

QUEST DWG Project Implementation Plan (PIP)

Comments & Responses

1. DWD's goal for the QUEST DWG is to provide employment and training services to at least 500 individuals. How will that number be divided between the local Workforce Development Boards (WDBs) and other subrecipients?

The Wisconsin Community Action Program Association (WISCAP) will be responsible for serving 100 individuals. The remaining 400 individuals will be served collectively by the local WDBs. This number will be divided using the same percent-shares that will be applied to QUEST DWG funding. This information has been added on p.4 of the PIP.

2. For the purpose of Disaster-Relief Employment services, can the "employer of record" be the same as the "placement site" with wages and fringe being reimbursed through an on-the-job training (OJT) and/or customized training contract?

Disaster-relief employment is not a training service, so cannot be treated the same as OJT or customized training. Both OJT and customized training are allowable services under the QUEST DWG, so can be provided, but would be managed differently from disaster-relief employment.

Disaster-relief employment is one service option for this grant but is not required.

Local WDBs are encouraged to use whatever mix of allowable services is most beneficial for their local workforce development area (WDA).

No changes to the PIP were made.

3. Must a "service provider" for the QUEST DWG be a WIOA Title I-B service provider?

No. The local WDB is empowered to operate this program director or subcontract with other entities, as needed, to carry out the terms and conditions of the award.

4. Can Disaster-Relief Employment services be delivered through "virtual" and/or "remote" employment?

There is no overall prohibition on remote and/or virtual work, however, the nature of disaster-relief employment provided using QUEST DWG funds must be related to childcare/education occupations and address the "disaster" tied to the grant (e.g., the lack of sufficient childcare availability to support workforce needs). It is unclear what type of remote and/or virtual employment may be available that meets this criterion. This could be considered on a case-by-case basis dependent on the available opportunity(ies).

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5. Must grant subrecipients align their outreach activities with DWD-DET's grant-funded, statewide outreach campaign?

No. DWD-DET's statewide outreach campaign will result in tools and materials that can be used by local areas to promote their QUEST DWG projects. However, local WDBs are not limited to the use of those tools and materials. Local WDBs are encouraged to conduct locally-led outreach efforts that meet the needs of their project plan and local communities, and are strongly encouraged to align these with state-led efforts to the extent possible.

6. Disaster-Relief Employment can be expensive (salary and fringe paid at approximately \$15.00/hour). If all QUEST DWG participant receive Disaster-Relief Employment services, this could impact a local WDBs ability to meet its participant enrollment goals. What are the expectations regarding grant budgeting and disaster-relief employment?

Disaster-relief employment is only one service option that can be provided using QUEST DWG funding, and is not required. Local WDBs are encouraged to develop a locally-driven project plan, compliant with the terms and conditions of award and the QUEST DWG PIP, that meet the needs of their local communities. This may or may not include disaster-relief employment and some mix of WIOA-allowable career, training, and supportive services. Enrollment expectations for the grant are outlined on p.4 of the PIP, and local project plans should support services for, at minimum, the expected number of participants identified.

7. One commenter identified that the allocation table did not align with the allocation methodology identified in the PIP.

DWD-DET has verified and updated these allocation numbers, and updated the allocation methodology language, in addition to adding the percent shares and planned participant enrollment numbers to the table.

8. Can individuals be served in QUEST DWG if they meet the eligibility requirements outlined in the PIP but are also already enrolled in education/training?

Yes! However, there are other available tuition assistance programs for childcare students, largely offered through the Wisconsin Early Childhood Association (WECA). Efforts should be made to coordinate funding and ensure there is no duplication.

9. Are individuals under age 18 and/or those who are attending secondary school eligible for services under the QUEST DWG?

Yes, as long as they meet the eligibility criteria outlined in the PIP. Close attention should be given to regulatory limitations on childcare work for individuals under age 18.

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10. Can self-attestation be used to document eligibility criterion related to Unemployment Insurance (UI) benefits (item #3.g on p. 7 of the PIP) and self-employment (items #4.e and 4.f on p.7 of the PIP)?

Yes. Self-attestation is acceptable for these criteria.

11. Will the QUEST DWG have unique Grant IDs in ASSET?

Yes. Each WDB will be assigned a unique Grant ID to use for QUEST DWG funded services. These are outlined below, and have been added on p. 8 of the PIP.

Local WDB	QUEST DWG Grant ID
1 – Southeastern Wisconsin	2201DWG-WI-50
2 – Employ Milwaukee	2202DWG-WI-50
3 – W-O-W	2203DWG-WI-50
4 – Fox Valley	2204DWG-WI-50
5 – Bay Area	2205DWG-WI-50
6 – North Central Wisconsin	2206DWG-WI-50
7 – Northwest Wisconsin	2207DWG-WI-50
8 – West Central	2208DWG-WI-50
9 – Western Wisconsin	2209DWG-WI-50
10 – South Central	2210DWG-WI-50
11 – Southwest Wisconsin	2211DWG-WI-50

12. If QUEST DWG participants are entered in ASSET using the Adult and/or Dislocated Worker program screens, how will grant participants be differentiated from formula-funded program participants?

The existing Adult and Dislocated Worker program screens in ASSET will be used to establish the program record for QUEST DWG participants. However, grant participants will be differentiated by using the DWG fund source and the appropriate Contract ID and/or Grant ID in ASSET service entries. This will allow QUEST DWG participants to be tracked separately from Title I Adult and Dislocated Worker program participants.

13. If QUEST DWG participants are entered in ASSET using the Adult and/or Dislocated Worker program screens, will that result in an automatic co-enrollment with those programs?

No. The existing Adult and Dislocated Worker program screens in ASSET will be used to establish a program record for the individual. However, grant participants will be differentiated by using the DWG fund source and the appropriate Contract IDs and Grant IDs in ASSET service entries. This will allow participants to be tracked separately from Title I Adult and Dislocated Worker program participants.

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Individuals may be co-enrolled in QUEST DWG and WIOA Title I Adult, Dislocated Worker, and/or Youth programs as deemed appropriate by the local WDB. Local WDBs are encouraged to co-enroll whenever prudent, however, co-enrollment is not a requirement.

14. How should eligible individuals under age 18 be reported in ASSET?

DWD-DET is working with the ASSET team to determine an appropriate data entry mechanism for these individuals. The PIP will be updated with that information once it becomes available.

15. If a grant participant is entered in ASSET using the Adult program screen then do priority of service requirements apply?

No. The existing Adult and Dislocated Worker program screens in ASSET will be used to establish the program record. However, grant participants will be differentiated by using the DWG fund source and the appropriate Contract ID and Grant ID in ASSET service entries. This will allow participants to be tracked separately from WIOA Title I Adult and Dislocated Worker program participants.

Adult program priority of service requirements will not apply unless the local WDB chooses to co-enroll QUEST DWG participants in the WIOA Title I Adult program by providing an Adult program funded participation-causing service.

16. Will DWD-DET's statewide outreach campaign be customizable to support local efforts?

This is still to be determined. DWD-DET is in the process of identifying a third-party vendor to lead this effort. Once determined, there will be a workgroup established to provide subject matter expertise on decisions of that nature. Local WDBs will have an opportunity to participate on that workgroup.

17. How will inquiries generated through DWD-DET's statewide outreach campaign be routed to local WDBs?

To be determined via the workgroup referenced in #16 above.

18. Is Disaster-Relief Employment a required service for all QUEST DWG participants?

No. Disaster-relief employment is an allowable service under the QUEST DWG but is not required.

19. Can QUEST DWG funding be used to support home childcare options?

Certain aspects of the QUEST DWG, like disaster-relief employment, must be provided in partnership with existing childcare facilities that are operating legally within the State of Wisconsin. This is not necessarily restricted to center-based childcare businesses. The language in the PIP has been updated accordingly.

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20. Many commenters had questions about the limitation on using QUEST DWG funds to support overtime hours for disaster-relief employment wages.

DWD-DET largely borrowed this language from the Disaster Recovery DWG Project Implementation Plan and cannot find any restrictions in the QUEST DWG federal guidance related to the payment of overtime hours for disaster-relief employment. This language has been revised in the PIP.

21. Is it possible to use 30 hours per week as the full-time employment threshold for the QUEST DWG to align with the Internal Revenue Service (IRS) definition of full-time employment used for the Affordable Care Act (ACA)?

DWD-DET has opted to use the full-time employment threshold established in Wisconsin Unemployment Insurance law – 32 hours per week. It is unclear what the benefit would be to reduce this threshold. Please reach out if additional discussion is needed on this item.

22. Is the employer of record required to provide health insurance to disaster-relief employees? If so, can the employer paid portion of this benefit be charged to the QUEST DWG?

Yes and yes.

23. If the local WDB uses a staffing firm to serve as the employer of record for disaster-relief employment can related staffing firm fees and benefit fees be charged to the QUEST DWG?

Yes.

24. One commenter observed that the cost of providing disaster-relief employment could be considerable, which would reduce the total number of individuals served in the grant.

DWD-DET recognizes this challenge. Local WDBs are encouraged to strike a balance between the provision of disaster-relief employment and other employment and training services in the way that best meets the needs of their local communities and provides the best value for their budget allotment.

25. Must an employer of record for disaster relief employment provide all employee fringe benefits that are available to its other full-time employees?

Yes.

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26. If a participant's disaster-relief employment hours exceed the 2080 maximum is the employer of record still obligated to pay wages for the excess hours worked?

Yes, but those hours cannot be paid using QUEST DWG funding.

27. Can the employment relationship with the individual be severed once the 2080-hour threshold has been reached?

Yes

28. Are individuals whose disaster-relief employment ends eligible to receive Unemployment Insurance (UI) benefits?

DWD-DET is consulting with DWD's Unemployment Insurance Division. Without further consultation, it is unclear whether disaster-relief unemployment would be considered "employment" for the purposes of UI eligibility since it is subsidized using federal funds.

29. The PIP states "DWD-DET requires project operators, through the employer of record, to pay for the wages and fringe benefits for hours worked by participants, even if there are no remaining subaward funds available to cover those expenses." Where would the funding come from to support this statement?

The employer of record would be responsible for funding these wages using other funding sources.

30. If a QUEST DWG participant is co-enrolled in the WIOA Title I Adult, Dislocated Worker, and/or Youth program, then why can't funding from those programs be used to fund disaster-relief employment wages and fringe?

Disaster-relief employment is a service unique to Disaster Recovery National Dislocated Worker Grants. Because it is not identified as an allowable service in the federal guidance for the WIOA Title I Adult, Dislocated Worker, and/or Youth programs, those funds cannot be used to supplement expenses related to the service.

31. Are there any other instances/situations where WIOA Title I formula funding could not be used to support a participant of the QUEST DWG?

No. Co-enrollment is allowable and encouraged. Funds can be braided across the QUEST DWG and other funding sources in any case where the services delivered are allowable under both funding sources.

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32. Are there any restrictions about disaster-relief employment placement sites being for-profit, non-profit, government, and/or religious organizations? It is generally understood that WIOA funding does not allow for work activities at religious organizations to be funded.

It is DWD-DET's understanding that the provisions outlined at [20 CFR 683.255](#) would not prevent QUEST DWG funding from supporting disaster-relief employment at a childcare center associated with a religious institution. DWD-DET has reached out to U.S. Department of Labor to confirm this interpretation.

33. What resources are available to help local WDBs verify that a childcare center is operating legally in the State of Wisconsin?

The Wisconsin Department of Children and Families (DCF) maintains a searchable list of licensed/certified childcare centers: <https://childcarefinder.wisconsin.gov/>.

DCF is also a partner on the QUEST DWG and can provide consultation as needed. Please contact DWD-DET for assistance.

34. Is a disaster-relief employment placement site required to have a supervisor on-site and/or in the same classroom as the disaster-relief employee?

There are no grant-related requirements that the placement site supervisor always be on-site or directly supervising the disaster-relief employee. However, the placement site (childcare center) is responsible to adhere to any restrictions related to its operation (e.g., regulatory requirements related to training levels, number of children per staff, etc.).

35. Is the local WDB required to competitively procure the disaster-relief employment employer of record?

There is no federal or state requirement to use competitive procurement for this purpose. Please be sure to comply with any local procurement policies that apply.

36. Do standard WIOA Title I training policies apply to the QUEST DWG in terms of maximum funding limitations?

Local WDBs may establish QUEST DWG specific training limitations, or apply their existing WIOA Title I policies. However, any QUEST DWG funding use for training services should not apply toward any overall maximum limitations established in WIOA policy (i.e., an individual could receive the maximum from QUEST DWG **and** the maximum from a WIOA Title I program).

37. Must training be available on the Eligible Training Programs List (ETPL) in order to be funded by the QUEST DWG?

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Yes, if the training is being funded using an Individual Training Account (ITA). Training may be funded using a mechanism other than an ITA (e.g., contract) if the criteria identified at [20 CFR 680.320](#) is satisfied.

38. Can QUEST DWG funding be used to pay for a Bachelor's degree? This training could be valuable to develop center administrators.

There are no restrictions in federal or state guidance related to the level of training provided. As noted in #36 above, local WDBs may choose to apply their existing WIOA Title I training policies or may opt to develop QUEST DWG specific policies. WDBs are encouraged to exercise maximum flexibility with their QUEST DWG funding to meet the needs of their local communities.

39. Please clarify whether local WDBs must apply their existing WIOA Title I supportive service policies, or can develop QUEST DWG specific supportive service policies.

DWD-DET agrees that the original PIP language on this topic was confusing. The PIP language has been updated to provide clarity. DWD-DET's intent is that the local WDB can either choose to apply their existing WIOA Title I policies or can develop policies specific to QUEST DWG funding. However, in either case, QUEST DWG funding used for supportive services should not apply toward any lifetime maximum limitations established at the local level (i.e., an individual could receive the maximum from QUEST DWG **and** the maximum from a WIOA Title I program).

40. Is it possible for DWD-DET and the local WDBs to work together to develop a QUEST DWG specific Needs-Related Payments policy?

DWD-DET reached out to U.S. DOL on this topic. U.S. DOL clarified that the QUEST DWG can be treated as a "statewide project" under [20 CFR 680.970](#). To that end, DWD-DET is in the process of developing such statewide policy and working with the Governor's Council on Workforce Investment to obtain appropriate approvals. The PIP will be updated with this information as soon as possible.

41. Is it correct that for participants who are co-enrolled in QUEST DWG and a WIOA Title I program that the WIOA Title I program should be the first funder of supportive services?

No, that is not the intent. QUEST DWG funding should be spent prior to WIOA annual formula funding. Local WDBs are also encouraged to maximize the flexibilities allowable within the QUEST DWG to provide support to participants at the highest level(s) possible.

42. The PIP states that supportive services are subject to the criteria outlined in the WIOA Title I supportive services policy, which limits the flexibility of supports available under the grant. Please clarify.

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The list of supportive services outlined in [WIOA Policy 8.6.2](#) and the related [Supportive Services – Examples and Resource Guide](#) is not intended to be exhaustive or all-inclusive. Local WDBs can, and are encouraged to, make available other types of supportive services as determined necessary based on individual assessment(s). This is the case for both the QUEST DWG and for WIOA Title I formula-funded programs.

If local supportive services policies are overly restrictive, then local WDBs are encouraged to review and evaluate those policies for additional flexibilities where available. For the purposes of the QUEST DWG, local policies that apply only to QUEST DWG funding may be developed and applied.

43. Can incentive payments and/or stipends be paid using QUEST DWG funds?

No. Unfortunately incentives and/or stipends are not allowable supportive services in the National Dislocated Worker Grant program, WIOA Title I Adult program, or WIOA Title I Dislocated Worker program. However, the local WDB may provide "needs-related payments" which DWD-DET believes may meet the same need for individuals in training. The local WDB is also encouraged to provide innovative supports to meet the needs of participants based on individual assessment(s). DWD-DET is available for consultation on specific supports to ensure they are allowable under Uniform Guidance and WIOA restrictions.

44. Should QUEST DWG participants automatically be enrolled in the WIOA Title I Dislocated Worker program?

No. Participants may be co-enrolled in the QUEST DWG and WIOA Title I Dislocated Worker program if they meet the eligibility criteria for both programs. However, eligibility should be determined for each program independently. Co-enrollment should not occur "automatically."

Participants may also be enrolled in other WIOA Title I programs and/or other grants, including the Statewide Employment Recovery Dislocated Worker Grant and Support to Communities grant, if they meet the eligibility criteria for those programs.

Local WDBs are empowered to braid funding for co-enrolled participants to maximize the funding and services available to participants, and maximize their local budgets.

45. Are project operators and/or service providers required to use the Participant Placement Agreement outlined in Appendix A, or can they use similar forms used for WIOA Title I work experience services?

If the project operator and/or service provider is providing disaster-relief employment services, then the Participant Placement Agreement in Appendix A of the PIP must be used.

Please note that disaster-relief employment is different from work experience and/or work-based training services otherwise allowable under WIOA Title I programs.

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46. If WIOA Youth program participants are eligible to receive services under the QUEST DWG, then is it necessary to provide and document the occupational and academic education components for the work experience?

If a work experience service is provided using QUEST DWG funds then it would be considered an individualized career service for Adults and Dislocated Workers as identified at [20 CFR 678.430\(b\)\(7\)](#). This does not carry the same requirements as the Work Experience program element in the WIOA Youth program, so the occupational and academic education components would not be required.

Please note that disaster-relief employment is a different service that is not a Work Experience or a work-based learning service, so does not include an educational component.

47. One commenter identified that the Terms and Conditions outlined in the Appendices of the PIP are missing certain required EO/CR assurances.

Thank you for bringing this oversight to our attention! This has been corrected.

48. Can DWD-DET provide clarity around how the various grant partners and subrecipients will work together to support the outcomes and systemic changes outlined in the QUEST DWG grant proposal?

This work is ongoing and will require input and collaboration from all partners. DWD-DET is working to establish monthly conference calls that will convene these partners to establish relationships, identify opportunities, and ultimately answer this question.