

Grow Today, Invest in Tomorrow

September 20, 2011

Scott Baumbach, Secretary
 Wisconsin Department of Workforce Development
 201 E. Washington Avenue, A400
 Madison, Wisconsin 53707-7946

Dear Secretary Baumbach:

We, along with the chief elected official of the area and providers receiving funds under Title I of the Workforce Investment Act (WIA), are responsible for complying with all fiscal controls established in section 184 of WIA.

We assure that funds are spent in accordance with WIA legislation, regulations, written DOL guidance, DET guidance, and all other applicable federal and state laws.

We are providing this letter in connection with our role as a grant recipient under the state and federal workforce development programs. We confirm the following representations made to the Wisconsin Department of Workforce Development.

1. We are responsible for maintaining complete, accurate, and timely financial statements for the Southwest Wisconsin Workforce Development Board. We have submitted to DWD the most recent audited financial statements and will submit to DWD audited financial statements in January 31, 2012 for the fiscal year ending June 30, 2011 that are free from material misstatement.
2. We have disclosed to the auditor and the Department of Workforce Development the methods and significant assumptions used in preparing the financial statements for the Southwest Wisconsin Workforce Development Board, including changes to these methods of accounting and reporting and/or assumptions from the previous year.
3. We are responsible for complying with the tax laws of the United States and the State of Wisconsin. We will submit a copy of the agency tax return for the year ended June 30, 2011 at the same time it is submitted to the IRS.
4. As part of our oversight of our Workforce Investment Act designated one-stop operator, we have received, reviewed, and submitted to the Department of Workforce Development a copy of the one-stop operator's most recent federal tax return where the one-stop operator is not a consortium of public agencies.
5. We are responsible for understanding and complying with the requirements of laws, regulations, and the provisions of contracts and grant agreements related to all grants and contracts issued by Department of Workforce Development. We have assigned costs to federal grants consistent with the requirements of OMB Circular A-87 and A-122. All costs assigned to federal grants are reasonable, conform to the limitations and/or exclusions set forth in the grant, are determined using generally accepted accounting principles, and are adequately documented.

6. Federal grants do not include any costs which are unnecessary, do not directly benefit the programs, or are unallowable under the applicable Federal cost principles (e.g., public relations, bad debts, entertainment costs, fines and penalties, general government expenses, interest)
7. We will prepare and submit to DWD a full copy of the A-133 audit for fiscal year ending June 30th, 2011 including the related Schedule of Federal Financial Assistance. We will include expenditures made during FY 2010-11 for all awards provided by federal agencies in the form of grants, federal cost reimbursement contracts, loans, loan guarantees, property (including donated surplus property), cooperative agreements, interest subsidies, insurance, food commodities, direct appropriations, and other assistance. Where applicable, we separately identified on the schedule those expenditures funded by the 2009 American Recovery and Reinvestment Act (ARRA).
8. We are responsible for establishing and maintaining, and have established and maintained, effective internal control over compliance for all state and federal programs that provides reasonable assurance that the Southwest Wisconsin Workforce Development Board is managing state and federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of the Department of Workforce Development's programs.
9. We are responsible for the design and implementation of programs and controls to prevent and detect fraud.
10. We have made available all contracts and grant agreements (including amendments, if any) to the auditor and the Department of Workforce Development that have a material impact on state and federal workforce development programs.
11. We have identified and disclosed to the auditor and the Department of Workforce Development all amounts questioned and all known noncompliance with the direct and material compliance requirements of state and federal grants and/or contracts. The current status of any unresolved disallowances and potential disallowances has been provided to the auditor and the Department of Workforce Development.
12. We have disclosed to the auditor and the Department of Workforce Development any communications from grantors and pass-through entities concerning possible noncompliance with the direct and material compliance requirements.
13. We have disclosed to the auditor and the Department of Workforce Development the findings received and related corrective actions taken for previous audits, attestation engagements, and internal or external monitoring that directly relate to the objectives of the compliance audit.
14. We have provided to the auditor and the Department of Workforce Development our interpretations of any compliance requirements that are subject to varying interpretations.
15. We have informed subrecipients of the appropriate state and federal award and compliance requirements including, if applicable, additional ARRA-specific information and requirements and the amount of financial assistance subject to these additional requirements.
16. We have verified that subrecipients receiving assistance under ARRA are registered in the Central Contractor Registration and have obtained their Dun Bradstreet Data Universal Numbering System (DUNS) numbers.

17. We have monitored the subrecipient Southwest Wisconsin Workforce Development Board to determine whether the subrecipient has expended financial assistance in accordance with applicable laws and regulations.
18. If applicable, we have issued and submitted a copy of management decisions to DWD on a timely basis after our receipt of subrecipients' auditor's reports that identified noncompliance with state and federal laws, regulations, or the provisions of contracts or grant agreements, and have ensured that subrecipients have taken the appropriate and timely corrective action on findings.
19. If applicable, we have considered the results of subrecipient audits and have made any necessary adjustments to the Southwest Wisconsin Workforce Development Board's own books and records.
20. We have disclosed to DWD any and/or all political contributions made by the Southwest Wisconsin Workforce Development Board.
21. We have disclosed to the auditor and the Department of Workforce Development all transactions with any entity in which a Southwest Wisconsin Workforce Development Board member or executive has greater than a 5% equity interest.
22. We have disclosed to the auditor and the Department of Workforce Development all Southwest Wisconsin Workforce Development Board staff and staff direct family members receiving assistance under Southwest Wisconsin Workforce Development Board directed programs funded by state and/or federal grants or contracts.
23. We have no knowledge of any fraud or suspected fraud affecting the Southwest Wisconsin Workforce Development Board involving:
 - a. Management;
 - b. Employees who have a significant role in internal control; or
 - c. Others where the fraud could have a material effect on the audit financial statements or the Schedule of Expenditures of Federal Awards.
24. We have no knowledge of any allegations of fraud or suspected fraud affecting the Southwest Wisconsin Workforce Development Board received in communications from employees, former employees, analysts, regulators, or others.
25. We have obtained and submitted to DWD conflict of interest forms signed by each board member.
26. We comply with the Fiscal Controls established in Section 184 of WIA.
27. We assure that funds will be spent in accordance with WIA legislation, regulations, written DOL Guidance, Division of Employment and Training (DET) Guidance and all other applicable federal and state laws.
28. We comply with the nondiscrimination provisions of WIA section 188, including an assurance that a Methods of Administration. We will provide to DWD the data necessary to show compliance with the nondiscrimination provisions of WIA section 188 upon reasonable request.

September 20, 2011

Page 4


29. We provide veterans priority access to employment and training activities authorized in section 134 of WIA and will provide DWD with data necessary to show compliance with Section 134 upon reasonable request.
30. We will make WIA participants aware of a full range of career choices including orienting and exposing them to training and jobs with family-supporting wages.
31. We make financial literacy training/information available for all participants.
32. We do not use funds received under WIA to assist, promote, or deter union organizing.
33. We comply with section 504 of the Rehabilitation Act of 1973 and the American's with Disabilities Act of 1990, as amended.
34. We developed the local workforce plan in consultation with the business community, labor organizations, and required partners.
35. We share all WDB and LEO Consortium meeting agendas and minutes with DET staff.
36. We will implement and abide by the Comprehensive Job Center Standards for all comprehensive job centers and assure the other service locations in the One Stop Service Delivery System follow the standards, as applicable.
37. We do not spend WIA funds on the development or operation of any data management systems that duplicate systems provided by the State of Wisconsin, especially ASSET, WorkNet, or Job Center of Wisconsin.
38. We developed a Continuity of Operations Plan (COOP) that outlines the methods by which the Board will function and services will be provided during a critical incident or pandemic, including:
 - Provisions for continuation of employment and training services under the WIA and other programs or services funded by the DWD as possible during a critical incident or pandemic as well as the restoration of full services when services have had to be limited or interrupted for a period of time.
 - Oversight of the status and activity of the WDA's Job Center sites during a critical incident or pandemic, including regular status reports to DET Services COOP Branch Director or designee as required.
 - Full cooperation with the DWD, DET Services in the preparation or implementation of a COOP as specified, including submittal of the Board's updated COOP Plan in April of each year upon request, and participation in COOP drills such as call trees, tabletop exercises and other plan reviews as scheduled.
 - We provide veterans priority access to employment and training activities authorized in section 134 of WIA and will provide DWD with data necessary to show compliance with Section 134 upon reasonable request.

We comply with state program priorities and directives set out in the state plan and any subsequent modifications.

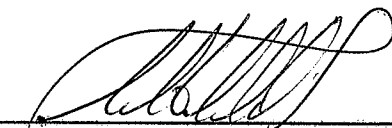
To the best of our knowledge and beliefs, no events have occurred that would require adjustment to or disclosure to the audit financial statements of the Southwest Wisconsin Workforce Development Board or the Schedule of Expenditures of Federal Awards.




Art Carter, Chief Local Elected Official
Southwest Wisconsin Workforce Development Board



Robert T. Borremans, Chief Executive Officer
Southwest Wisconsin Workforce Development Board



Scott Stocker, Chair
Southwest Wisconsin Workforce Development Board



Annette Meudt, Finance Director (Chief Financial Officer)
Southwest Wisconsin Workforce Development Board

