



March 30, 2018

Secretary Ray Allen
Department of Workforce Development
201 E. Washington Ave.
Madison, WI 53707-7946

Dear Secretary Allen:

The Wisconsin Workforce Development Association (WWDA) is a membership organization that consists of the eleven (11) independent Workforce Development Boards.

The Workforce Development Association thought it would provide some suggestions for consideration based on our experience in-the-field working with employers seeking to utilize the program. The WWDA views the Fast Forward Program as a valuable skills development tool for Wisconsin businesses. Below are program suggestions which would reduce bureaucratic obstacles that discourage employer interest and participation in the program:

- **Applications**
 - The Grant Program Announcement needs to have better information and instruction on the program and its intent. Due to information, many businesses rely on grant writers and/or other partners to reduce confusion on the program and how it operates.
- **Grant Awards**
 - Notifications – The pace of business is very swift. Notification of being an award recipient needs to be quickened to have notification within 30 days of grant application.
 - Retainage – The length of time and amount of fees being withheld to wait for compliance to be completed should be reviewed. Businesses and organizations administrating these funds have concerns tied to the length of time for payment.
- **Match Requirement**
 - Allow match expenditure under this chapter to be used as match to other state or federal programs. If limitations are needed, please consider removing the limitation on funding tied to special populations, which are the individuals that need the greatest upskilling to move them into full time sustainable employment.
 - The verification process of the value of In-kind contributions can be very onerous.
- **Use of Grant Funds**
 - In concert with the Wisconsin Economic Development Corporation, please review the need for a new eligible activity - potential for a company acquiring a new technology to upskill incumbent workers and new hires.
 - Limit on Administrative Costs should be increased. The true cost of creating and forming the agreements for a successful Fast Forward collaboration will not be recovered. The Administrative fee of 5% with retainage and the risk of non-compliance

makes the program too risky for financial management reasons. Recommend increase of administration up to 10%.

- Consider a dollar threshold to reduce the amount of documentation that is required for grant recipients in area's related in training supplies and materials.
 - Training supplies in a manufacturing setting are not typically purchased specifically for a training program; rather supplies are purchased as a part of doing business. Documenting expenses for specific supplies can be time consuming for business and partners in a training consortium.
 - Grantee administration payments should not be directly linked to an individual company's performance. The training consortium may change in the project scope due to a change in business operations of a participant. The grant recipient doesn't have control over third party business decisions.
 - Payroll and training participants reporting processes should be reviewed with a focus on applicant double entry or reporting redundancy.
- **Amount of Grants**
 - The payment structure of administration payments should be reviewed to reduce cashflow challenges of recipients.
 - Maximum funding per organization should be increased with potential consideration for removing this provision. If DWD wants to reduce expense of managing the program, it would seem having qualified organizations experienced in the program administration would be beneficial to the public good.

Thank you for your time and consideration of our thoughts on the Fast Forward Workforce Training program. The Wisconsin Workforce Development Association is happy to support your efforts and address any specific questions you may require clarification.

Sincerely,



Paul Decker
WWDA Board President
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