

Certification Requirements for Comprehensive Job Centers draft (11/4/05)
(Comments made during the public review and comment period
ending 11/21/05 are in italics)

Introduction

The Workforce Investment Act requires each Workforce Development Area to have at least one comprehensive, physical Job Center. The required comprehensive Job Center can be supplemented by a network of affiliated sites that can provide one or more partner programs; a network of Job Center partners providing services that are linked to affiliated sites; or specialized centers.

Workforce Development Boards (WDBs) are responsible for certification of comprehensive Job Centers. The following requirements are intended to increase service consistency among Wisconsin Job Centers, to focus Job Centers on being more demand-driven, and to provide WDBs parameters for comprehensive Job Center certification.

- *We absolutely want to provide demand-driven services as efficiently as is feasible in order to enable local citizens to fill the needs of a competitive economy and to create quality lives for themselves. To this end we cooperate and collaborate with each other to use program funds proactively to create a tightly woven synergism resulting in the leveraging of each program's funds.*

Requirements

1. The Job Center has a credentialed employment counselor scheduled on site each week.
 - *This requirement should read: The Job Center has a credentialed employment counselor on site as needed. To make a credentialed employment counselor come to each Job Center weekly without a need would not be cost effective or efficient, especially in small Job Centers where a counselor might not need to come every week.*
 - *I think that employment counseling should be expected in a comprehensive job center system. It could save a lot of money by preventing training people for jobs that aren't available or that they won't succeed at. What if the counselor was stationed at another site and communicated using technology?*
 - *This is possible given the change in Linda's status.*
 - *Definition of Credentialed employment counselor needed. Is that in addition to customer service specialists?*
 - *What do you consider a credentialed employer counselor, what credentialing or certification is accepted?*
 - *"A credentialed employment counselor scheduled on-site each week." Having services provided by a competent "counselor" is a positive service enhancement. However, what is a credentialed employment counselor? Is this a Master degreed counselor or a certified NAWDP professional who counsels clients? We are not aware of a credentialed employment counselor providing service at any of the current Southwest Job Centers. Also, the counselor must be scheduled on-site. Is there a minimum amount of time the counselor must be on-site? This whole requirement is vague and needs clarification*
 - *A concern was raised on how it is defined.*
 - *We need a definition of "credentialed" and "counselor" as counselor refers to a person with a Masters Degree in Counseling at our locations (all our One Stops are on Technical College Campuses).*
 - *Question to the State – is there any specifications for who must sponsors these positions. Example — can these positions be a combination of DVR certified*

Counselors, Technical College Counselors, Job Service, etc.

- *Are Job Service Careers Counselors in the Careers Counselor series the only positions that count or does this include persons who have degrees or Certificates but are not in the Counselor Series.*
 - *If we are considering only Job Service Counselors and Job Service is determining in which Centers this staff will be placed isn't then Job Service determining which Centers will be comprehensive instead of the Workforce Development Board?*
 - *Define "credentialed employment counselor. Please do not assume that this is a Job Service Counselor. Many Job Centers have a variety of agencies with qualified counselors. We should not be subject to the Job Service system.*
2. The Job Center will be open at least 4 hours during non-traditional business hours to ensure that employed job seekers may have access to services.
- *I've tried this twice, in Shawano and in Marinette and it didn't work well. It is a staffing nightmare. I understand the growing need to serve employed job seekers outside their work hours. What we are proposing is to provide an 800# networked system for clients to access information about services, referral, and scheduling of appointments. It may be possible to provide a telephone system that is not staffed providing 24/7 access. Each program could then provide non-traditional access to their services as needed.*
 - *When the Marathon County Job Center was first opened we operated on an 8am to 5pm schedule and were open until 6pm on Mondays. This was NEVER worth while. We advertised and the average was 3-5 customers/night (always the same ones). We surveyed those customers and they said that they could come before 5 PM. It was just quieter after 5 so that was why they came then. Then for a period of 4 weeks in a row we jointly advertised with the Social Security Administration that we would have Saturday morning hours (8 am - noon). We had a large roadside sign, did newspaper and radio advertisement. I worked three of the Saturdays. We had 2, 3 and zero customers.*
 - *This has been attempted in the past at multiple locations in the district with little usage...*
 - *Would this be 4 hours per week, per month or per year?*
 - *Requirements #2 and #3 have different messages. In requirement 2 it is required that the center be open non-traditional hours, even though there is no proof that these hours will attract customers to the center. In requirement 3 the phrase open as needed is used. Open as needed would provide a center with the flexibility of not having to be staffed just to meet a number of hours, even if customers were not present.*
 - *This was shared with our partners and one other comment that came up was regarding the proposed requirement to have Job Centers open at least 4 hours during non-traditional business hours. Historically when this was tried it did not prove productive in our area except on special occasions (specific groups, personal requests, or open houses). In this day of shrinking financial support for the Job Centers we would ask that this be taken into consideration.*
 - *It is unclear as to whether this is four hours per day, week, month or year. Please clarify. We recommend that the requirement be four hours per week.*
 - *Do non-traditional hours include the lunch hour? If not, what policies will be initiated to ensure that contract employees (Job Service) will be required to work beyond their contract 8:00-4:30 p.m., without incurring overtime or violating contract language?*

- *4 hours of non-traditional a week is too costly, go with 4-6 hours a month. Weekly extended hours may not be necessary.*
- *“The Job Center will be open at least 4 hours during non-traditional business hours.” This requirement reinforces the Job Center as a place that must be open a standard set of hours, rather than a service addressing the needs of clients. Instead of requiring that the Job Center must be open a minimum number of non-traditional hours, it would be better to look at how and if services are available at times when they can be used by working clients – scheduled appointments, on-site visitations, technology systems, etc. This requirement applies to only the comprehensive Job Center. It would be important to provide services in non-traditional ways at affiliate sites also. In addition, staying open during non-traditional hours would be difficult to achieve for agencies with negotiated labor agreements. We suggest changing this requirement to: provide services in non-traditional ways rather than nontraditional hours.*
- *While we fully understand DWD’s desire to have centers open non-traditional hours, this is not a new concept as over the years at least three of our centers have implemented non-traditional hours by being open until 8:00 p.m. one evening per week. Over an extended period of time, during which the hours were marketed, and data on usage was kept, the management teams of the centers determined it was not cost effective for the very small number of customers served. Non-traditional hour offerings become very costly, as centers, for safety and security reasons, need to have two staff working with limited resources, labor contract issues etc. it is very difficult to implement extended hours. Most of our centers are currently open from 8:00 a.m. – 4:30 p.m. (42.5 hrs. per week.) To increase the number of hours of operation would require additional staff resources. Local needs/usage and available resources should determine a center’s schedule.*
- *All Partners in the center should be required to proportionally support the resource room staffing and center infrastructure for universal service. This would greatly assist in providing extended hrs. of operation.*
- *Adding 4 additional hours when we have trouble providing coverage now. We offered evening hours in the past and discovered that only a few people used it then. If we stay open in the evening or on Saturday we will need to shut down at some other time. (Friday afternoon maybe.)*
- *Many of the employees in the Job Centers are working within a union system and this may pose a difficulty in supporting due to established union contracts.*
- *Under the requirements section, item number 2 says the Job Center will be open at least 4 hours during non-traditional business hours. Speaking for the WDA that I work in, over the last 14 years, we have tried a variety of nontraditional hours, including opening earlier, and staying open later. These never yielded new foot traffic other than a very small number of people. In our current environment, where all the one stop partners are taking reductions, the notion of ‘doing less with less’ comes to mind. We are at a point where expanding services is not practical without getting additional resources to do so. Working people who want to access Job Center services can access some of those 24/7 already (for things like JOBNET). Depending on the agencies involved, and specific union contracts, there are also concerns that have to be looked at, including when wage differentials kick in for some agencies.*
- *A question raised was whether being open at least four hours during non-traditional business hours was daily, weekly, etc.*

- *Is there a clarification of what is considered non-traditional business hours? Do they mean earlier in the morning, lunch hour, after 5:00 p.m., etc. Earlier in the day and evening hours have been tried already at the Center, with very little activity. The Center is already open during the lunch hour.*
 - *It was suggested to soften the language in the sentence.*
 - *The requirement for the job center to be open at least 4 hours during non-traditional business hours is vague. SCSEP providers are responsible for serving other counties and are often out meeting with clients. The SCSEP does not have extra staffing or funds to make this possible.*
 - *Please be specific – is this per week? Our locations have dropped evening hours due to a lack of customer demand.*
 - *Question to the State - is the expectation 4 hours per week? day? Etc.*
 - *Extra Center hours: what are considered traditional hours —what services are expected. Is there any flexibility when an individual Center has proven low usage during extended hours?*
 - *When the goal is to accommodate diminishing resources why would you try to increase hours?*
 - *Has there been recognition that labor contracts may need to be renegotiated to accommodate public represented employees.*
 - *We would encourage off hours services include events - not just standing services.*
3. The Job Center will be open extra hours to meet specialized recruitment needs of employers. Job Centers should be demand-driven and open as needed.
- *I believe this could cause all kinds of union issues. Depending on what the demand is. These would be both State and County unions depending on the center.*
 - *Many of the employees in the Job Centers are working within a union system and this may pose a difficulty in supporting due to established union contracts.*
 - *The Job Center does this already*
 - *“Extra hours” needs to be clarified. SCSEP providers may not necessarily be available for additional hours outside of their current schedule(s) since they are often times out meeting with other clients.*
 - *Off hour employer recruitment – could they include the option that the customized activity could be located off – site assisted by Job Center staff?*
 - *Delete the "extra hours" requirement. This will be hard to monitor and may not be applicable in all areas. This should be a local decision.*
4. The Job Center must have a liaison to schools to outreach to youthful job seeker and ensure they have access to the Job Center’s services.
- *This could be required in the WIA youth contracts or expected of counselors. It is a good idea.*
 - *This is possible.*
 - *Currently doing this in Superior and somewhat in Phillips. The WIB HC consortium has plans to work with all the schools in the district.*
 - *“The Job Center must have a liaison to schools to outreach to youthful job seeker.” This is a positive new requirement. Is this person required to be full-time and located at the Job Center?*
 - *This could be accomplished through the WIA Youth contracts if mandated to be in the job centers.*
 - *This is already being done.*

- *Job centers should ensure outreach as well as assistance to older adults who should be recognized as potential job seekers. The State of Wisconsin's WIA Unified plan and the Senior Employment Services Coordination Plan need to identify common goals to coordinate outreach efforts for older adults.*
5. The Job Center must address the needs of youthful job seekers. (Ex. setting up a youth literature rack, designating a youth PC that has more youth oriented applications on it, or having a youth area on the website.)
- *Could also be required in the WIA youth contracts.*
 - *Also possible.*
 - *This is a possibility.*
 - *"The Job Center must address the needs of youthful job seekers." This is also a positive new requirement. Interestingly, one way to achieve this requirement is through a youth area on the website. This supports the concept of the Job Center as a system rather than a place. An enhanced website can extend Job Center services to 24/7, offering non-traditional access.*
 - *A youth website has been in the works for a few years. A high school student was working on it. It has never been completed. It could be finished and implemented by possibly Parkside or Carthage, as a class project.*
 - *Kenosha Unified held their Transition Fair here this year and will be holding it again here next year.*
 - *The job center must meet the needs of older job seekers as required in the publication developed by the Department of Labor, "Protocol for Serving Older Workers." The protocol outlines a set of action steps that key stakeholders need to embrace to achieve the stated goal of connecting employers to older workers and older workers to jobs. A copy of the publication is attached.*
 - *First the Job Center must be a place that youth feel comfortable coming to. You can have all the materials in the world available, however if the customer doesn't come to the center, it's all for naught.*
6. The Job Center must have an integrated, coordinated Business Services Team.
- *We are doing this now.*
 - *We are doing this now.*
 - *Already in place. Discussion centers on business needs (pre-screening, labor law clinics, TPS usage, job fairs, employer breakfasts, etc.) and contacts.*
 - *Western Wisconsin has taken a regional approach to business services to ensure that trained staffs were communicating directly with employers, and that resources were allocated effectively to serve the full region. We would recommend that maximum flexibility be allowed to develop Business Services Teams that are locally effective and not constrained by geographical boundaries.*
 - *This is already being done. Maybe have, "coordinated Business Services Team," further defined.*
 - *Business Services Teams – Support current WDBSCW effort*
7. The Job Center must have a Business Services Plan that includes:
- *How the business relations team will accomplish area-wide business service development consistent with the Workforce Investment Act Local Plan.*
 - *I think there should be some statement that indicates that the Job Center must have a business services plan that is consistent with both the local WIA local plan, and individual plans of the various agencies within the Job Center.*

- How job order quality will be improved including increasing the number of orders identifying high wage jobs.
How the Job Center will increase the number of job orders entered directly by the hiring business.
- *I believe our area has one of the highest levels already – is there an upper target? Are we already exceeding the expectation or is 100% the goal?*
- A system to measure business support for the Job Center & its services
- *This is done WDA wide not by each job center. It is required in the Job Service plans.*
- *Can be done.*
- *The JS Biz Plan is leading the way. Staff are working with the WIB HC consortium to increase the awareness of available occupations, and increasing health care business usage of the job center system.*
- *The definition of “business support” is needed in order to measure it.*
- *If staff capacity allows it JC’s should be able to input job orders for employers. That process allows for the development of a relationship with employers. Direct entry can be offered but not necessarily encouraged, let it up to the local area how much it needs to be encouraged.*
- *Fourth bullet-What do they mean by a system to measure business support for the Job Center and its services.*
- *Should this be by WDA or by Job Center?*
- *The Job Center has this. Attempts will be made to make bulleted items two and three under number seven.*
- *Reference should also be made again to collaboration with partners that are providing support to businesses such as the WTCS to avoid duplication of efforts and maximize resources.*
This language does not acknowledge that some areas have well developed Business Planning process and content beyond the Job Service Business Plan concept. The Workforce Development Board of South Central Wisconsin has been conducting Job Center based business planning for 5 years and has evolved the focus and content beyond the language offered in this document. Effective planning needs to also take into account local needs and be reflective of what are realistic improvements to the current system.

8. The Job Center must have a plan that ensures a trained, competent staff and participates in a staff credentialing program (ex. NAWDP).

- *W2 partner staff have extensive training. So do Job Service staff. Who will mandate the credentialing of Job Corp and Carl Perkins staff? What about staff that are hired with Master’s Degrees?*
- *We question the need for this and how will it be paid for? But, would support any staff that wished to be credentialed.*
- *The WIB-OSO is addressing this issue.*
- *Credentialing may put people into new classifications/pay ranges. The LCPT would suggest leaving it up to each job center management group to decide on one person per job center to be credentialed. There was a concern about the initial cost of the NAWDP training and the ongoing costs. There was also a concern about the ongoing training of 20 hours per year. That is excessive when compared to FEPS or Licensed Counselors.*
- *I think you need to outline exactly what staff need credentialing here. W-2 already has extensive training and credentialing requirement and not enough time in the day*

- *to meet the existing requirements.*
 - *Staff is being encouraged to obtain NAWDP certification*
 - *Does this requirement apply specifically to Job Center staff or are partners included as well? More information is needed on the credentialing program for SCSEP providers.*
 - *Does this include all Partner staff and managers? The State of Wisconsin will not allow State staff under union contract to pay an individual Association membership fee to work. How will represented staff membership be handled?*
9. The Job Center is participating in a continuous improvement program. (Baldrige Express, ISO 9000, Six Sigma, etc.).
- *I believe we need to strive to provide the best possible service and in that vain need to monitor our quality. I don't believe we need to spend time on a system just because it seems to be popular. A private employer Board member was very, very opposed to this.*
 - *The question may be, is there a need for this, and if so, who would pay for it?*
 - *A definition of "continuous improvement program" needed. The LCPT Members were concerned about the time and effort costs on staff of continuous improvement programs*
 - *"The Job Center is participating in a continuous improvement program." This is a good concept. The big question involves plan implementation and who pays the cost of these programs?*
 - *Hopefully the continuous improvement program would not bog us down with recording keeping. If it does it would not be successful.*
 - *I think that this is a wonderful idea, however agencies are already stretched beyond capabilities and this kind of continuous improvement programming makes a huge demand on time. Will additional funding be provided to help carry this out?*
 - *Kenosha strongly objects to this item.*
 - *Such initiatives are very valuable and appropriate. However, the cost of these initiatives can be substantial. They require extensive training and expertise – to what extent will the system support these efforts?*
 - *This supports the WDBSCW continuous improvement efforts*
10. The Job Center has appropriate signage to ensure ease of use of the Center by all of its customers. (ex. Outside: a Wisconsin Job Center sign, Inside: room locations, required posters such as Complaint Coordinator identification.)
- *We are in fairly good shape on this one.*
 - *Already in place.*
 - *It is unclear whether or not a non-comprehensive Job Center would be allowed to use the Job Center logo to promote service, and if so, how will that impact public perception regarding services and standards available at a non-comprehensive site? We recommend maximum flexibility in this regard.*
 - *There is good signage both inside and outside of the Job Center. The only additional signage that is being researched is some in Spanish.*
 - *Who will pay?*

11. Co-location requirements: (Several options are under consideration. Please inform us if you prefer A, B, or if you have other suggestions.)

General Co-Location Comments:

- *WWWDA #9 strongly objects to the mandatory co-location requirement of Job Service (Wagner-Peyser) staff to define a comprehensive job center. The Wagner-Peyser funding stream is extremely limited, and will continue to decrease in capacity. Therefore, the number of staff that DWD can commit to any Job Center is limited under Wagner-Peyser, and is also dependent upon outside factors including potential retirements and home base commitments of staff. Additionally, government hiring freezes also impact the ability to fill or refill open positions. Without this funding stream commitment, a Job Center is unable to meet the one requirement to be a comprehensive center, regardless of its ability to meet every other requirement. We recommend that if a Job Center can demonstrate that the function of Labor Exchange is being achieved even through other means, such as electronic with Job Service and that the specific agency staff doing the function at a Job Center should not be a requirement. It is service to the customer that should be the determinant of a comprehensive Job Center and not who is doing it.*
- *11 & 12 Co-location - The notion of having at least one comprehensive job center in each WDA is supported by the language in the Act. I believe it is an expansion of the One Stop objective wherein a customer can know that they can go to a certain place and get access to everything that is offered without having to search all over for it. In rural areas it will be especially important to develop the Access Points and system of interconnected services. Mandatory co-location is not something that local partners can require, enforce, or even at times accommodate. This whole section can only be administered by the funding agencies as a part of the contracts. The WDB can require that all WIA funded contract staff be located in certain places. The W2 contract is funded at the Central Office and can require that funded staff or certain activities be located in certain places. But partner staff can't mandate co-location.*
- *Another barrier to co-location is the management of state held leases. State leases are difficult to change to allow for more or less renters in the space or to adjust the space. Yet the cost allocation for the rent as administered by the DOA is capable of changing the rent based on changes in the number of renters, thus making the cost of renting in the Center unpredictable. When one agency loses a staff person it spreads the cost of the unused space to the other renters, or the state agencies have to cover the cost. This system needs to be improved.*
- *Requirement #11 is listing agencies mandated to be co-located in the Job Centers. However, the WDBs, who are responsible for certification, do not have the authority to mandate partners to be in the job center. Without having such authority, this requirement is beyond the scope of authority of the WDBs.*
- *I think what you are doing regarding job center standards (sic) is great! However, there were some allusions from C & I as to difficulties working with WDB's, and we are in such a situation. Here's an example: We are a private, for-profit agency. The lease at the West Bend Job Center clearly doesn't allow for for-profit entities. Therefore, the W-2 agency in Washington County can't be in that Job Center. In addition, the rent is \$1600 per office, but the operating agreement is \$46,000/yr/partner. The services budget for W-2 contracts can't support that kind of situation. How can we be a mandated, integrated partner when we can't get into the Job Center, and can't afford it if we could?*
- *While I realize that federal regulations create the need to define a Comprehensive Job Center, I would encourage you to reconsider whether a co-location standard as*

proposed in the current draft serves the larger purpose of allocating public workforce development resources wisely to meet actual customer needs and preferences. We wholeheartedly support the regional coordination that Workforce Development Boards help to provide, and we would be interested in assisting with developing strong collaborative planning processes at the Job Center level.

- Job Center partners cannot mandate any of these partners to “pay and play.” This must come from the funding sources to mandate. There are also many job centers that are already maxed out on space. What are the sites who have no room for any additional partners to do? How do you mandate a technical college to move into the Job Center? Also, what incentive is there for Native American Programs to co-locate at the Job Centers?*
- Requiring Wagner Peyser/Job Service on-site is a problem when the local areas have limited input on where these staff are based. This requirement would be more acceptable if the local board or management team had final say on where the staff are located and if vacancies are filled more quickly.*
- The proposed co-location and program participation requirements are not conducive to local autonomy or establishing a partner based system of comprehensive services. We are reminded that the state does not close Job Centers, the WDB’s do. However, the prescribed co-location requirements for a comprehensive center will likely result in the state restricting resources to those that qualify and remove the local autonomy that is espoused.*
- While co-location of agencies is desirable, the requirements as presented are unachievable particularly a rural areas. The co-location requirements dictate a building large enough to accommodate at least seven (7) to nine (9) agencies – WIA adult, youth and dislocated worker program operators; Wagner-Peyser service provider; adult basic education and family literacy agencies and 2 to 4 other mandatory partners. This will be virtually impossible and an unreasonable expectation. In the Southwest area not even Janesville – an urban area with a large, spacious Job Center - meets this requirement. For example, SWWDB’s younger youth program operator (CESA 2) works out of their own facilities in Milton and is currently not located at the Rock County Job Center. In order to meet this co-location requirement, CESA 2 would have to co-locate to the Job Center and share in the operational cost of the Job Center. This would be a new expense to CESA 2, since they already own other adequate space, and it could be a deciding factor on whether they continue to be a program operator. This new requirement will be burdensome and interfere with service delivery and should be eliminated in favor of current co-location requirements.*
- If the future funding of Job Centers is tied to being a comprehensive center, the rural Job Centers will not be able to compete due to lack of quantity of partnering agencies.*
- The co-location also dictates a “Place” – physical structure – rather than a comprehensive system of service delivery. We believe that a systems approach would be more appropriate. Rather than forcing co-location, we should be discussing collaboration and how agencies work cooperatively to address client needs. What is the working relationship between agencies? Putting agencies in the same building does not guarantee working cooperatively. Service delivery agreements or Memorandums of Understanding (MOUs) are more important than co-location.*
- Requiring Job Service (Wagner-Peyser) and technical college (Adult Basic Education and Family Literacy) makes these two entities “more mandatory” than any of the other WIA Mandatory One-Stop Service Delivery Partners. This requirement elevates these two agencies to a status higher than required by law. While Job Service see workforce*

development as a primary mission and has been actively involved in the service delivery system, many technical colleges do not see themselves as part of the workforce development system. Furthermore, technical colleges own facilities in many of the same communities where Job Centers are located, requiring them to co-locate could be problematic.

- Co-location requirements. Job center staff should be made aware of other SCSEP service providers in their county other than the agency co-located. The SCSEP will develop criteria for selection of service providers when both are interested in being co-located at the same job center through a signed MOU with the Workforce Development Board. A copy of this MOU will be provided to each job center.
- Partner programs and the Job Center should negotiate separate requirements since there are varying differences in the way a program operates. The negotiated requirements should be stipulated and agreed upon in an MOU.
- In the both recommendations there is no assessment of what is currently working effectively and financially viable or if all DWD agencies located in a comprehensive Job Center are paying an equitable share.
- Also if DWD allow for the WDBs to designate centers as comprehensive should then DWD staff Centers based on their comprehensive status -- not have DWD staffing drive comprehensive status.

Co-Location Comments Specific to Technical Colleges:

- The huge problem here is the Technical College. They are in Rhinelander fulltime. They are only in Wausau ½ time...with NO desire to increase their presence. As far as meeting the other requirement we are in good shape.
- Including the tech colleges could be an issue. Currently they are 'truly' co-located with the job center in Phillips, and somewhat in Medford and Hayward. Getting W2 into the centers needs to be enforced by 'the state'. Currently they are only co-located in Burnett County, Price County, Washburn County and will be in Superior or Douglas County come January 2006.
- Western Wisconsin Technical College is opposed to Job Center standards that would require the physical presence of Adult Basic Education and Family Literacy (AEFL) staff and services in order for a Job Center to be classified as "comprehensive." This requirement would create inefficiency, logistical issues, and additional expenses for the WWTC based on the following:
 - Inefficiency would result from the College providing the same adult basic education services in two locations. The La Crosse Job Center is located on the WWTC campus, and our adult basic education services are less than one block away. Offering AEFL services at the Job Center would be expensive, because it would mean adding a new position at the Job Center. (Our current staff is currently busy full-time on their current AEFL duties.) It is not clear how this position would be funded? Technical colleges are under scrutiny and we need to keep costs down. Having two AEFL offices less than a block apart is a duplication of effort.
 - It is not clear what types of AEFL services would make a Job Center comprehensive. Would the standard require adult basic education instruction, assessment, counseling, and GED testing? There would be many space and logistical issues surrounding co-location of these services at the Job Center. WWTC offers many different basic education levels of training for many subject areas. It would be difficult to ascertain

which of these levels and subjects would be most in demand at the Job Center. The customer could well be confused on where they would need to go for what. If all of the basic education services are located in one place instead of split between two, it simplifies matters. It makes sense for WWTC to continue to operate a one-stop basic education program.

- Job Centers are located on four of WWTC's six rural campuses, where WWTC also provides adult basic education. It does not appear that there is an issue with these services. The Sparta adult basic education program at WWTC is located downtown so it is convenient for students to attend. It is not located in the Job Center or the WWTC Sparta campus. The Job Center is located two miles from downtown in a rural location.*
- I have some concerns with the Certification Requirements for Comprehensive Job Centers. Many of the elements of this draft do portray a picture of an ideal, full-service Job Center. However, the requirement for technical college Adult Basic Education (ABE) services to be physically housed at comprehensive Job Centers is too arbitrary and stringent a standard. Technical colleges now offer ABE instruction at many dozens of campus and outreach sites, including some Job Centers. I am sure that technical colleges and the Job Centers will enter into appropriate arrangements to make ABE services available to Job Center customers, including providing on-site services, where local demographics and service delivery needs justify it. However, a uniform standard to be applied statewide requiring on-site ABE services for 75 percent or 100 percent of a Job Center's hours of business does not appear to be a response to an analysis of demand but simply a statement of an ideal without regard to resource constraints or local conditions.*
- The certification requirements document does not specify who would pay for ABE services at a Job Center. Ostensibly, that matter would be worked out through the cost-sharing plan that each Job Center would be required to have. However, with scrutiny of local and state government expenditures increasing, all Job Center partners must be more judicious than ever in their programming decisions. ABE is not a core Job Center service, and arbitrarily requiring an on-site ABE presence may not be consistent with the need to carefully coordinate public services and seek efficiencies in the use of public dollars. This proposed standard is not consistent with principles, stated elsewhere in the draft, of assuring a minimum array of services while leaving the specifics of how to deliver services up to local partners and coordinating services across programs to avoid duplication.*
- That would require on-going collocation of Adult Basic Education and Family Literacy programs. Our college is currently providing these services on a part-time basis at the Wausau Job Center and in our North Central Region at Job Centers collocated at the Phillip, Medford and the Antigo Campuses. These collaborative efforts have worked to support services for Job Center customers. However, given the increasing budget restrictions and the on-going need to offer services at the main campus and our regional campuses, it may not be possible to continue to offer these services at the Job Centers indefinitely unless the budget picture changes.*
- I have a particular concern regarding the inclusion of the Adult Basic Education and Family Literacy (AEFL) program co-location requirements (and the specification of on-site hours of service). I question the rationale for selecting this particular program out of the listing of mandatory partners. MSTC is actively partnering with the WBD, WIA, Wagner-Peyser, and literacy councils (among many community and employer*

relationships). Adult basic education is available in each community that also has a Job Center within our district. We are exceeding the number of students that are targeted to be served through these program funds. To establish another location in the community would increase administrative costs (rent etc.) and further restrict the resources available for direct services to students. We have in the past maintained an on-site presence of Adult Basic Education services in the Job Center but decided to discontinue those services due to low enrollments and associated costs. We currently partner in a system approach (rather than physical location approach) and find it more fiscally effective. We have also discussed options of co-location of partner agencies on our campuses and in most cases are unable to do so, not because of lack of commitment or interest, but due to space availability.

- *Does the phrase “Adult Basic Education and Family Literacy (Technical College)” make co-location of technical colleges in the Job Center compulsory? Or, could another community-based organization or faith-based agency provide these services? Clarification of this point is needed.*
- *Question – Has anyone at the State level had a conversation with the Technical Colleges? Are they willing to financially support services based at Job Centers? Are the technical Colleges aware that they must pay for participation and not rely on the partners funding?*
- *If Adult Basic Education and Literacy WIA Title 2 required why aren't all the WIA Title 1 services included?*

A. Co-location requirements — WIA Title 1, Wagner-Peyser (Job Service), Adult Basic Education and Family Literacy (Tech College) and **at least four other** mandatory partner programs (listed below) have staff physically housed at and delivering services from the site.

WIA Mandatory One-Stop Service Delivery Partners:

- WIA activities for Adults, Youth & Dislocated Workers (WIA Title I)
- Adult Education and Family Literacy (WIA Title II)
- Job Service - Labor Exchange such as Job Net (Wagner-Peyser WIA Title III)
- Vocational Rehabilitation (WIA Title IV)
- Welfare-to-Work
- Temporary Assistance to Needy Families/WI W-2 (Added by the Governor)
- Food Stamp E & T and Food Stamp Workfare
- Senior Community Service Employment Program- Older Americans Act
- Carl D. Perkins Vocational and Applied Technology Education
- Trade Adjustment Assistance (and NAFTA-TAA)
- Veterans E & T Services & local veteran's outreach programs
- Community Services Block Grants
- Housing and Urban Development E & T Activities
- Unemployment Insurance
- W-2 Employment and Training Services

Representatives from national programs are **mandatory if present in area:**

- Native American Programs
- Migrant and Seasonal Farm Worker Programs
- Job Corps
- Youth Opportunity Grants
- Veterans

- *This is unlikely. We can try, but we can't mandate.*
- *This requirement is absolutely ridiculous. We have no way of requiring these partners be in the Job Centers. In fact these partners were invited to participate in a meeting to explain the benefits of being in the Job Center and several did not even bother to show up.*
- *How would the Department enforce mandatory on-site presence of Native American Programs when their funding is direct from the federal government?*
- *It is unclear what the term "in the area" means. We would recommend this be clarified, and allow for maximum flexibility*
-

Comments Preferring Option A

- *Some centers are on Technical College campuses, the ABE is offered in another building that should still be co-location. I would recommend Choice A, but have comments: Is the item TANF/WI W-2 that same as W-2 Employment and Training Services? Unemployment Insurance is mentioned, we have information and phones to use, but they are not ever on site, are they?*
- *All mandatory partners should be contributing and integrated into the one-stop system. Option A is the preferred choice but also creates incentive/penalty for mandatory partners integrating and co-locating or not co-locating. According to our discussions, it is inappropriate to this the Native American Programs to be on-site as they can only serve WIA eligible participants that live on the reservation.*

- B.** Co-location requirements — WIA Title 1, Wagner-Peyser (Job Service), Adult Basic Education and Family Literacy (Technical College) and **at least two other** agencies that provide the mandatory partner programs listed below have staff physically housed at and delivering services from the site.

WIA Mandatory One-Stop Service Delivery Partners:

- WIA activities for Adults, Youth & Dislocated Workers (WIA Title I)
- Adult Education and Family Literacy (WIA Title II)
- Job Service - Labor Exchange such as Job Net (Wagner-Peyser WIA Title III)
- Vocational Rehabilitation (WIA Title IV)
- Welfare-to-Work
- Temporary Assistance to Needy Families/WI W-2 (Added by the Governor)
- Food Stamp E & T and Food Stamp Workfare
- Senior Community Service Employment Program- Older Americans Act
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- Trade Adjustment Assistance (and NAFTA-TAA)
- Veterans E & T Services & local veteran's outreach programs
- Community Services Block Grants
- Housing and Urban Development E & T Activities
- Unemployment Insurance
- W-2 Employment and Training Services

Representatives from national programs are **mandatory if present in area:**

- Native American Programs
- Migrant and Seasonal Farm Worker Programs
- Job Corps
- Youth Opportunity Grants
- Veterans

- *This is unlikely. We can try, but we can't mandate.*

Comments Preferring Option B

- *This seems more doable than option A.*
- *I would recommend going with option B and modifying it to include TANF/W2 as a mandatory partner*
- *Prefer Option B with several reservations*
- *If I had to choose between A or B, I'd go with B. In rural areas, it isn't as easy to have all the listed partners at all the sites.*
- *Category B is my preference, however, once again...Job Center partners cannot mandate any of these partners to "pay and play." This must come from the funding sources to mandate. There are also many job centers that are already maxed out on space. What are the sites who have no room for any additional partners to do? How do you mandate a technical college to move into the Job Center? Also, what incentive is there for Native American Program to co-locate at the Job Centers?*
-
- *Other Options Recommended*
 - *An alternative to the urban, bricks and mortar Job Center model is in order for rural areas--a model best described as a comprehensive job center system comprising multiple service locations or service center clusters, none of which in and of themselves would qualify as a full fledged comprehensive job center. Such clusters--which in combination would meet most or all of the requirements of a comprehensive center (except of course, co-location in a single center) -- should be an option for meeting the definition of "comprehensive" for rural areas.*
 - *The consensus was that co-location for purposes of Comprehensive Job Centers should require 3 partners and the Job Net present. The word "housed" is problematic for the area and the consensus was that the outreach or itinerant partner presence should be acceptable when they are assigned there, pay for space there or are in the same building.*
 - *For Kenosha neither one is an issue*
 - *We offer Option C: minimally all WIA Title 1 agencies should be included and then offer at least 4 other programs – this should be true of all comprehensive center system.*
 - *Start mandating delivering services from the site you are eliminating the economy of scale that can accomplish by technologies such as distance learning that may be broadcast from Technical College to Job Centers, etc. or from other remote sites.*

12. To be considered co-located, an agency or program must be on site at least 75% of the hours the Job Center is open to the public.

- *Many of the staff are likely to be out-stationed to satellite or access points part of the time. This could be hard to meet.*
- *I would strongly support DWD using whatever power we have to move the required partners into the Job Centers for at least 75% of the time. However I do not feel it is appropriate to penalize a Job Center if a partner refuses to participate. With the exception of the Technical College only being in Wausau 50% of the time the center is open to the public. All other partners in Wausau or Rhinelander are present 100% of the time.*
- *See above (#11). This seems to be an urban model, and not realistic to a rural*

area...

- *While many programs would have their primary office co-located in the Job Center, their work may require them to be out of the office delivering services and they may not be on-site 75% of the time; or all hours that the Job Center is Open. Some examples include: Senior Community Service Employment Program - Older Americans Act, Job Corps, Migrant and Seasonal Farm Worker Programs. We recommend greater flexibility with this standard or a clarification of the wording/intent.*
- *Our Job Center in Berlin is open 40 hours per week. However, it is unrealistic to expect that all partners be onsite 75% of the time the facility is open. It isn't warranted, nor is it cost effective. Again, I would not put a percentage of time on how often partners should be onsite, only to say that partners will be on site as needed.*
- *A general overriding thought is that Job Centers are considered to be a place – a building where partnering organizations co-locate – rather than a system of service delivery. This is a major impediment to Job Center operations, particularly in rural areas, where requiring physical facilities to co-locate multiple agencies is limited. We strongly recommend that mandatory co-location requirements be reconsidered.*
- *“Percent of time an agency must be on-site.” Of the two options the 75% Option is preferred. However, for many of the reasons stated above, we disagree with any type of time requirement and suggest using current standards. For example, technical colleges faced with their own mission, priorities, and funding limitations, may be unwilling or unable to afford co-location at a Job Center particularly if the college already owns or leases other space in the same city. Before this requirement is finalized, DWD should negotiate a memorandum of understanding with the technical college system defining co-location responsibilities.*
- *Having the Wisconsin Technical College ABEFL programs co-located on essentially a full time basis (75% of the hours a center is open would be 32 hours per week, as centers are open 42.5 hours per week) while desirable, is not realistic in this WDA. The local WTC's do maintain hours of service in most of our centers, but nowhere near those being required. We do not support WTC being a mandatory partner with the onsite hours required in #12 below. Locally we have very little control regarding WTC's need/ability to increase their presence in the centers. This needs to be addressed at the State Workforce Investment Council level.*
- *Many of our programs require staff to be out of the office more than 25% of the time. This may be impossible to meet.*
- *This is being met by Kenosha.*
- *SCSEP providers are responsible for serving other counties. It is impossible at times to be on site for at least 75 percent or more when the job center is open. SCSEP does not have funding to support additional staff. Partner programs should be waived from this requirement.*
- *The other item is requiring the technical school to be a mandatory partner and be present at least 75% of the time. At our level we have no control over what the technical school does. I think these needs to be addressed at a higher level. The Fox Cities Job Center has over 40,000 visits a year but would not be considered a job center because the tech school is not a major partner.*
- *Get away from on-site language. I believe we need to think of access to services.*

Or, To be considered co-located, an agency or program must be on site all hours the Job Center is open to the public.

- *This is the same Technical College problem. (See #11) Local partners cannot mandate*

co-location of other partners.

- We do not support the mandatory amount of time a partner needs to be present to be considered co-located. We need to recognize that listed services/agencies will be present during specified hours, not 75% or all hours the center is open, do to variation in community need.*
- Many of our programs require staff to be out of the office more than 25% of the time. This may be impossible to meet.*
- This is being met by Kenosha.*
- SCSEP providers are responsible for serving other counties. It is impossible at times to be on site for at least 75 percent or more when the job center is open. SCSEP does not have funding to support additional staff. Partner programs should be waived from this requirement.*
- 75% or 100% could be a problem where staff are shared across a region. We'll need more ability to assign staff appropriately. Also there are times when one site effectively serves a region on one aspect or another.*
- It is also not currently possible to offer service at least 75% of the time that the Job Center is open. There is not budget or adequate space for this to happen. We have already cut the hours the Learning Center is open at NTC on the main campus due to tightening budgets. More over, with budget restrictions at all levels of education and government, it is not likely that we will have funding to pay for the cost sharing plan.*
- Has the Department of Workforce Development determined if the Technical College is positioned to fund onsite Job Center based 'Basic Skills Education at 75% time?'*
- To what degree is Department of Workforce Development positioned to provide Wegner Peyser funded staff co-located 75% to full time in Job Centers. How many Job Centers can be accommodated? Will local areas be given an allocation of Wegner positions?*
- When you start mandating delivering services from the site you are eliminating the economy of scale that can accomplish by technologies such as distance learning that may be broadcast from Technical College, etc or from other remote sites*
- 75% must acknowledge innovative technologies this could expand services access remotely even to non-comprehensive center*

13. All partner programs use DWD IT systems that include, at a minimum, ASSET, JobNet, and JobNet Business. WIA funds may not be used to duplicate these systems available from DWD.

- Will ASSET be provided as well as training?*
- They could add WorkNet to this. I suppose this would be a problem for the Tech colleges who have their own systems. And if they don't have to obey then why will anyone else?*
- No problem. I assume DVR's system is ok.*
- DWD partners will be on board with this. Non-DWD partners may be another issue...*
- Again how will/can enforcement take place for non-DWD partners?*
- All partners programs use DWD IT systems that include, at a minimum, ASSET, JobNet, and JobNet Business. WIA funds may not be used to duplicate these systems available from DWS. Hmm. If the product is good, we should use it, but if it stinks we will still have to use it.*
- All partner*
- It is our understanding that several of the required partners do not utilize the DWD IT system mentioned, including the WTC, the Division of Vocational Rehabilitation and the Older Worker programs. Will these partners be required to use ASSET?*
- This is being met by Kenosha*

- *The SCSEP program utilizes a separate web-based reporting system as required by the Department of Labor. SCSEP providers who are currently co-located should be offered the opportunity to access ASSET which is helpful for co-enrollments.*
- *This could conflict with the quality and process improvement standard #9. The Baldrige Express could result in a finding that a Center needs a stronger or more comprehensive information system than what is currently available from DWD.*
- *Is the Technical College who is cited as a mandatory onsite partners positioned to use DWD IT System? Do they currently use a different system? How will this be accommodated?*
- *Use of DWD technology is there a commitment to keep the technology current, and responsive to local management needs and available at competitive and reasonable cost.*

14. The Job Center has a system in place to evaluate its effectiveness and makes that information available to the public.

- *Effectiveness at what? I think it means the new uniform measurements, but what if it includes all the process requirements of W2 and every other kind of grant? This is doable and some of us do it now.*
- *Doable*
- *WDA 7 has been surveying customers (both employer and job seeker) for more than 3 years.*
- *It was suggested to post customer survey information on the website for public availability.*
- *Similar to a comment I made above, it would seem that there would be some statewide template of an evaluation tool used by comprehensive Job Centers. Local areas could add to that template as they choose, but there would at least be statewide consistency on some of the evaluation criteria/methodology.*
- *The Job Center creates a report that is valuable to the public.*
- *Summaries and trends would be appropriate; however every specific comment (praise or criticism) would be inappropriate.*

15. The Job Center maintains an up-to-date website that includes services, events, contact information, hours of service and links to JobNet, JobNet Business, and WorkNet.

- *This is a shared cost issue that can be solved. It is not cost nor time effective to have a website for a single job center. Perhaps one for the WDA. These things have to be maintained.*
- *This is a shared cost issue that can be solved. DVR WILL NOT pay for some of these costs. I feel it is incumbent on DWD upper management to ensure that DWD controlled entities are paying their fare share of the cost. I also understand that there may be some legitimate legislative reasons that some cost can not be shared.*
- *Cost may be an issue, but probable...*
- *Whereas a web site for each job center is cost prohibitive, perhaps tying into the WIB sites would work.*
- *DWD's website must also contain links to all local one-stop websites. It should work both ways.*
- *This is not cost effective.*
- *This is being done.*
- *Is DWD going to dedicate dollars to local comprehensive Cents level to maintain websites? Currently there is no DOWD funds allocated to the design of local websites. Also DWD needs to support more responsive software to support maintenance and*

design websites on state computers.

16. The Job Center services to jobseekers (workshops, resource room, training availability, etc) and business customers (focused business customer recruitment, pre-screening, job order processing, etc) must be focused on:

- High wage employers
- *Please define*
- Health care industry
- Advanced manufacturing and/or construction industry
- Sustainable wage plus employers
- *Please define "sustainable wage plus" employers*

- *Well, this is good for this year, but some time in the next 5 years we might want to help our other quality employers.*
- *This is in process currently. The Job Service Operations Plan strongly addresses this issue.*
- *The partners are following job service's biz plan lead with this.*
- *What do you mean by focused on? What is high wage, what is a sustainable wage?*
- *This is good, but the W-2 customers and many others who utilize the job centers are looking for entry level jobs, not the "premium jobs" so how is this helping our population? Has there been a usage survey to determine the greatest demand for jobs by all job centers?*
- *There would need to be a clear definition brought forth of the concept of Sustainable wage plus employers. It's something Job Service is working on, but not known to all the partners in any sort of detailed way yet.*
- *The Team felt that the focus should be on the marketplace that the Job Centers exist in. A suggestion was to soften the language to say that it will be looked at locally.*
- *Project staff suggest using the phrase "based on labor market." They also think that this requirement, as it is currently written, stresses that the Job Center be designed to help only the BIG WEALTHY employer. What about the smaller, mom and pop type of employer in the community?*
- *Please do not subject our WDA to the Job Service choices. We have worked hard at choosing our focus for our area. You could indicate high wage or healthcare. I believe this is statewide. Leave the rest to the WDA.*

17. The Job Center must provide the following services: (Several options are under consideration. Please inform us if you prefer A, B, or if you have other suggestions.)

- *Retain the current service requirements. Also, the two lists of services do not identify adult basic education and family literacy, therefore, why the additional requirement that adult basic education and family literacy agencies be a compulsory partner required to be co-located in the Job Center?*
- *I think it is important to keep in mind that small Job Centers have most, if not all, the services in the Certification Requirements for Comprehensive Job Centers. Policy should be developed that allow for exceptions under certain justification/circumstances for these centers to continue to serve residents in the most cost effective and efficient manner possible.*

A. • The Center ensures veterans preference across all services and programs.

- *Doable*

- The Center provides regularly scheduled financial literacy assistance, information about & referral to credit counseling.
- Any job orders solicited by or delivered to ANY Job Center staff be listed on JobNet
- *This will take some negotiation on the part of the Job Centers, some information that comes to the Technical College system is not shared. This is a possible issue for DWD Secretary level.*
- *What if the employer declines our offer to post the listing on JobNet?*
- List job orders and make connections between job seekers and employers
- Offer pre-screening for targeted employers based on a posted job order
- *Delete "on a posted job order." We should offer pre-screening, but this should not be tied to the job order system, rather our individual business service strategies.*
- Provide information about available job training and make referrals as needed.
- Provide customer access to all other required WIA partner programs.
- The site meets ADA physical and program accessibility requirements
- The Resource Room/customer service areas of the center are staffed all hours the center is open. A Job Center staff is dedicated to the Resource Room. That is, persons who are properly trained in this function and whose primary duty is to provide Resource Room services staff the room.
- *Suggest utilizing SCSEP participants to be recognized as "staff or trainees" to assist with the Job Center Resource Room*
- •Provide assessment and testing for both occupational and soft skills.
- *define/describe occupational skill)*
- Already in place
- Provide equal access to all services and programs (including resource room materials and services) for all customers, including persons with disabilities and limited English-speaking persons.
- *This makes sense.*

Comments preferring Option A

- *I choose option A but have questions: 1st bullet-veteran's preference across all programs, does this include DVR?*
- *I would prefer option A*
- *A was preferred.*

- B.** Eligibility determination: Process to determine whether an individual is eligible to receive assistance;
- Outreach, intake: Outreach, intake (which may include worker profiling), and orientation to the information and other services available through the one-stop delivery system;
 - Assessment: Initial assessment of skill levels, aptitudes, abilities, and supportive service needs;
 - Job Search: Job search and placement assistance, and where appropriate, career counseling;
 - Labor Market Information: Provision of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including - job vacancy listings in such labor market areas; information on job skills necessary to obtain the jobs, and information relating to local occupations in demand and the earnings and skill requirements for such occupations;

- Provider Performance: Provision of performance information and program cost information on eligible providers of training services, youth activities, adult education, postsecondary vocational education activities and vocational education activities available to school dropouts, and providers of vocational rehabilitation program activities;
- Local Area Performance: Provision of information regarding how the local area is performing on the local performance measures and any additional performance information with respect to the one-stop delivery system in the local area;
- Support Services: Provision of accurate information relating to the availability of supportive services, including child care and transportation, available in the local area, and referral to such services, as appropriate;
- UI Claims: Provision of information regarding filing claims for unemployment compensation;
- Other Eligibility: Assistance in establishing eligibility for welfare-to-work activities authorized under section 403(a)(5) of the Social Security Act (as added by section 5001 of the Balanced Budget Act of 1997) available in the local area; and programs of financial aid assistance for training and education programs that are not funded under the WIA and are available in the local area;
- Follow Up: Follow-up services, including counseling regarding the workplace, for participants in workforce investment activities authorized by WIA who are placed in unsubsidized employment, for not *less than 12 months after the first day of employment*.
 - *Most of these are currently being done.*

Comments preferring Option B

- *OKAY! This is what should be in this document. I like B better. The A gets into the wish list mode. We could do these things but it seems sort of scattered thinking.*
- *We would recommend option B*
- *We would prefer option B, universal services provided by centers.*
- *We prefer B*

Other Options Recommended

- *Offer Option C - which includes Using Items under B plus Literacy programming and restating and reduce items under option A to quality indicator language and then applying the quality indicators to job development, job placement and retention — plus business services activities?*
- *Neither Plan A or B works with your stated parameters. It would be better to allow Job Centers and Adult Basic Education and Family Literacy programs to develop the strategy that works best in their area to serve customers rather than to set up these tight parameters that will not be able to be met.*

18. The Job Center must have a cost sharing plan that identifies how each partner will participate in the support of the Center (e.g., Job Center staffing, shared facilities costs).
- *Will anyone review the plans?*
 - *We are in the process of doing this.*
 - *Already in place.*
 - *The idea of requiring partner agencies to essentially pay for infrastructure costs to maintain Job Centers is not beneficial to working relationships nor does it reflect a*

commitment of the state workforce system to deliver the services they are responsible for in cooperation with other providers.

- All Partners in the center should be required to proportionally support the resource room staffing and center infrastructure, including DVR.*
- Cost sharing plan*
- The Kenosha County Job Center is not a legal entity. Things are not put out by the Job Center.*
- Cost sharing agreements – minimally the cost sharing agreements must have equitable ration of costs based on ration of personnel or space from the WIA Title 1,2,3,4,5 programs.*
- I would state each mandatory partner must participate in the cost sharing plan for the operation of the workforce system and the one-stop system. We have moved to one OSO for the whole...not MOU's for each Job Center. We really need to think of the system, not sites.*

19. The Job Center must have a facilities operating budget.

- Isn't this all included in the rent agreement?*
- This is harder to do as there is not direct job center manger. Can be done.*
- Already in place through lease.*
- This may work when there is one central lease, but our job center operates on separate leases*
- Facilities operating budget*
- The Kenosha County Job Center is not a legal entity. Kenosha has a facilities operating budget, but it is Kenosha County Human Services.*

20. The Job Center must have a strategy to obtain supplemental funding beyond dollars from DWD, or partners. (Fee-for-Service, foundation grants, etc.)

- We cannot base staff funding on this kind of income, so we are using staff time to raise non-program money for special projects. How much staff time do we have available to donate for this? Should we apply for grants as a Job Center? But we aren't a legal entity. Guess we all have to form corporations. Can we go after them in the name of individual agencies, like Job Service? Or do we apply through the WDB? And will the funds be dispersed to the agencies that wrote the applications or on some other basis?*
- We can also do some of this. I think it is folly to base operations and staffing on this kind of a house of cards.*
- Possible, but it may be fantasy...*
- The state could provide model and parameters for Fee for Service including ability to handle money.*
- It was the consensus of the LCPT that the section on having a strategy to obtain supplemental funding should be Optional rather than required for Comprehensive Job Centers.*
- How does a Job Center accomplish this when it is not an official entity? We cannot apply for grants.*
- The Center does have individuals (partners) that write grants, etc.*
- We would recommend this be a regional approach coordinated by Workforce Development Board.*
- Would have a consistent service and fee structure within the region. For grants — many grants require a large geographic area covering multiple communities. Also do not want Job Centers expending staff time competing with each other.*

- *Fee for Service — be careful not to setup a competing structure with private companies that have expanded expertise and resource beyond ours. Seek collaborative relationship in these cases*
- *Additionally have a clear mechanism to apply the fees to local programs and these fees are considered supplemental — success will not result in decreased public funding to an area.*

21. There is evidence the Job Center has a positive relationship or partnership with local media.

- *We do, as long as we pay them well. They do provide some community interest announcements. This is a funny requirement. If you don't have this you don't have a job center?*
- *Good strong partnership in Wausau with the newspaper (partner in job fair sponsor). Very good working relationships with local televisions (Wausau and Rhinelander)*
- *On-going advertising with most media in the district...*
- *Clarification of "relationship or partnership with the media" is necessary.*
- *What constitutes "evidence"?*
- *"There is evidence the Job Center has a positive relationship or partnership with local media." What would the evidence be? We would prefer to make regional and local decisions as to the types of service best suited to each job center in our area.*
- *How does this improve the effectiveness or support the mission of the Job Center? Are we saying that DWD must have a positive relationship or partnership with the local media to operate?*
- *The Kenosha County Job Center has a positive relationship with local media. Currently we are working with local cable channel 14. Staff also appear on Gateway Technical College's WGTD radio station, on occasion, etc.*
- *Media – DWD must lift restriction on local Job Center staff who cannot talk to media without consulting Central office.*

22. There is evidence the Job Center has a positive partnership with faith-based and community services, and business organizations.

- *Will we pay for memberships?*
- *Chamber membership, several community based organizations, United Way, Salvation Army, North Central CAP.*
- *We have Chamber membership in all current locations. Job Centers sponsor 'business after five' functions in some locations.*
- *The Job Center has a positive partnership with faith-based, community and business organizations, such as CUSH and the Kenosha Area Business Alliance.*
- *No comment – actively pursuing these relationships for the past 4 years at each Job Center.*
- *Without defining "evidence" this becomes fluff...it will happen if need be.*

23. The Job Center has a Memorandum of Understanding with all partners that clearly delineates roles and responsibilities in the service delivery system.

- *I'm hoping that we will have a MOU between partners district wide to provide a district wide system of services in a few months, and it will include the Comprehensive Job Centers*
- *Being done right now.*
- *Already in place...*
- *MOU, Does DWD have a preferred model?*

- *The Job Center has a Memorandum of Understanding (MOU) which was last updated in 2000. Within the next six weeks it is going to be updated.*
- *Should be an integral part of business plan.*

General Comments about Job Center Requirements:

- *There is no money left to support my staff locating at this center.*
- *My staff is downsized, demoralized, and angry.*
- *With these proposed requirements the number of comprehensive job centers in the State of Wisconsin will dramatically decrease. Centers that become identified as either satellite centers or access points of service will not have to meet the requirements. This will lead to a two tiered system of service rather than a consistent service system.*
- *The implementation of whatever requirements are adopted needs clarification. Will a center need to meet all of the requirements or a portion of the requirements? Will having a plan in place to meet the requirements allow a center to be considered comprehensive?*
- *These proposed requirements appear to be based upon a faulty concept of a job center. It does not allow for advances in technology which do allow for distance video communication. If a center can identify electronic and video linkages to services these should be considered in the meeting of requirements rather than just looking at the physical location.*
- *WDA #6 has a cooperative one-stop delivery system in place, and our OSO committee has been working diligently to develop a WDA-wide memorandum of understanding. As is true of many areas, we are struggling with dwindling resources, increasing infrastructure costs, a large geographic and rural area, increased need for services, and visioning for a regional “system” approach to transition from a physical location approach. The certification requirements draft appears to have a bias to more centralized urban areas and does not reflect the needs of more rural areas.*
- *First, a general concern I would share is that with the wording of this document, it’s sort of suggesting that what matters most is to have generously funded/staffed operations in urban areas of a WDA. This has a huge potential negative impact on rural areas. It’s important for rural areas to sustain a delivery system that is accessible for customers throughout the WDA for in-person services. Customers in rural areas that are unemployed do not have the financial resources to travel to the larger urban areas for services, so it’s imperative that as we define the Job Center system in such a way that rural areas have the services available to their customers without having to travel large distances to get them. Rural areas also do not have public transit systems. I personally am not bothered by the fact that smaller counties do or don’t have what’s called ‘comprehensive Job Centers’. I do however have a big concern if some of the basic services are not available, face to face, for customers for things like Job Service services, DVR services, WIA services, RES etc. Rural areas already have small staffing resources, and they continue to shrink—the more they have to be shifted to the identified comprehensive sites, the larger the impact will be on the other smaller service sites within the WDA.*
- *In conclusion, certain aspects of these requirements are very prescriptive and less flexible to meet local demand.*

DWD,BWP,11/28/05