counseling and assessment, the determination of the need and the level of assistance to be provided will be made.

Due to funding limitations, supportive service funding is to be used as a last resort. Career coaches shall explore other program funding options prior to EMI granting approval. The supporting documentation must be in the participant's case file. The cost of the supportive services issued must demonstrate direct connection to employment or education activities and training programming or barrier remediation of employment, education or training that will lead to or maintain unsubsidized employment and assist in skill development needed to obtain, maintain, and be successful in the workplace.

### IV. Transportation Policy

- a. Transportation assistance may be provided to participants who are engaged in activities where transportation is allowed as a supportive service.
- b. Career coaches must complete all supportive service documentation prior to EMI paying for services to support transportation costs. These documents include the following:
  1. Supportive services justification form
  2. Supportive Service Voucher Documentation Checklist
  3. Voucher
- c. Reimbursement for mileage costs: In order to be reimbursed the participant must have a valid driver's license, automobile liability insurance, automobile registration (all documents must be current), and drive a round trip daily in excess of 25 miles. The career coach must make copies of the documents and place them in the participant's file.
  - Parking may be reimbursed for approved training, career services, and verifiable job search.
  - Round trips of at least 25 miles for approved training, career services, and verifiable job search may be reimbursed at the current federal mileage rates.

- Mileage may only include travel to and from the training facility, and/or to and from a prospective employer.
- A voucher must be issued for the purpose of obligating and tracking available funding.
- Documentation verifying class attendance and/or job search is required.
- Participant Expense Reimbursement Request Forms and Mileage Logs must be completed and submitted to EMI within 10 days after the end of the claim month. Lack of timely submission may result in denial of the claim.
- A request for one week's worth of public transportation at a time may be distributed to individuals for approved training, career services and job search travel. For those in job search, the first request shall be approved without submitting an Employer Contact Log. Subsequent requests for public transportation require submission of an Employer Contract Log documenting the utilization of the previous transportation support.

**Maximum parking and mileage support is \$500.00 per participant per program year.** Exceptions will be considered based upon need and available funding, as determined by the career coach and approved by the contract compliance specialist. If program funds for transportation are exhausted, no further claims will be paid.

**V. Child Care Assistance**

- a. Child care assistance may be provided for those participants approved for classroom training and job search that are not eligible for assistance under TANF or other funding sources.
- b. Child care payments will not be made unless there is an actual cost to the participant for child care.
- c. The following documentation must be provided:
  1. Attendance sheets verifying class attendance and/or job search.
  2. Voucher must be issued for the purpose of obligating and tracking available funding.
  3. Child care logs must be completed and submitted to EMI within 10 days after the end of the claim month. Lack of timely submission may result in denial of claim.
  4. Supportive Service Voucher Documentation Checklist
- d. Reimbursement Rates: Child care reimbursement will be at a rate that is considered usual, reasonable, and customary within this geographic area.

One Child	\$3.00 per hour
Two Children	\$4.25 per hour
Three or more	\$5.00 per hour

**Maximum child care support per participant is \$500.00 per program year.** Exceptions will be considered based upon need and available funding, as determined by the career coach and approved by the contract compliance specialist. If program funds for child care are exhausted, no further claims will be paid.

**VI. Tools, Uniforms and Other Work Apparel**

- a. Tools, uniforms, and other occupation specific equipment may be provided to participants when such items are required for training (and have not been provided as part of the training cost) or as a condition of employment.
- b. While participants are receiving career or training services and specific apparel or tools are required, such purchases are an allowable cost. For participants who are still active and entering employment, costs for work required apparel and tools are an allowable expense.
  - o The job is a permanent full-time position; and
  - o Special clothing is required by the employer (work boots, protective gear, uniforms, etc.); or
  - o The employer requires only standard casual work clothing, but the participant is experiencing financial hardship and is unable to begin work without some appropriate work attire.
- c. The following documentation must be provided:
  1. A letter from the training provider or employer on letterhead containing confirmation of training or employment specifically identifying the items required and their approximate cost.
  2. A voucher must be issued for the purpose of obligating and tracking available funding.
  3. Original receipts with the Participant Expense Reimbursement Request form must be submitted to EMI within 10 days after the date of the claim. Lack of timely submission may result in denial of the claim.
  4. The participant must sign an agreement that he or she may be required to return tools or repay the cost of the tools if he/she leaves the job within the first 30 days of employment.

**Maximum tool, uniform and other work apparel support per participant is \$500.00 per program year.**

Reimbursement is dependent on availability of funds.

**VII. Medical**

Medical examinations and immunizations for areas of training and employment that require such are reimbursable to approved service providers or participants by EMI. A letter indicating the need must be provided by the training provider and/or employer.

**Maximum medical per participant is \$500.00 per program year.** Reimbursement is dependent on availability of funds.

**VIII. Other Supportive Services**

- a. Additional supportive service payments may include but are not limited to, assistance in obtaining a driver's license (this does **NOT** include tickets), work related licensure or testing, supplies for work, and emergency aid, etc.
- b. Career coaches must complete and maintain all forms and documentation to support other supportive service costs.
- c. Career coaches must complete all supportive service documentation prior to paying for such services. These documents will include the following relevant documentation:
  1. Participant Expense Reimbursement Request Form

2. Supportive Documentation Relevant to the Request
3. Voucher
4. Supportive Service Voucher Documentation Checklist

**Maximum other supportive services per participant are \$500.00 per program year.** Exceptions will be considered based upon need and available funding, as determined by the career coach and approved by the contract compliance specialist. If program funds are exhausted, no further claims will be paid.

**IX. Procedures**

- a. All program participants shall be informed of paid and unpaid supportive services available through the local service providers. This includes supportive services provided by partners, service providers and any applicable community resources.
- b. The career coaches shall determine the need for the supportive services of each individual enrolled and the need determination shall be based upon a comprehensive assessment with appropriate documentation. The need should be outlined in the Individual Employment Plan.
- c. As a prerequisite for applying for supportive services, other related resources must first be explored and the participant shall secure documentation of denial from other community resources. The career coach will work with participant on appropriate documentation regarding the need for supportive services, including the IEP or ISS and appropriate customer notes in ASSET.
- d. Career coaches shall periodically review the need for, and the receipt of, supportive services. Changes in supportive service needs are to be reflected in the assessment and noted in the file as appropriate. Sound case management and timely participant follow-up are essential to ensuring completion of activities and meeting participant goals and objectives. The need for supportive services and all supporting documentation shall be maintained in the participant's file.
- e. Prior approval for payment of supportive services is required. Authorization of supportive service payments shall be made utilizing EMI's vouchering system and approved by EMI's program designee. To request approval of supportive services for groups of participants, EMI may also use or modify the supportive services forms or develop similar authorization forms.
- f. A new form must be completed each time there are changes in the payment amounts or the duration of the supportive service.
- g. Career coaches are responsible for tracking participant attendance, time keeping and related duties. Educational/training institutions receiving funds must perform time keeping, participant activity tracking and related duties.

**X. Payments**

Approved service providers may be reimbursed for supportive service payments and invoices upon compliance with the following requirements:

1. Career coaches must ensure that participants are enrolled and actively participating in an allowable activity for which supportive service payments can be made and approved.
2. Supportive service payment documentation must be submitted to EMI.
3. Participants must meet attendance requirements of the program and career coaches must maintain participants' attendance documentation.
4. Reimbursement for supportive services will be made monthly to service providers or participants.
5. Career coaches must submit all required documents with voucher packet no later than 10 days after date of claim or month end (as applicable):
  - a. WIOA Supportive Service Documentation Checklist
  - b. Completed Voucher-signed and dated
  - c. EMI Supportive Service Justification Form
  - d. Purchase Approval Request Form (if applicable)
  - e. Supporting documentation including but not limited to:
    - i. Childcare or Transportation Logs
    - ii. Attendance Forms
    - iii. Receipts

**XI. References:**

- a. Workforce Investment and Opportunities Act (WIOA) Sections 134 (d)(2) and (3)
- b. 20 CFR secs. 680.900 – 680.970 and sec. 681.570
- c. Part 664, Subpart D, Youth Program Design, 664.440
- d. OMB Circular No. A-122 Allowable Cost Principals for Non-Profits
- e. OMB Circular No. A-87 Allowable Cost Principals for State and Local Government





## **Employ Milwaukee Adult & Dislocated Worker Follow-Up Services Policy**

**Effective July 1, 2017**

### **Purpose**

This policy is to provide guidance on what follow-up services are available to WIOA Adult & Dislocated Worker program participants who have completed their service plans and have obtained unsubsidized employment. In addition, it serves as the guideline on the process by which follow-up performance and data collection should be gathered.

### **Background**

Follow-up services must be provided as appropriate for participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment. Counseling about the work place is an appropriate type of follow-up service. Follow-up services do not extend the date of exit in performance reporting.

### **Policy**

The policy of Employ Milwaukee is to provide follow-up services to each participant that has obtained unsubsidized employment. In accordance with WIOA, the extent of the specific follow-up services provided to each participant shall be determined on a case-by-case basis. Career Coaches are to attempt to maintain contact on a quarterly basis. Quarterly contact is defined as attempting to directly contact the participant by email, USPS and/or phone. Email blast notifications are insufficient and are not considered individual follow up services. Career Coaches must document contact attempts and results thereof in ASSET in the form of a Case Note.

The follow-up services that are available to WIOA participants who have been exited because of employment may include, but not limited to:

- Career Planning and Counseling;
- Additional Educational Opportunities Information;
- Employer Contact;
- Participant Contact;
- Peer Support Groups;
- Referral to Supportive Services; and,
- Other Follow Up services.

**Other Follow-up Services**

When deemed necessary for job retention or advancement, or for re-engagement in the workforce, other follow up services may be provided to participants during the twelve month follow-up period. Participants may access said services with the assistance of a Career Coach.

Participants receiving additional supportive services are subject to the funding limits and applicable procedural requirements as specified in Employ Milwaukee's Supportive Services Policy.

**Action Required**

WIOA participants must be made aware of available follow-up services and the process by which these services are available. When developing the participant's individual employment plan, the WIOA Career Coach must include the provision of follow-up activities as part of the overall WIOA service plan. Participants must maintain contact with the Career Coach in order to access these services once employed. Services provided after entry into unsubsidized employment must be clearly documented in the participant's case file and in ASSET as Case Notes and Manage Services data entry.

**ASSET Entry Required**

All follow-up contacts must be recorded in ASSET Follow-Up Services Screen. Select from the dropdown list the appropriate service being provided. All required fields and the outcomes box must be completed. Please note that quarterly employment and wage information must be recorded in ASSET Follow-Up Status Screen, which differs from the Follow-Up Services Screen. When entering employment and wage information, enter data under the appropriate quarter's tab (first quarter, second quarter, third quarter, and fourth quarter after exit).



## **Employ Milwaukee** **WIOA Youth Incentive Policy**

**Effective July 1, 2017**

### **Purpose**

The Workforce Innovation and Opportunity Act (WIOA) Final Rule 20 CFR 681.640 provides for the awarding of incentive payments to youth participants for recognition and achievement directly tied to training activities and work experiences. These awards are intended to encourage and motivate WIOA youth to achieve specific goals and obtain positive outcomes. Reasonable incentives are allowable only if the local workforce board has written policies and procedures governing incentive payments, the provision of an incentive is included in the participant's individual service strategy, and are in accordance with the requirements contained in 2 CFR part 200. This document provides the policy of Employ Milwaukee, Inc. for granting incentive award payments to participants enrolled in the Title I Workforce Innovation and Opportunity Act (WIOA) youth program.

### **Policy**

Employ Milwaukee shall offer reasonable incentives to youth participants in recognition for achievement in their WIOA Title I training activities and work experiences. The justification for awarding incentives must be clearly defined in the youth's individual service strategy (ISS). Incentive award payments shall be made in a uniform and consistent manner that ensures all participants receive equal rewards for equal achievement.

For the purposes of this policy, the term "incentive award payment" shall mean a reward intended to recognize the achievement of a training activity or work experience, which can help motivate a youth to set and then achieve a training activity or work experience goal. The incentive award payment must be directly linked to attainment of a specific and measurable program outcome.

All incentive award payments are subject to the availability of WIOA funds and are not an entitlement. Employ Milwaukee may suspend or withdraw authorization for incentive award payments at any time and at its sole discretion.

Youth incentive award payments are limited to a maximum amount of \$500 per eligible youth per program year and are to be processed through a voucher.

Goals and/or training outcomes eligible for an incentive must be linked to an achievement related to training, employment, education, work readiness skills, occupational skills, and/or basic skills attainment goals as stated in the clients' ISS and documented in accordance with applicable WIOA regulations. Participants cannot receive multiple incentive payments for the same activity. Achievements eligible for

an incentive awards include:

- Attain high school diploma;
- Graduate an alternative school;
- Complete a GED test (incentive can be offered for each test completed);
- Career pathway exploration activities;
- Complete basic, work readiness, occupational skill attainment goals;
- Complete TABE post-test (attainment of measureable skill level gain for WIOA performance indicator)
- Create cover letter, resume, sample application, and follow-up letter (All 4 required);
- Obtain unsubsidized employment;
- Retention of employment for 90 consecutive days; and/or
- Attain an post-secondary credential (occupational certificate, diploma or degree)

A participant may be eligible for an incentive award when involved in an unpaid work experience. Documentation of attendance may be accomplished by timesheets signed by the participant and the supervisor/instructor or case manager.

Incentives are available to each WIOA eligible youth participant based on need documented in the participant's ISS. WIOA Title I service providers shall maintain required documentation detailing the distribution and management of awards. All incentives are taxable at the full amount of the award and subject to withholding in accordance with Internal Revenue Service (IRS) regulations.

Employ Milwaukee shall require all WIOA service providers and grantees receiving funds from a grant or contract administered by Employ Milwaukee to comply with this policy and applicable procedures. At a minimum, service providers shall:

- Document the need for the incentive and justify issuance of the award in the participant's ISS and in the ASSET system (customer notes).
- Record the provision of incentives payments in ASSET under Manage Services, "Incentives." This is a change from the previous guidance, which required entry of "Needs Related Payments (Stipends for Youth in Training)."
- Maintain records verifying the client received the award through an original signature on a receipt form. If the form is an electronic version, the case manager shall attach the approval email to the form to show the authenticity of the approved request.

It is the responsibility of each service provider to become aware of all applicable regulations and to monitor personnel and client activities to ensure compliance. Employ Milwaukee shall review service provider compliance with this policy during the annual monitoring process.

- References:
- Workforce Innovation and Opportunity Act of 2014; Final Rule, 20 CFR 681.640.
  - Uniform Guidance, 2 CFR Parts 200 and 2900.
  - WI DWD-Division of Employment and Training WIOA Policy Update 16-01: Youth Incentive Awards Payment Policy dated August 8, 2016.



**Wisconsin Job Center System  
Self-Certification Checklist**

The Workforce Innovation and Opportunity Act of 2014 requires that the State workforce board, in consultation with chief elected officials (CEOs) and local workforce boards, establish objective criteria and procedures for the local boards to use to assess and certify comprehensive one-stop centers (Section 121 (g)(1)).

Each local area is required to have at least one comprehensive job center located within its borders that provides all WIOA required programs and services.

Job Center certification is required for job centers to receive infrastructure funding as described by the standards established in WIOA Section 121(h). Chief elected officials and Workforce Development Boards are encouraged to extend services beyond these standards to better serve customers.

WDA: 2 – Milwaukee County		Date of Review: June 23, 2017	
Contact Person/Title: Peter Coffaro, Chief Programs Officer			
Phone: 414.270.1715		Email: Peter.Coffaro@employmilwaukee.org	
Job Center: Central			
Address: 4201 N. 27 <sup>th</sup> Street		City: Milwaukee	Zip Code: 53210
Website: <a href="http://www.employmilwaukee.org">http://www.employmilwaukee.org</a>			
Hours of Operation: Mondays, Tuesdays, Thursdays, and Fridays 8:00 a.m. – 5:00 p.m.; Wednesdays 8:00 a.m. – 7:00 p.m.			

**CERTIFICATION CHECKLIST**

REQUIREMENTS PER WIOA LEGISLATION REGULATIONS	CERTIFICATION CRITERIA
<b>EFFECTIVENESS (INTEGRATION OF AVAILABLE SERVICES)</b>	
<p>All required governing documents are in place prior to the comprehensive job center’s certification.</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The local MOU identifies the comprehensive job center and agreements for service integration.</li> <li><input checked="" type="checkbox"/> The MOU clearly delineates the roles and responsibilities of all partners.</li> <li><input checked="" type="checkbox"/> By July 1, 2017, a one-stop operator is competitively selected.</li> </ul>
<p>The job center meets the workforce development needs of participants (job seekers) as established in local plans.</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Required partners have established policies and procedures for service delivery and referrals among program partners (Section 678.500).</li> <li><input checked="" type="checkbox"/> Required partners have established policies and procedures for establishing co-enrollment in core programs. (Section 108(b)(3)).</li> </ul>
<p>The job center meets the needs of local businesses as established in local plans.</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The job center will provide career services to local employers such as labor market information.</li> <li><input checked="" type="checkbox"/> The job center will match businesses with the skilled workers they seek (Section 678.435).</li> <li><input checked="" type="checkbox"/> Required partners identify specific ways the job center will match businesses with the skilled workers they need (Section 678.435).</li> <li><input checked="" type="checkbox"/> Required partners identify specific ways the job center will respond to the economic needs of the local area as specified in the local plan.</li> </ul>
<p>The job center coordinates services among the required partner programs to provide access to integrated programs and services (Section 121(g)(B)(ii)).</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Frontline/intake staff are knowledgeable about basic program eligibility requirements and make referrals to partner programs (TEGL 4-15).</li> <li><input checked="" type="checkbox"/> Job center staff who perform similar tasks, work in functional teams rather than programmatic siloes (i.e. Business Services Team) (TEGL 4-15).</li> </ul>
<b>PHYSICAL AND PROGRAMMATIC ACCESSIBILITY</b>	
<p>The job center layout supports a culture of inclusiveness (WIOA Section 188 and 29 CFR part 38).</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The job center has a layout that is easily accessible and usable by individuals with disabilities.</li> <li><input checked="" type="checkbox"/> The job center is shown to be compliant with ADA guidelines by an inspection, audit, or review that has been completed within the last three years or has an approved corrective action plan identified.</li> <li><input checked="" type="checkbox"/> The local board provides program services, to the maximum extent possible, outside regular job center business hours to accommodate customers’ work, child care, and/or transportation needs (Section. 678.800).</li> </ul>

<p>Required partners provide access to services and activities through at least one physical location in each local area (Section 678.305).</p>	<p><input checked="" type="checkbox"/> Attach a document to the certification checklist that includes all comprehensive job center required partners and indicate how customers "access" the required programs and services (Section 678.300(d) and TEGl 16-16):</p> <ul style="list-style-type: none"> <li>• Program staff are physically present at the location,</li> <li>• Partner program staff physically present at the job center are appropriately trained to provide information to customers about the programs, services, and activities available through partner programs; or</li> <li>• Provide a "direct linkage" through technology to program staff. A "direct linkage" means providing direct connection at the job center, within a reasonable timeframe, by phone or web-based communication (i.e. Skype) to program staff who can provide program information or services.</li> </ul> <p><b>Please see Attachment A.</b></p>
<p>The job center displays the one-stop delivery system common identifier as required (Section 678.900).</p>	<p><input checked="" type="checkbox"/> The job center signage and marketing materials reflect the agreed upon "American Job Center" branding or a plan has been developed to bring signage and marketing materials in compliance with the common identifier requirements.</p>
<p><b>CONTINUOUS IMPROVEMENT</b></p>	
<p>The job center supports the achievement of the negotiated local levels of performance (Section 121 (g)(B)(1)).</p>	<p><input checked="" type="checkbox"/> Required partners are using state established systems for tracking performance outcomes (i.e. ASSET).</p>
<p>The job center has systems in place for collecting and analyzing customer feedback, both from job seekers and businesses, and the information is used to improve service delivery (Section 678.800(3)(b)).</p>	<p><input checked="" type="checkbox"/> The job center uses customer satisfaction surveys for participants and businesses to receive feedback on items such as customer access to services, satisfaction with provided services, timeliness of services provided, friendliness and knowledge of staff, and suggestions for improvement.</p>
<p>Job center staff and required partners invest in continuous improvement ensuring that staff can implement the latest policies and procedures developed at local, state, and federal levels (Section 678.800(c)).</p>	<p><input checked="" type="checkbox"/> The job center has a process for responding to the technical assistance needs of staff and required partners (i.e. joint trainings and staff meetings).</p> <p><input checked="" type="checkbox"/> The job center has a system in place to ensure that staff has the opportunity to participate in professional development opportunities (i.e. conferences attendance, Certified Workforce Development Professional certification).</p>

**ATTACHMENT A: CUSTOMER ACCESS TO REQUIRED PARTNERS  
AT MILWAUKEE JOB CENTER CENTRAL**

REQUIRED PARTNER	HOW CUSTOMERS ACCESS PROGRAMS AND SERVICES
Adults (WIOA Title I)	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Dislocated Workers (WIOA Title I)	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Youth (WIOA Title I)	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Job Corps	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
YouthBuild	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Native American Programs	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Migrant and Seasonal Farmworker	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs.



REQUIRED PARTNER	HOW CUSTOMERS ACCESS PROGRAMS AND SERVICES
Programs	<input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Wagner-Peyser (Job Service)	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Adult Education and Family Literacy (WIOA Title II)	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Vocational Rehabilitation (VR) (WIOA Title IV)	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Senior Community Service Employment Program	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Career and Technical Education (Perkins)	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Trade Adjustment Assistance (TAA) Program	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Jobs for Veterans State	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately

REQUIRED PARTNER	HOW CUSTOMERS ACCESS PROGRAMS AND SERVICES
Grants Programs	trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Community Services Block Grant Employment and Training Activities	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Housing and Urban Development Employment and Training Activities	<input type="checkbox"/> Program staff are physically present. <input checked="" type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Unemployment Insurance Program	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.
Second Chance Act Programs (Windows to Work)	<input checked="" type="checkbox"/> Program staff are physically present. <input type="checkbox"/> Partner program staff physically present at the job center are appropriately trained to provide information to customers about partner programs. <input type="checkbox"/> Provide a “direct linkage” through technology to program staff.

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**Rapid Response Standard Operating Procedure**

***I. Purpose***

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Rapid Response Process

In accordance with the Wisconsin Department of Workforce Development (DWD) Rapid Response Redesign, the following process has been developed and shall be implemented subject to approval by the Department.

***II. Scope***

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The MAWIB Rapid Response Process sets forth the process by which the MAWIB will:

- a) Build and Maintain a Local Rapid Response Framework by identifying by role and responsibility MAWIB, Department of Workforce Development Job Service (DWD JS) and AFL-CIO Labor Education & Training Center (LETC) partner staff designated to provide Rapid Response services.
- b) Manage Specific Layoff Events that are the result of notices of layoffs whether they be formal as in the case of Worker Adjustment and Retraining Notification (WARN) Act notification, or informal, as in the case of layoffs not subject to the stipulations set forth in the Act.
- c) Provide DWD with data specifically related to Quality Assurance in the delivery of Rapid Response services through predetermined reporting methodologies as required by DWD.

The process described herein shall be utilized and adhered to by all Rapid Response partners as specified by contractual requirement. Prior written approval must be granted by the MAWIB prior to any deviation from said process.

***III. Prerequisites***

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All parties involved in Rapid Response activities must be identified by contractual or other specified agreement with the MAWIB prior to engaging in Rapid Response activities. Rapid Response Team Partners include:

- Milwaukee Area Workforce Investment Board, Inc.
- Wisconsin Department of Workforce Development – Job Service
- Wisconsin Department of Workforce Development – Unemployment Insurance Division
- AFL-CIO Labor Education & Training Center

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***IV. Responsibilities***

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- MAWIB – Lead Agency in all Rapid Response Activities including Business Services for employer related activities as requested.
- LETC– Informational Sessions
  - Registration Sessions
  - Orientation/Intake Sessions
  - Workshop Modules
  - On-Site Transition Center staffing
- Wisconsin Department or Workforce Development Job Service – Informational Sessions
  - Job Center of Wisconsin Registration Assistance
- Wisconsin Department or Workforce Development – Unemployment Insurance Division – Informational Sessions

***V. Procedure***

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**Build and Maintain Rapid Response Framework**

1. The MAWIB will work directly with DWD staff in all Operational and Fiscal matters related to Rapid Response.
2. As the lead agency, the MAWIB shall delegate responsibility for all Rapid Response activities.
3. As indicated in *Section IV-Responsibilities*, the MAWIB has identified the roles and responsibilities and DWD JS and LETC as described.
4. As needed, the MAWIB will designate other partner agency staff and resources to meet the needs of individual layoff events.
5. As an ongoing concern, the MAWIB communicates with DWD JS and LETC on each Rapid Response event to ensure full participation and maintain flexibility in delivery of Rapid Response services.
6. The MAWIB evaluates funding to guarantee appropriate levels of funding for maintaining Rapid Response infrastructure to respond to the needs within the WDA.

**Manage Specific Layoff Events**

1. The MAWIB and/or Wisconsin Department of Workforce Development (DWD) receives WARN or other notice of layoff or closure.

**Attachment V: Rapid Response Policy and Procedure**

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2. The MAWIB Director of Adult Services and Business Services staff designee, makes initial contact with affected company to:
  - a) confirm content of notice,
  - b) gather general facts and other pertinent information which may not have been included in the notice; including, but not limited to, Limited English Proficient workers and workers requiring accommodations, and
  - c) arrange an initial onsite visit/meeting with company officials and other relevant parties.
3. The MAWIB Director of Adult Services organizes and manages initial onsite visit with company officials, and union officials, when applicable, to:
  - a) communicate information on dislocated worker program and other resources,
  - b) determine layoff schedule and collect additional data,
  - c) determine potential TAA applicability, and
  - d) work with impacted parties to conduct onsite/offsite worker informational meetings and other enhanced services.
4. The MAWIB Director of Adult Services identifies and requests the participation of other Rapid Response Team partners at the initial meeting, depending on the size and scope of the dislocation.
5. The MAWIB Director of Adult Services, in collaboration with other Rapid Response Team members, sets the date(s) for worker informational meetings. Rapid Response Team develops worker meeting agenda, manages logistics, and identifies speakers/resources.

Generally, worker informational meetings will include:

- a) overview of Dislocated Worker program services (including TAA, if applicable),
  - b) overview of Job Center of Wisconsin services and resources (including availability of job search assistance, labor market information, career counseling, and specialized services for veterans and individuals with disabilities), and
  - c) overview of Unemployment Insurance Compensation eligibility, benefits, and procedures.
6. The Rapid Response Team provides guidance to impacted workers on how to access Job Center of Wisconsin and assists them in online registration. Rapid Response Team distributes and collects completed Department of Workforce Development Dislocated Worker surveys.
  7. The MAWIB Director of Adult Services analyzes and summarizes worker surveys and submits surveys to DWD Dislocated Worker staff.

## Attachment V: Rapid Response Policy and Procedure

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8. The MAWIB Director of Adult Services, in consultation with other Rapid Response Team partners, arranges any subsequent worker informational meetings. Additional topics of discussion will be determined through consultation with impacted parties based on interest and need in accordance with guidelines set forth by DWD.
9. MAWIB Director of Adult Services assigns Dislocated Worker program case manager(s) to the affected group for general services and potential program enrollment. Dependent on demand, specific workshops will be developed and delivered, and may include resume development, interviewing skills, computer literacy skills, and financial literacy.
10. Local Labor Market Information is utilized to determine a strategy for re-employment for impacted workers. With the assistance from the MAWIB Business Services designee, the Rapid Response Team organizes targeted recruitment events to quickly “match” dislocated workers to current job openings.
11. Rapid Response Team oversees provision of other Job Center partner services to workers, including career assessments, career counseling, and career fairs.
12. Dislocated Worker case management staff enrolls workers into the program, provides ongoing WIOA “career services” and, when applicable, assists with training opportunities as documented in detailed career plans.
13. MAWIB Dislocated Worker program staff coordinate delivery of approved training (as listed on the state ITA list) to program participants. When applicable, Dislocated Worker program staff coordinate with TAA staff to assure seamless service delivery.
14. Rapid Response partners attend monthly Dislocated Worker conference call to share Rapid Response activities with WDBs.
15. Key MAWIB personnel work with DWD staff to secure appropriate funding levels for specific Rapid Response activities through Rapid Response, Rapid Response Additional Assistance or, when applicable criteria is met, National Dislocated Worker Grants.

### ***VI. References***

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- i. DWD Rapid Response Process Map
- ii. DWD Rapid Response Matrix
- iii. WIOA Interim Guidance
- iv. WDA-2 Process Map
- v. <http://www.dol.gov/compliance/laws/comp-warn.htm>

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***VII. Definitions***

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- DWD – Wisconsin Department of Workforce Development
- DWD JS - Wisconsin Department of Workforce Development – Job Service
- DWD UI - Wisconsin Department of Workforce Development – Unemployment Insurance Division
- LETC – AFL-CIO Labor Education & Training Center
- Rapid Response – previously known as Special Response – formal process to address layoffs affecting 25 or more workers in a single event
- TAA – Trade Adjustment Assistance - a federal program of the United States government to act as a way to reduce the damaging impact of imports felt by certain sectors of the U.S. economy. The current structure features four components of **Trade Adjustment Assistance**: for Workers, Firms, Farmers, and Communities.
- WDB – Workforce Development Board - part of the Public Workforce System, a network of federal, state, and local offices that support economic expansion and develop the talent of the nation’s workforce. Milwaukee County, serves as one of eleven WDBs across the state of Wisconsin.
- WARN - The Worker Adjustment and Retraining Notification Act (WARN) protects workers, their families, and communities by requiring most employers with 100 or more employees to provide notification 60 calendar days in advance of plant closings and mass layoffs.

Employee entitled to notice under WARN include managers and supervisors, as well as hourly and salaried workers. WARN requires that notice also be given to employees' representatives, the local chief elected official, and the state dislocated worker unit.

Advance notice gives workers and their families some transition time to adjust to the prospective loss of employment, to seek and obtain other jobs, and, if necessary, to enter skill training or retraining that will allow these workers to compete successfully in the job market.

Generally, WARN covers employers with 100 or more employees, not counting those who have worked less than six months in the last 12 months and those who work an average of less than 20 hours a week.

## Attachment V: Rapid Response Policy and Procedure

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Employees entitled to advance notice under WARN include managers and supervisors as well as hourly and salaried workers.

Regular federal, state, and local government entities that provide public services are **not** covered by WARN.





## WIOA GRIEVANCE PROCEDURE

### I. General Information

#### A. Background

The Workforce Innovation and Opportunity Act (WIOA) requires grantees to establish and maintain complaint/grievance and appeal procedures that conform to WIOA and other applicable federal and state requirements. In accordance with those requirements, Employ Milwaukee has established a grievance procedure applicable to all EMPLOY MILWAUKEE staff, program applicants and participants, and program operators. These are the procedures to use to resolve complaints/grievances and appeals regarding alleged violations of DWD grants, its related regulations, applicable Wisconsin statutes, other applicable federal or state requirements, the provisions of this document or the terms of a DWD grant agreement. WIOA Sections 181(c) and 188 are the applicable statutory citations.

#### B. Acceptance of Complaints

Program operators are required to accept complaints from staff, applicants and participants of EMPLOY MILWAUKEE funded programs according to established grievance procedures. Complaints that should be directly filed with Employ Milwaukee include:

- EMPLOY MILWAUKEE staff complaints
- Issues between Employ Milwaukee and program operators
- Issues between two or more program operators
- Issues involving Employ Milwaukee's operations
- Complaints alleging discrimination (may be sent directly to the agencies listed below bypassing EMPLOY MILWAUKEE)

**Complaints that include alleged discrimination** may also be submitted to, or submitted directly to:

**David Durán**  
**Wisconsin Dept. of Workforce Development**  
**201 East Washington Avenue, Room G100**  
**P.O. Box 7972**  
**Madison, WI 53707-7972**  
**(608) 266-6889 (voice)**  
**(866) 275-1165 (TTY)**

OR

**Director – Civil Rights Center (CRC)**  
**ATTN: Office of External Enforcement**  
**U.S. Department of Labor**  
**Room N-4123**  
**200 Constitution Avenue NW**  
**Washington, D.C. 20210**

Complaints that include alleged incidents of discrimination, which are submitted to one of the agencies named above, **may** also be cross-filed with the Equal Rights Division (ERD) of the Wisconsin Department of Workforce Development. Complaints that include alleged incidents of discrimination under the Wisconsin Fair Employment Statutes **must** be filed with the ERD:

**Equal Rights Division  
819 N Sixth Street – Room 255  
Milwaukee, WI 53203  
(414) 227-4384 (voice)  
(414) 227-4081 (TTY)**

**Complaints Alleging Incidents of Fraud and Abuse Violations of DET Funded Programs** shall be filed by completing an Incident Report form and submitting it to the DET according to the procedures on the back of the form. You may request a Wisconsin WIOA Fraud and Abuse Incident Report from the Complaint Officer. **If you fear reprisal or that your position may be compromised you may contact the Federal Office of Inspector General Hotline toll-free (800) 347-3756 or you may call DWD, David Durán, at (608) 266-6889 or (TTY) (866) 275-1165.**

**C. Limitations**

Except for allegations of fraud and abuse violations, complaints alleging noncriminal violations other than discrimination **must be filed within one year of occurrence**. Discrimination complaints **must be filed within 180 days of the alleged occurrence**. Complaints alleging a violation of The State of Wisconsin's Fair Employment Statute, 111.31-111.395, Stats., regarding discrimination **must be filed within 300 days after the alleged discrimination occurred**. Complaints filed after this time period will not be accepted.

**D. Amendments**

Written amendments that are related in law and in fact to the original complaint will be permitted up to the day of resolution. Written amendments concerning harassment due to the filing of the pending formal complaint may be included in the request for hearing. Amendments not related in law and in fact to the original complaint and amendments that substantially change the nature and scope of the complaint will be deemed new complaints.

**E. Joinder and Class Actions**

Each individual is entitled to a fair hearing. However, joinder and class actions will not be allowed, except in the rare circumstances where Employ Milwaukee Chief Executive Officer (CEO) determines that several complaints share the same operative fact situation and the same question of law, and that it would be in the interest of efficiency to grant a joint or class hearing. Failure of the CEO to join shall not be actionable grounds for complaint.

**F. Requirements**

All program operators shall:

1. Post their grievance procedure in a prominent place and ensure all program staff, applicants and participants are made aware of their rights regarding complaints, appeals, and hearings.
2. Retain on file a sample notice of the grievance procedure which may be modified to meet individual program operations.
3. Have participants sign and date a notice of rights and benefits and retain a copy of that notice in the participant's file. As an alternative, a staff person may give the participant the notice of rights and benefits and sign and date the receipt on the participant's behalf.

4. Ensure that any employer of a WIOA participant has an established grievance procedure, and that WIOA participants are made aware of their rights regarding complaints with an employer.
5. Program operators shall retain all records pertaining to a complaint for a period of three years, or beyond three years if the complaint is not resolved or is under audit or investigation.

Employ Milwaukee shall:

1. Post their grievance procedure in a prominent place and ensure all staff are made aware of their rights regarding complaints, appeals, and hearings.
2. During new employee orientation provide employee with a copy of Employ Milwaukee's grievance procedure.

## II. PROCEDURES FOR COMPLAINTS ALLEGING NONCRIMINAL VIOLATIONS OTHER THAN DISCRIMINATION

### A. Filing of a Complaint

Steps one, two, and three, below, shall take place at the program operator level if the complaint is filed by that operator's staff, applicant, or participant, and must be addressed within 12 calendar days from the filing of a written complaint, as Employ Milwaukee is required to grant a hearing within 30 days of the filing of a complaint. In the event of a complaint being filed directly with Employ Milwaukee, step one begins at Employ Milwaukee. Accordingly, each program operator must designate a Complaint Officer who will be responsible for addressing complaints. Additionally, program participants must be provided a statement of Rights and Benefits that incorporates this procedure.

<u>Steps</u>	<u>Timetable</u>
1. File Written Complaint	Day one
2. Investigation	Through day 12
3. Informal Resolution	Through day 12
4. Request for Hearing	No later than day 15
5. Hearing	No later than day 30
6. Final Local Decision	No later than day 60

#### 1. Submission of the Written Complaint

- a. Every complaint must be filed in writing, and shall be sufficiently accurate and complete to be evaluated on its own merit.
- b. The following information should be included whenever a complaint is filed:
  - i. The full name, telephone number, and address of the complainant;
  - ii. The full name and address of the respondent against whom the complaint is being made;
  - iii. A clear and concise statement of the facts, including pertinent dates, stating the alleged violation;
  - iv. Provision of WIOA or other program regulations, if known, which the complainant believes was violated;

- v. A statement disclosing whether the complaint has been cross-filed with any other jurisdiction and whether these other proceedings have been commenced or concluded, including dates, authorities, and other pertinent information; and
  - vi. A statement of the resolution which the complainant seeks.
- c. The respondent shall acknowledge receipt of a complaint in writing within 5 working days.

## **2. Investigation**

- a. The Complaint Officer must investigate the complaint to determine both the complainant's and respondent's version of the facts and to determine which provision of the law, program regulations, or contract apply. If a complaint is filed by an EMPLOY MILWAUKEE staff person, the Executive Director is responsible for the investigation and informal resolution process.
- b. The Complaint Officer prepares a written report on his or her investigation giving both the complainant and respondent a copy.
- c. The complainant is notified, in writing, that the investigation has been completed.

## **3. Informal Resolution**

- a. Complainants must be offered an opportunity to informally resolve their complaints.
- b. The Complaint Officer conducts a fact finding appointment, which is a meeting between the complainant, the respondent, and the Complaint Officer seeking to settle the complaint through informal channels. The informal resolution is strongly recommended, but is not required as a prerequisite to request a fair hearing from Employ Milwaukee.
- c. The complainant is notified, in writing, of the right to request a hearing from Employ Milwaukee within three days of the fact finding appointment if no settlement has been reached.
- d. If a settlement has been reached on any or all issues raised by the complainant, a Settlement Agreement will be executed. Employ Milwaukee has included with this grievance procedure a sample Settlement Agreement as Attachment I.

## **4. Request for Hearing**

- a. If the complainant has exhausted the program operator's complaint process and is not satisfied, then the complainant has the right to request a hearing from Employ Milwaukee. This request must take place within three days of the fact finding appointment (no later than 15 days from the filing of the written complaint). The hearing request is to be addressed to:

**Paul Wechter, Employ Milwaukee**  
**2342 N. 27<sup>th</sup> Street**  
**Milwaukee, WI 53210**  
**(414) 270-1767; TRS Relay Number 711**

- b. The request for a hearing must include a copy of the complaint and the reasons the complainant is not satisfied with the informal resolution process.
- c. Upon receipt of the complaint, Employ Milwaukee will investigate, prepare a report of facts, schedule a Grievance Committee hearing (no later than 30 days from filing date), and notify all parties.
- d. The Grievance Committee will review the staff's report, which identifies pertinent issues, and formulate appropriate questions for the hearing.

## **5. Hearing**

- a. In attendance should be the complainant, his/her representative and witnesses; the respondent, his/her representatives and witnesses; and EMPLOY MILWAUKEE staff and the members of Employ Milwaukee Grievance Committee.
- b. The hearing is open to the public, and will be tape recorded by staff.
- c. The complainant will present his/her case and the respondent or representative responds accordingly.
- d. All evidence is presented in writing or through witnesses.

#### **6. Final Local Determination**

- a. The Grievance Committee examines the evidence, laws, regulations, and policies relevant to the case.
- b. Using a consensus-based approach, the Committee issues a written decision to the complainant and respondent within 30 days of the hearing and no later than 60 days from the date the complaint was filed.
- c. The parties are informed of their right to appeal to the State of Wisconsin, DWD/DET within the following time period:
  - (1) Ten calendar days after the complainant received the decision; or
  - (2) If the complainant did not receive a decision, the complainant must file the appeal within 15 calendar days after the decision was due.

#### **B. Responsibilities of Program Operator in the Processing of Complaints**

Each Program Operator must designate a Complaint Officer to be responsible for processing complaints. That person will be responsible for:

1. Adhering to Employ Milwaukee issued Grievance Procedure and the Workforce Programs Guide, Division of Workforce Solutions, Part 1, Administration of Workforce Programs Policy and Procedure Manual, Sec. III (S);
2. Accepting written complaints and processing them within prescribed timelines;
3. Investigation of the complaint;
4. Providing the complainant with required written notices and an opportunity for an informal resolution; and
5. Maintaining a case file that includes all correspondence related to the hearing.

### **III. PROCEDURES FOR COMPLAINTS OF DISCRIMINATION**

#### **A. Filing Deadline**

Complaints must be filed **within 180 days after the alleged discrimination occurred**. An extension may be granted for good cause by the Director of the Directorate of Civil Rights (DCR). Any extension is for the administrative convenience of the Directorate and does not create a defense for the respondent.

**B. Where to File a Complaint**

The complaint may be filed with either:

**David Duran**  
**Wisconsin Dept. of Workforce Development**  
**201 East Washington Avenue, Room G100**  
**P.O. Box 7972**  
**Madison, WI 53707-7972**  
**(608) 266-6889**  
**(608) 275-1165 (TTY)**

**OR**      **Director - Civil Rights Center (CRC)**  
**ATTN: Office of External Enforcement**  
**Department of Labor**  
**Room N-4123**  
**200 Constitution Avenue NW**  
**Washington, DC 20210**

Any person who elects to file a complaint with DWD/DET (DET), shall allow DET 90 calendar days to process the complaint.

DET allows any party to a discrimination complaint to request Alternative Dispute Resolution (ADR) or mediation of their complaint. ADR allows disputes to be resolved in a less adversarial manner and is totally voluntary. The complainant may file a complaint with the Director/CRC within thirty (30) days, should ADR fail to provide a satisfactory resolution of the complaint. The Equal Rights Division of DWD will provide ADR or mediation for the parties requesting this method of resolving discrimination complaints.

If by the end of 90 calendar days DET has not completed processing the complaint, has failed to notify the complainant of the resolution or has offered a resolution not acceptable to the complainant, including ADR, the complainant may after the ninety (90) calendar days have passed, file a complaint with the Director/CRC by completing and submitting CRC's Complaint Information and Privacy Act Consent Forms. The complaint must be filed no later than thirty (30) calendar days after DET has issued a final decision or ninety days have passed. In any event the complaint must be filed with CRC no more than one hundred twenty (120) days after the complaint was initially filed.

A discrimination complaint may be cross-filed with the Equal Rights Division (ERD) of the Department of Workforce Development. If the discrimination is based on the Wisconsin Fair Employment Statutes, **it must be filed with the ERD within 300 days after the alleged discrimination took place.** It is important to note that the Wisconsin Fair Employment Statutes recognize protected classes in addition to those covered by federal Civil Rights Statutes, such as marital status, sexual orientation, source of income, etc. To file your complaint with the ERD, contact:

Equal Rights Division  
 819 N Sixth Street – Room 255  
 Milwaukee, WI 53203  
 (414) 227-4384 (voice)  
 (414) 227-4081 (TTY)

**C. Discrimination Based on State Fair Employment Statutes**

Complaints alleging a violation of Fair Employment, s. 111.31-111.395, Stats., regarding discrimination must be filed with the DILHR-ERD within 300 days after the alleged discrimination took place. Complaints filed with DOL-DCR may be cross filed with the state DILHR-ERD. Complaints filed with DILHR-ERD must be filed using ERD Discrimination Complaint Form .

**IV. PROCEDURES FOR REPORTING FRAUD, PROGRAM ABUSE, AND CRIMINAL CONDUCT**

[See also Sec. I (B) above.]

Detailed reporting procedures are provided in the Workforce Programs Guide, Division of Workforce Solutions, Part 1, Administration of Workforce Programs Policy and Procedure Manual, Sec. III (S) (5) and (6), and those procedures shall be used to report any incident of fraud, program abuse, or criminal conduct in the WIOA program, which is available upon request from the Complaint Officer.

The Department of Labor, in conjunction with the Office of Inspector General (OIG), has established a nationwide system to report any suspected or actual incident of fraud and/or program abuse. Under this system, the following procedures will apply.

1. Individuals who become aware of any allegation or complaint/grievance about possible fraud, misfeasance, nonfeasance, or malfeasance, misapplication of funds, gross mismanagement and employee or participant misconduct involving DET grant programs or operations should report that information as follows:

(a) Staff of WDAs or statewide grantees shall within one working day, file an Incident Report using the DET Grant Fraud and Abuse Incident Report form and submit it to DET according to procedures on the back of the form.

(b) Staff of program operators other than WDAs or statewide grantees or members of the public may report suspected incidents of fraud and abuse either to the local WDA Administrative Entity or to DET.

(c) It is not the intent of the DOL or DET to limit use of the Incident Report to elicit information only after an act or allegation has already been determined legally prosecutable. On the contrary, any act which raises questions concerning possible illegal expenditures or other unlawful activity should be reported immediately.

2. **Complainants who fear that their positions will be compromised** if they submit information through the WDA/DET reporting system may send an Incident Report directly to:

**Office of Inspector General  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Room S-5506  
Washington, D.C. 20210**

or **telephone OIG's hotline** that is maintained for public use by individuals who want to report a suspected wrongdoing. The toll free number is **(800) 347-3756**. The OIG is required to respond to hotline referrals within 30 days.

3. The identity of individuals who provide information will not be disclosed unless they consent or the OIG determines that disclosure is unavoidable during the course of an investigation. The DOL prohibits reprisal against any employee who discloses information about wrongdoing or makes a valid complaint/grievance. Wisconsin's "Whistle Blower Law" provides similar protection for most state employees (230.80-230.89, Stats. & 895.65, Stats.)



## **Customized Training Policy**

**Effective July 1, 2017**

### **Background**

Customized training is designed to meet the special requirements and specific training needs of an employer or group of employers. Under the terms of a customized training contract, the employer agrees to pay for a significant cost of the training and to employ the participant upon successful completion of training. Customized training may be developed for an employer who is hiring new employees as well as those currently employed by the employer.

### **Policy**

#### **A. Selection of Participants for Customized Training**

At a minimum, an individual must receive at least one individualized career service, such as development of an individual employability plan with a case manager or individual counseling and career planning, before the individual may receive training services. An individual referred by an employer, including those who may already be employed by the employer, may be considered for customized training only after meeting eligibility requirements. In addition, the case file must contain a determination of need for training services as identified in the individual employment plan, comprehensive assessment, or through any other individualized career service received.

#### **B. Customized training can be offered to eligible incumbent workers under the following conditions:**

1. The employed individual is not earning a self-sufficient wage, or wages comparable to or higher than wages from previous employment as determined by Employ Milwaukee, Inc. (EMI).
2. It is designed to meet the special requirements of the employer(s), includes a commitment to employ an individual upon successful completion of the training, and the employer pays for a significant cost of the training as determined by EMI (see Section I. of this policy).
3. The training relates to the introduction of new technologies, new products or service procedures, upgrading to new jobs that require new skills, workplace literacy, or other purposes identified by EMI.



### C. Selection of Employers for Customized Training

Potentially eligible employers able to participate in customized training contracts include: private-for-profit businesses, private non-profit organizations, and public sector employers.

EMI will ensure that customized training contracts are not written with employers who have failed to provide agreed upon employment to previous participants completing required training. EMI will take into consideration an employer's past history with any Customized and On-the-Job Training contracts, finances, layoffs, relocations, labor disputes, as well as the occupational and industry outlook, as a basis for assessing an employer's viability for customized training contracts.

Customized training contracts shall not be written to provide skills for temporary or intermittent employment.

### D. Occupational Eligibility

Customized training is allowable for occupations which are consistent with the participant's capabilities, are in demand occupations which will lead to employment opportunities, as defined below, enabling the participant to become economically self-sufficient and which will contribute to the occupational development and upward mobility of the participant on a career pathway.

Occupations selected for customized training shall meet, at the time of completion or per company policy, the following:

1. Full time permanent positions (minimum of 32 hours per week);
2. All participants shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. This will include unemployment compensation where the employer is normally required to provide such coverage to its employees.
3. The position provides the participant benefits per company policy that have a monetary value (i.e., insurance, paid leave, profit sharing) other than those required by law.

Occupations under which individuals may not participate in customized training include, but are not limited to the following:

1. Occupations depending on commission as the primary income source.
2. Professional occupations requiring licenses.
3. Occupations dependent on tips or gratuities as the primary income source.

4. An occupation that is not sufficiently skilled to normally require a training period of at least six weeks.

#### E. Pre-Award Review

Prior to the development of a customized training contract, a pre-award review will be conducted to ensure that a business, or part of a business has not relocated from another location in the U.S., if the relocation results in any employee losing his or her job at the original location.

#### F. Customized Training Contract

The length of the training will be determined by an assessment of the job difficulty, the minimum participants' skills, education, previous work experience, as identified by the employer, job accommodations that may be required, and discussions with the employer. Information gathered is used to design a training outline that will become the work statement of the agreement and followed as a guide when delivering the training. The customized training agreement will identify the occupation(s), the skills and competencies to be learned, and the length of time the training will be provided. In addition, the agreement should identify the total cost of the training (including those costs associated with accommodations, e.g. new software for such things as speech recognition, modified workstations, and workplace supports such as job coaching), which costs are extraordinary for the employer and thus will qualify as in-kind, and what must be paid by the employer in cash.

The employer may contribute in-kind costs to replace their cash contribution if the in-kind costs are above and beyond what the employer normally spends on training and operations. These costs must be specifically related to the customized training. As indicated in the examples below, the value of any asset or material that is retained by the employer after the training may is not permitted as an in-kind cost.

Examples are:

1. Training rooms – If the employer had to rent a “special” room in which to specifically conduct the customized training versus one that is routinely available and requires no additional payment by the employer. That “special” room could count as in-kind costs because it is an extraordinary expense to the employer and is directly associated to the customized training.
2. Training materials – If these materials are developed specifically for the customized training and are not in the employer's possession for use after the training occurs, they may count as an in-kind contribution by the employer.
3. Training equipment – If additional equipment is purchased for the customized training, it cannot count as in-kind since the equipment would be a part of the employer's assets/inventory.

These in-kind contributions will be documented in the files just as cash contributions are for future audit purposes.

Customized training contracts will specify:

1. Name and address of requesting organization, business, or agency
2. Contact official, title, and telephone number
3. Cost of the proposed training
  - Total cost of the training
  - Total WIOA funds requested
  - Total employer contribution (described in detail)
4. Description of proposed training
  - Need for training
  - Occupational demand for trained individuals
  - Type of training to be provided
  - Length of proposed training
  - Location of training site
  - Target group for training
  - Number of individuals to receive training
5. Training Plan
  - Objectives of the training
  - Specific skills to be learned
  - Method of instruction
  - Measurement of objectives and skill attainment of trainees
6. Qualifications of training staff
7. Employer involvement and commitment
  - Curriculum design meeting needs of employer
  - Commitment of the employer to employ participants who successfully complete the training
8. Budget
  - Provide a narrative explaining how the funds will be utilized
  - Provide an itemized budget
9. Special health or safety equipment or precautions required, if any
10. Special tools or uniforms required, if any, and whether or not the employer will supply them.

Customized training contracts are to contain appropriate assurances and certifications including:

1. Compensation for the participant at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills. Such rates may not be less than the highest of the federal or State minimum wage.
2. Provision of benefits and working conditions at the same level and extent as other employees of similar longevity and doing the same type of work. This will include unemployment compensation coverage where the employer is normally required to provide such coverage to employees. The employer must also secure worker's compensation or other insurance coverage for work-related injury of trainees.
3. Maintenance, retention, and access to records by the WDB, State, and Department of Labor personnel to support the training activity and associated reimbursements, i.e., time and attendance records, payroll records, invoice and reimbursement documents, and other information necessary to respond to monitoring reviews or audits (documentation of extraordinary costs are not required).
4. Prohibition on the use or proposed use of WIOA funds as an inducement to a business or part of a business to relocate if the relocation results in any employee losing his/her job at the original location, if the original location is within the United States.
5. Prohibition on the use or proposed use of WIOA training funds on any business or part of a business that has relocated from any location in the U.S., until the company has operated at the new location for 120 days, if the relocation resulted in any employee losing his/her job at the previous location.
6. A customized training contract cannot infringe upon the promotion of or displacement of any currently employed worker or a reduction in their hours.
7. Prohibition that the same or a substantially equivalent position is open due to a hiring freeze.
8. All customized training positions must be additions to the employer's workforce that would otherwise not be financed by the employer without financial assistance under WIOA (maintenance of effort).
9. No participant shall be employed or job opening filled when the employer has terminated the employment of any regular employee or otherwise reduced its workforce with the intention of filling the vacancy so created by hiring a participant whose training is subsidized under this Act.
10. Prohibition on customized training contracts if any person in the same or substantially equivalent position is on layoff, involved in a work stoppage or on strike.
11. No customized training contract shall impair: (a) existing contracts for services; or (b) existing collective bargaining agreements, unless the employer and labor organization concur in writing with respect to any elements of the proposed activities which affect such agreement.
12. Assurance that adequate supervision will be provided at all time while the trainee is participating in the customized training.
13. Health and safety standards under Federal and State law equally applicable to customized training participants.
14. The employer must comply with civil rights law and regulations, including non-discrimination.
15. Prohibition on use of funds to assist, promote, or deter union organizing.
16. Prohibition against political activity and lobbying.

17. No officer, employee or other agent of the employer shall recommend hiring, decide hiring, establish salary/wage rate, or provide preferential supervisory treatment with respect to a trainee who is a member of the officer's, employee's or agent's immediate family.
18. Prohibition from being employed in the construction, operation or maintenance of any facility that is used for religious instruction or worship.
19. Prohibition on the use of funds for construction except for provision of reasonable accessibility and accommodation.
20. Modification conditions and requirements.
21. Contract termination conditions.

#### G. Determining Length of Training

Customized training will be limited to the period of time required for the participants to become proficient in the occupation for which the training is being provided. The amount of training hours needs to take into account the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employability plan. The contracted training hours cannot include those types of training normally provided by the employer for new employees such as orientation to the job/business, safety procedures, etc. Training guides, such as provided in ONET, the SVP and others, can be used to help determine the length of training.

#### H. Developing the Training Plan

The customized training contract will include a training plan. The training plan, including skills to be learned and the time necessary to learn each skill must be sufficiently specific to permit verification that training was provided in accordance with the contract. The following guidelines apply to the development of a training plan:

- Activities (the work statement) must be described clearly to show that the employer is obligated to conduct training.
- Skills to be learned (measurable) should be separately listed with training times estimated for each.
- Training times must be reasonable.
- Training times must be geared to both the complexity of the job and the abilities of the trainee.
- The training outline must identify the job title of the person(s) responsible for the training.
- The training outline must include measurement and evaluation procedures.
- The trainee, supervisor, and/or trainer should be knowledgeable about its contents.

#### I. Employer Match Requirement

The employer is required to pay a significant portion of the cost of the training, as determined EMI (the local board). Factors used to determine "a significant portion of the cost of the training" may include, but is not limited to, the size of the employer, the number of participants in the training, wage and benefit levels of the employees (at the beginning and anticipated upon completion of the training), the

relationship of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities.

When the training consists solely of incumbent workers, employers are required to pay the non-WIOA (non-federal) share of the cost of providing training to their incumbent workers. (WIOA Sections 134(d)(4)(C) and 134(d)(4)(D) and 20 CFR 680.820).

The employer non-WIOA (non-federal) share is based on the size of the workforce (wages paid to the participant while in training can be included as part of that share and the share can be provided as cash or in-kind that is fairly evaluated) as follows:

- At least 10 percent of the cost for employers with 50 or fewer employees
- At least 25 percent of the cost for employers with 51 to 100 employees
- At least 50 percent of the cost for employers with more than 100 employees

If the customized training consists of both incumbent workers and participants who are not incumbent workers, EMI will determine the appropriate employer cost applying the factors for each category proportionately.

When determining the funding source for customized training, EMI will use the appropriate program funds for the appropriate WIOA-eligible population. EMI may provide customized training to low-income and eligible employed adults with WIOA Adult funds, and may provide customized training to dislocated workers with WIOA Dislocated Worker funds. Customized training provided with statewide funds must serve WIOA eligible individuals.

### **Payment to Contractor**

EMI will pay the contractor the balance of the training costs not covered by the employer's share.

### **Monitoring**

EMI will monitor all customized training contracts in accordance with our monitoring policies and procedures to ensure that:

1. The training plan has measurable indicators of performance.
2. Evaluation of those indicators will occur to determine if skills identified in the training plan have been acquired.
3. Onsite visit(s) and other monitoring are conducted during the course of the training to determine compliance with WIOA requirements, progress toward completion of the training plan and to resolve issues for the employer and/or participants.

**Performance**

EMI will provide the State an annual narrative to:

- Identify what sector partnerships were involved in training activities as part of the Industry Sector Partnership Initiative as well as the employer size;
- Discuss whether the sliding scale was effective for increased employer participation, and if the training helped the employer maintain a competitive advantage; and
- What/how were the factors that contributed to the success of these programs.

**Automated System Support for Employment and Training (ASSET) and Efforts to Outcomes (ETO) Reporting**

All participants will be appropriately recorded in ASSET and ETO.

In ASSET, the customized training service can be found in the Manage Services Menu. For adults and dislocated workers, the service is a Training Service.

In ETO, when the training record is entered, Customized should be selected. If the employer/provider is not listed in the drop down menu, a request should be made to the EMI data department to add it.



## **Employ Milwaukee** **Incumbent Worker Training Policy**

**Effective July 1, 2017**

### **Purpose**

To establish local policy for providing services to incumbent workers under federal and state grants and the Workforce Innovation and Opportunity Act (WIOA) to identify the requirements for One Stop Operators and service providers to adhere to in providing such services to adults, dislocated workers, and youth.

### **Background**

The Incumbent Worker Training (IWT) program provides both employees and employers with the opportunity to build and maintain a quality workforce. The IWT program can be used to help avert potential layoffs of employees, or to increase the skill level of employees so they can be promoted within the company and create backfill opportunities for the company.

To qualify as an incumbent worker, the employee must [20 CFR §680.780]:

- Be directly employed by the company.
- Meet the Fair Labor Standards Act requirement for an employer-employee relationship, and
- Have an established employment history with the employer for 6 months or more unless the training is provided to a cohort of employees in which case a majority of those employees meet the employment history requirement.
- However, an incumbent worker does not have to meet the eligibility requirements for career and training services for adults and dislocated workers under WIOA, unless they also are enrolled as a participant in the WIOA adult or dislocated worker program.

Additionally, the incumbent worker must:

- Reside in Milwaukee County, under WIOA; or reside in Milwaukee, Waukesha, Ozaukee, Washington, Walworth, Racine, or Kenosha Counties, under the federal TechHire grant.
- Be at least 18 years of age.
- Work at least 32 hours per week.
- Earn an hourly wage above the state minimum wage.
- Agree to cooperate with the data collection requirements.

The training must satisfy the requirements of WIOA and other federal grant regulations and increase the competitiveness of the employee or business.



**Policy**

Employ Milwaukee supports the use of a maximum of 20 percent of the funds allocated under WIOA §133(b) [Adult Employment and Training Activities and Dislocated Worker Funds] to pay for the Federal share of the cost of providing training through a training program for incumbent workers based upon eligibility [WIOA §134 (d)(4)(A)(i)].

Agreements with businesses regarding worker training must be in writing and must ensure that all participants are provided a structured training opportunity by which to gain the knowledge and competencies necessary to retain employment and avoid lay-offs.

**Employer Eligibility Criteria:**

The IWT Program does not limit the kinds of training that businesses may request. Training may include industry or business-specific skills, technical and computer skills, and/or “soft skills,” such as leadership and management training.

When determining the eligibility of an employer to receive IWT funding, Employ Milwaukee shall consider [WIOA §134(d)(4)(A)(ii)]:

- the characteristics of the employee participating in the training,
- the relationship of the training to the competitiveness of a participant and the employer;
- the number of employees participating in the training, the wage and benefit levels of those employees (at present and anticipated upon completion of the training), and the existence of other training and advancement opportunities provided by the employer

In addition, an eligible business for IWT must:

- Reside in Milwaukee County, under WIOA; or reside in Milwaukee, Waukesha, Ozaukee, Washington, Walworth, Racine, or Kenosha Counties, under the federal TechHire grant.
- Be in continuous operation for the 12 months immediately prior to the application submittal.
- Demonstrate training is linked to in-demand occupation(s).
- Demonstrate training will not only improve the skills of employees but also improve the business’s processes and competitiveness and/or avert a layoff.
- Demonstrate training will result in an industry recognized certificate or credential.
- Agree to cooperate with the data collection requirements.
- Training is for a group of businesses, although not required.
- Training is for a group of employees and not individual training at the business, although number of employees in the company will be taken into consideration.
- Training is provided by a registered training provider, although not required.

IWT program funds are limited, and are therefore awarded as funds are available. The maximum award amount is \$5,000 per participant per program year.\* The maximum duration for an IWT is 6 months s.

*\*Maximum award may be adjusted based upon funding availability each program year.*

The Governor or State board may also make recommendations to the local board for incumbent worker training that has a statewide impact [per WIOA §134(d)(4)(A)(iii)].

The training activities for incumbent workers shall be carried out by Employ Milwaukee in conjunction with the employer, or groups of employers, of incumbent workers (which may include employers in partnership with other entities for the purposes of delivering training) for the purpose of assisting such workers in obtaining the skills necessary to retain employment or avert layoffs [per WIOA §134(d)(4)(B)].

**Employer Share of Training Costs/Responsibilities:**

Employers participating in incumbent worker training are required to pay the non-WIOA (non-federal) share of the cost of providing training to their incumbent workers. [WIOA §134(d)(4)(C) and §134(d)(4)(D) and 20 CFR §680.820].

The employer share is based on the size of the employer's workforce (not on nationwide employer size). Wages paid to the participant while in training can be included as part of that share and the share can be provided as cash or in-kind that is fairly evaluated. The employer share is as follows:

- At least 10 percent of the cost for employers with 50 or fewer employees
- At least 25 percent of the cost for employers with 51 to 100 employees
- At least 50 percent of the cost for employers with more than 100 employees

Business(es) will keep accurate records of the project's implementation process and certify that all information provided, for the purpose of requesting reimbursements and reporting training activity, is accurate and true, including evidence that the business has paid the training expenses in accordance with the terms of the agreement prior to requesting reimbursement of allowable training costs.

All IWT grants are subject to WIOA and other federal grant reporting requirements and performance standards. The business must submit copies of all credentials, certificates of completion, or other documentation of the employee's participation within 30 days of the end of training to be considered eligible for reimbursement. Other criteria such as proof of wage increase or promotion is required, if applicable.

**Restrictions:**

- Funds may not be used to directly or indirectly assist, promote, or deter union organizing [20 CFR §680.830].
- Funds may not be used to directly or indirectly aid in the filling of a job opening which is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage [20 CFR §680.840].
- Funds provided under WIOA cannot be used to pay the wages of incumbent worker employees during their participant in an economic development activity provided through a statewide workforce development system [WIOA §181(b)(1)].
- When a relocation of a business results in the loss of employment of any employee of such business, no funds provided for employment training can be used for incumbent worker training until after 120 days has passed since the relocation that caused the loss of employment at an original business location in the United States [WIOA §181 (d)(1)].
- Businesses administering a current Wisconsin Fast Forward and/or Workforce Advancement Training (WATS) grants, or similar grants, are not eligible to receive IWT funds.
- Funds will not be used to cover training supplies, employer wages, books, etc.

**Examples of Acceptable Trainings:**

- Training to gain or maintain an industry recognized certificate/credential.
- Human Resource (HR) Certification (e.g., PHR, SPHR, GPHR, or SHRM). Please note that an HR training credential must be attained and a copy of the certification will be submitted within 30 days of completion.
- CD-10 training – training that teaches coding professionals how to become proficient in the ICD-10-CM and ICD-10-PCS coding or other similar systems.
- Training for improved process efficiency as identified by industry professionals.
- Training from a national, regional, or state trade association that offers an independently certified training curriculum and testing.
- Training provided in conjunction with the purchase of a new piece of equipment.
- Upgrade of computer skills (e.g., Microsoft Excel, Access).
- Seminars/workshops/webinars are eligible, however, they must have an assessment or “test” tied to it to be eligible for this program. Businesses must indicate in the application what assessment of skills is included for this type of training to justify it will improve economic competitiveness. Failure to include this may exclude the application from consideration.
- English Language Learning for managers or staff to enable them more effectively communicate with limited English employees.

**Examples of Unacceptable Trainings (this is not a definitive list):**

- Required/regulatory training – training mandated by any other public agency or department is not eligible. These trainings may include, but are not limited to, EPA, Hazardous Waste, FDA, Workers Compensation, OSHA, etc.
- Training costs associated with professional fields in which continuous education is necessary to retain professional certification, such as Certified Public Accountants, degreed medical professionals, insurance providers, attorneys, etc.
- Training which would result in advanced degrees such as associate, bachelor, master, or doctorate.
- IWT already being reimbursed by another state or federal training program (e.g., Other Workforce Development Boards, National Emergency Grants, etc.).
- Training that leads to a professional license (e.g., doctors, lawyers, CPA accountants, etc.).
- Employee travel, food, or lodging costs related to program participation.
- Wages of trainees while being trained.
- Purchases of capital equipment or other durable (long lasting/reusable) training materials/equipment.
- Training in sectarian activities.

**Definitions**

Incumbent worker – An individual who is employed, meets Fair Labor Standards Act requirements for an employer-employee relationship, and has an established history with the employer for 6 months or more. [20 CFR §680.780]

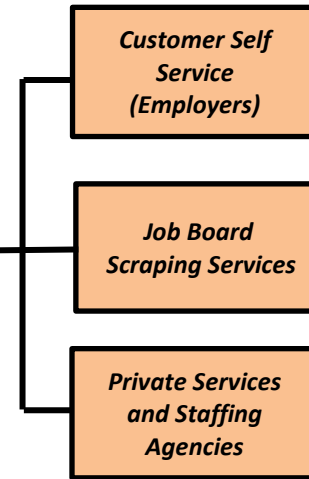
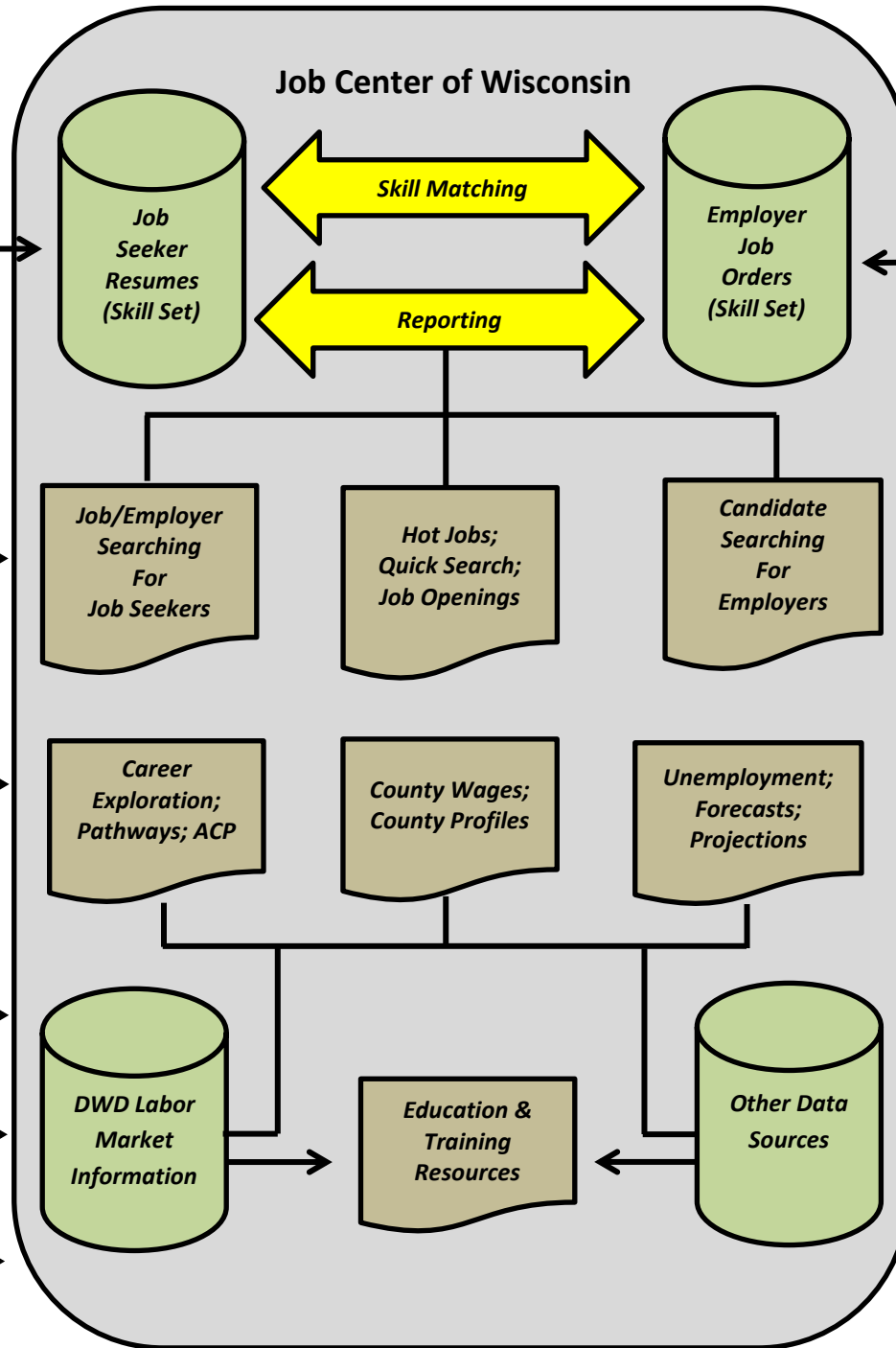
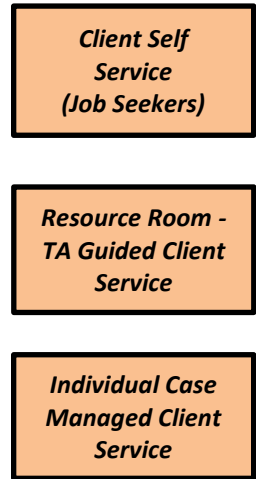
Incumbent worker training – Training designed to meet the special requirements of an employer (or group of employers) to retain a skilled workforce or avert the need to lay off employees by assisting workers in obtaining the skills necessary to retain employment. The training is conducted with a commitment by the employer to retain or avert the layoffs of the incumbent worker(s) trained. [20 CFR §680.790]

In-Demand Industry Sector or Occupation – In general:

- An industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or
- An occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.

**Attachment Z: Employ Milwaukee WIOA Implementation Concept Map – Title I and OSO services – Title III Job Service - Local WDB Programs and Services**

**Process Tip:** WIOA program clients may be eligible to participate in other Employment & Training programs offered by EMI or our partners. When WIOA funds are used by clients to participate in other federal, state or local workforce programs, the client is considered “co-enrolled”. These clients may be eligible to receive WIOA Title I-IV client or career services and utilize WIOA training funds when also registered for non-WIOA programs. The Program staff and/or CFO will notify service providers and partners when co-enrollment of clients is authorized. For certain grant related initiatives, EMI may be required to “leverage” funds from other funding sources to serve as match funds where clients may be registered in multiple programs.

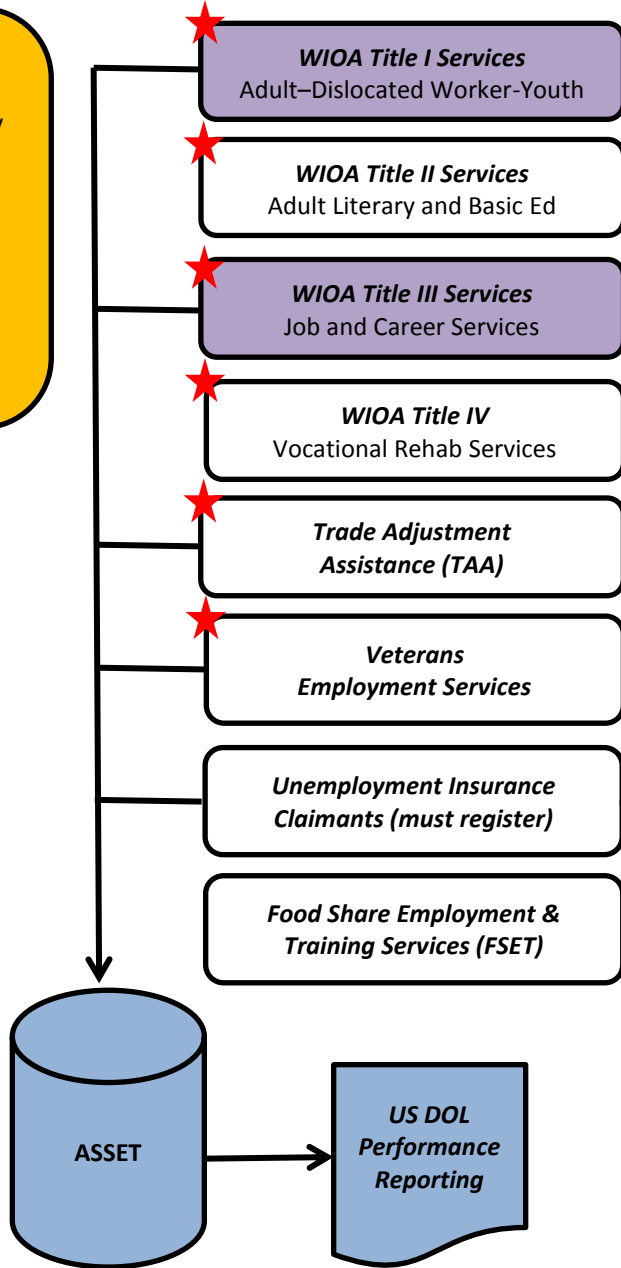


**Process Tip:** The Business Service team connects regional employers, Chambers of Commerce, business associations and other talent demand sources to regional job seekers/WIOA clients within JCW and ETO. The Fulfillment Center Process completes job placement transactions for EMI. Services include job seeker recruitment events, customized hiring events, career fairs, apprenticeship program recruitment/promotion (registered and Youth), employer surveys, job scans, LMI analysis. Industry Advisory Boards (IABs) define employer requirements (skills, occupations, credentials) and opportunities (job orders, apprenticeship programs, upskilling, reentry).

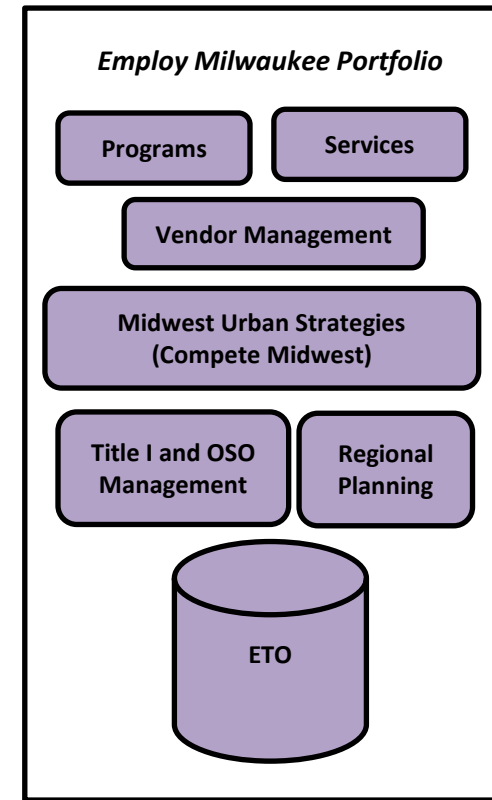
**Business Rules**  
 Every job seeker engaged in an Employ Milwaukee program or service should be enrolled in Job Center of Wisconsin with a resume.  
 Every WIOA client must be enrolled in ASSET to enable DWD performance report to US DOL.

**Workforce Facts**  
 + The Governor appoints a state workforce board (Council on Workforce Investment) to oversees the operation of the state’s workforce system.  
 + The CWI Strategic Plan outlines twenty-one strategic action items that shape policy and initiatives.  
 + WIOA defines the members who constitute the state and local workforce development boards.  
 + The WIOA State Plan was approved in October 2016.

★ = included in WIOA State Plan



- WIOA One-Stop Delivery System**
- Comprised of a network of both comprehensive and affiliate job centers
  - Includes six core programs (Title 1 through IV programs)
  - Integrates service delivery across all programs and enhances access to program services
  - Each one-stop partner provides 1 or more programs, services or activities
  - Job centers can be physical locations or an electronically or technologically linked access point; electronic means must improve efficiency of services
  - Ensure individuals can access career services regardless of where they initially enter the statewide workforce development system (common intake)
  - May have specialized centers to address client special needs



**Business Rules**  
 Every program and service will be assigned a process owner and will be incorporated into a process map prepared by the Product Management Office (PMO).  
 Midwest Urban Strategies initiatives will require client-performance metrics for all participating partners.

**Workforce Facts**  
 + Employ Milwaukee is the WDA #2 local Workforce Development Board (Milwaukee County).  
 + The **Product Portfolio** contains the inclusive list of Programs and Services and identifies process owners, product family assignments, funding sources and ETO program names.  
 + WIOA regional planning initiatives are designed in partnership with the WOW Workforce Development Board.  
 + **ETO** is the agency performance management system to track program and service outcomes and to create managerial, operational and fund development reports.

**Wisconsin WIOA State Plan** – written by DWD and approved by Governor  
**Employ Milwaukee WIOA Local Plan** – submitted to DWD and Council on Workforce Investment (CWI)  
**Title I service provider and One-Stop-Operator contracts** – competitively procured for length of up to 4 years

## WISCONSIN JOB CENTER SYSTEM GUIDANCE

- The publicly funded workforce system envisioned by WIOA is quality-focused, employer-driven, customer-centered, and tailored to meet the needs of regional economies. It is designed to increase access to, and opportunities for, the employment, education, training, and support services that individuals need to succeed in the labor market, particularly those with barriers to employment. It aligns workforce development, education, and economic development programs with regional economic development strategies to meet the needs of local and regional employers, and provide a comprehensive, accessible and high-quality workforce development system. This is accomplished by providing all customers access to high-quality one-stop centers that connect them with the full range of services available in their communities, whether they are looking to find jobs, build basic educational or occupational skills, earn a postsecondary certificate or degree, or obtain guidance on how to make career choices, or are businesses and employers seeking skilled workers.
- The one-stop delivery system includes six core programs (Title I adult, dislocated worker, and youth programs; Title II adult education and literacy programs; Title III Wagner-Peyser program; and Title IV vocational rehabilitation program), as well as other required and optional partners identified in WIOA. Under WIOA, one-stop centers and their partners:
  - ✓ provide job seekers with the skills and credentials necessary to secure and advance in employment with family-sustaining wages;
  - ✓ provide access/opportunities to all job seekers, including individuals with barriers to employment, such as individuals with disabilities, to prepare for, obtain, retain, and advance in high-quality jobs and high-demand careers;
  - ✓ enable businesses and employers to easily identify and hire skilled workers and access other supports, including education and training for their current workforce;
  - ✓ participate in rigorous evaluations that support continuous improvement of one-stop centers by identifying which strategies work better for different populations; and
  - ✓ ensure that high-quality integrated data is available to policymakers, employers, and job seekers so they are able to make informed decisions.
- **Career services** consist of three types:
  - Basic career services
  - Individualized career services
  - Follow-up services – for up to 12 months after first day of employment

- **Individualized career services:**
  - ✓ Comprehensive and specialized assessments of skill levels and service needs of adults and dislocated workers
  - ✓ Development of an individual employment plan
  - ✓ Group counseling
  - ✓ Individual counseling
  - ✓ Career planning
  - ✓ Short-term pre-vocational services
  - ✓ Internships and work experiences that are linked to careers
  - ✓ Workforce preparation activities
  - ✓ Financial literacy services
  - ✓ Out-of-area job search assistance and relocation assistance
  - ✓ English language acquisition and integrated education and training programs

- **Basic career services:**
  - ✓ Eligibility determinations for I-B programs
  - ✓ Job Center outreach, intake (including profiling) and orientation
  - ✓ Initial assessment of skill levels, (including literacy, numeracy, and English language proficiency) aptitudes, abilities (including skills gaps), and supportive service needs
  - ✓ Labor exchange services
  - ✓ Referrals to and coordination with other programs and services
  - ✓ Provision of workforce and labor market employment statistics information
  - ✓ Provision of information on ETP performance and related program costs
  - ✓ Provision of information about local area achievement in performance measures and OSO performance
  - ✓ Information and referrals to supportive services or assistance
  - ✓ Provision of information and assistance regarding filing claims for UI
  - ✓ Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA

- TRAINING SERVICES MAY INCLUDE: [Ref: WIOA 134(d)]**
- occupational skills training, including training for nontraditional employment;
  - on-the-job training;
  - incumbent worker training;
  - programs that combine workplace training with related instruction, which may include cooperative education programs;
  - training programs operated by the private sector;
  - skill upgrading and retraining;
  - entrepreneurial training;
  - transitional jobs;
  - job readiness training provided in combination with services described in any of clauses (i) through (viii);
  - adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in any of clauses (i) through (vii); and
  - Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

- Business Services May Include [Ref: WIOA Section 134(d)(1)(A)]**
- a) Certain career services must be made available to local employers, specifically labor exchange activities and labor market information.
  - b) Customized business services may be provided to employers, employer associations, or other organizations;
    - Customized screening and referral of qualified participants in training services to employers
    - Customized services to employers, employer associations
    - Customized recruitment events and related services for employers including targeted job fairs;
    - Human resource consultation
    - services, including but not limited to
      - assistance with: Writing/reviewing job descriptions and employee handbooks; Developing performance evaluation and personnel policies; Creating orientation sessions for new workers; Honing job interview techniques for efficiency and compliance; Analyzing employee turnover; Creating job accommodations and using assistive technologies; or Explaining labor and employment laws to help employers comply with discrimination, wage/hour, and safety/health regulations;
    - Customized labor market information for specific employers, sectors, industries or clusters; and
    - Other similar customized services.
  - c) Local areas may also provide other business services and strategies that meet the workforce investment needs of area employers; Allowable activities, consistent with each partner’s authorized activities, include, but are not limited to:
    - Developing and implementing industry sector strategies (including strategies involving industry partnerships, regional skills alliances, industry skill panels, and sectoral skills partnerships)
    - Customized assistance or referral for assistance in the development of a registered apprenticeship program;
    - Developing and delivering innovative workforce investment services and strategies for area employers, which may include career pathways, skills upgrading, skill standard development and certification for recognized postsecondary credential or other employer use, and other effective initiatives for meeting the workforce investment needs of area employers and workers;
    - Assistance to area employers in managing reductions in force in coordination with rapid response activities and with strategies for the aversion of layoffs, which may include strategies such as early identification of firms at risk of layoffs, use of feasibility studies to assess the needs of and options for at-risk firms, and the delivery of employment and training activities to address risk factors;
    - The marketing of business services to appropriate area employers, including small and mid-sized employers; and
    - Assisting employers with accessing local, State, and Federal tax credits.
  - d) All business services and strategies must be reflected in the local plan, described in § 679.560(b)(3)



**Employ Milwaukee’s Performance Levels (Accepted)**  
**Program Year 17**

The below performance targets were proposed by the Wisconsin Department of Workforce Development and accepted by Employ Milwaukee on June 21, 2017. Upon final confirmation from DWD, these targets will be the WIOA Title I Performance Levels for PY17.

<b>WDA2 PY17 Performance Targets</b>	
<b>Common Measure</b>	<b>Performance Target</b>
Adult Q2 Unsubsidized Employment	65%
Adult Q4 Unsubsidized Employment	62%
Adult Median Earnings	\$4,000
Adult Credential Attainment Rate	60%
Dislocated Worker Q2 Unsubsidized Employment	70%
Dislocated Worker Q4 Unsubsidized Employment	70%
Dislocated Worker Median Earnings	\$6,100
Dislocated Worker Credential Attainment Rate	50%
Youth Q2 Employment/Education	60%
Youth Q4 Employment/Education	63%
Youth Credential Attainment Rate	60%