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COLLEGE

July 16, 2017

Mr. Howard Bernstein
Office of Legal Counsel
Wisconsin Department of Workforce Development
P.O. Box 7946
Madison, WI 53707-7946

VIA ELECTRONIC MAIL

Re: Proposed DWD 801, relating to workforce training grants under the WI Fast Forward program

Dear Mr. Bernstein,

Thank you for the opportunity to comment on proposed DWD 801. Madison College offers the following considerations and recommendations regarding the draft rule:

1. **DWD 801.08 (4) - 20% cap on instructional materials-** Requiring that instructional material expenditures not exceed 20% of the total match expenditure for each application may make it difficult for various partners to participate. Specifically, as it relates to the WTCS Workforce Advancement Training Grant (WAT Grant), Madison College found it difficult to pursue projects with partners interested in training that used proprietary-type materials to teach and train for nationally portable, industry recognized skills credentials such as the Manufacturing Skills Standards Certification. The WTCS addressed this issue by removing from the cap on expenditures from the grant those expenditures associated with nationally portable, industry recognized skills credentials.

Under the proposed rule, an industry partner for a project with a total cost of \$20,000, including an expected contribution from the employer of \$5,000 (representing 25% of the project costs) must limit expenditures for instructional materials to \$1,000 or less. Such a limit may make it difficult for industry partners to obtain the training they need.

Recommendation: First, allow applicable limits to be calculated on the total cost of the project rather than just the match provided by the industry partner. This is consistent with the structure of other grants. Second, permit expenditures for instructional materials associated with nationally portable, industry recognized skills credentials to be exempt from the 20% limit.

For example, under this proposed modification a project that had a total cost of \$20,000 (\$5,000 match from the industry partner plus \$15,000 from the Wisconsin Fast Forward fund) could spend \$4,000 on instructional materials. If there were instructional materials associated with a nationally portable, industry recognized skills credential, those expenditures would be entirely exempt from the 20% limit.

2. **DWD 801.11 - Reporting-** The requirement to follow-up with individuals that complete the training program and move into employment will require substantial time and resources, as once an individual is no longer directly connected to the college it is difficult to obtain this information.

Recommendation: Require applicants to collect the social security number or tax identification number of training participants and submit it to the Department to perform confirmation of employment status, the hours worked and wages earned of individuals after training program completion using the information it or the Department of Revenue maintains.

Finally, we understand that the Department will modify the proposed rule to ensure that WTCS College Districts can participate as training providers. We appreciate and support this modification.

Thank you for your consideration of Madison College's comments and recommendations. If you have further questions regarding any of these issues, please do not hesitate to contact me at 608.246.6033 or tcasper@madisoncollege.edu.

Sincerely,

Tim Casper

Tim Casper
Assistant Vice-President – Budget & Public Affairs
Madison College

