**Summary of Comments and DWD-DET's Responses | Policy Effective Date: March 1, 2022**

* 1. **Travel Policy**

1. Comment:

Suggests two different policies, one that relates to travel and one that addresses Event Hosting.

§ 200.403 Factors affecting allowability of costs.

§ 200.404 Reasonable costs.

§ 200.405 Allocable costs.

The above sections should be a part of each of the suggested policies with § 200.475 Travel costs included in the travel policies.

**Response:** DWD-DET has created two separate policies, one for travel and one for Event hosting. Evening hosting policy will be released at a later time.

1. Comment:

If out-of-state travel does not require DWD approval, SWWDB recommends removing this form from the website: WIOA Out-of-State Prior Approval Form.

**Response:**  The out-of-state travel form has been removed from the website.

1. Comment

In the past, DWD approval of conference attendance and/or professional development/ staff training was required; however, it now looks like this is not required and consideration by DWD is only required when a board wants to host an event. Can you please verify that this is indeed correct somewhere in the policy?

**Response:** The statement above is correct, DWD-DET will not require pre-approval for conferences and/or professional development/staff training.

1. Comment

Also, can DWD please address regular activities – allowable under WIOA – and please waive the approval requirement, such as One-Stop/WIOA Orientations, Job Fairs, Industry/Sector Partnerships, activities under 680.140, etc. Local boards do a lot of “convening” …bringing groups together to discuss workforce issues, employer issues, program operation/service provider meetings, policy and law changes and may include costs for beverages, snacks, sometime even lunch (think “lunch and learns”)….while lunch and learns may have a fee associated with to pay for the lunch, does staff time has to be approved by DWD for events like this? If serving beverages such coffee and water and snacks such as donuts involve a small cost for events like, is pre-approval required? Many of these are regular activities. Local boards also are included as sponsors in events that have no direct costs. We contribute as co-sponsors by providing a (staff) speaker, WIOA program or local plan information, or data on certain topics. Is pre-approval required?

**Response:** DWD-DET will not require preapproval for regular activities – allowable under WIOA in the Event Hosting Policy. Pre-approval will also not be required for snacks, small costs for regular activities allowable under WIOA. Pre-approval will also not be required for contributing as a co-sponsors b providing a (staff) speaker, WIOA program or local plan information, or date on certain topics.

1. Comment

45 day deadline – this seems appropriate for very large events that require a lot of planning and are truly local board sponsored/co-sponsored events with direct costs but when looking at the paragraphs above, many smaller convening events/activities occur so frequently that requiring a 45 day approval request seems excessive.

**Response:** DWD-DET has reduced the timeline from 45 days to 15 days in the Event Hosting Policy.

1. Comment

Please include LEO meetings specifically as events that do not require prior approval.

**Response:** DWD-DET will include LEO meetings as an event that does not require prior approval in the Event Hosting Policy.