



September 8, 2021

Ms. Janell Knutson
Department of Workforce Development
Director, Bureau of Legal Affairs
Division of Unemployment Insurance

Submitted via email: Janell.Knutson@dwd.wisconsin.gov

Relating to: *Protecting Wisconsin employers from the adverse financial effects of COVID-19, support for new Emergency Rules DWD 102, 113 and 123*

Dear Ms. Knutson,

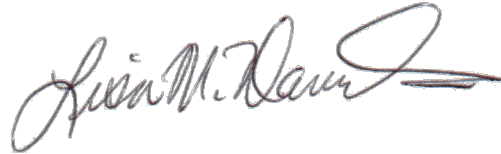
Thank you for the opportunity to review and provide comment on the proposed Emergency Rules DWD 102, 113 and 123. DSPN is the state's leading trade association for organizations that provide support to people with disabilities. DSPN represents the interests of disability service providers that provide both residential and non-residential services. These services include community-based and center-based vocational and day services, supported employment, job development, training and placement, competitive integrated employment, care management, Community Based Residential Facilities (CBRFs), Adult Family Homes (AFHs), supported living arrangements, Adult Day Care Center (ADCC) services, early intervention, and other services that enable people with disabilities and economic disadvantages to live and work in their local communities.

As you can imagine, DSPN members continue to recover from the devastating health and economic impacts from COVID-19. Our members are grateful to both the Evers and Biden Administrations for the timely assistance provided to maintain access to services for our most vulnerable. Given the ever-changing dynamics of the pandemic, any relief available to our members is welcome. We appreciate the continued focus on relief for charging of UI benefits and support these proposed Emergency rules.

Throughout the pandemic, members have inquired about UI benefits, their responsibilities, and changes in federal law. We strongly support the new emergency rules to provide for interest waivers for reimbursable employers until after Department has finished the process of relieving employers of benefit charges related to the public health emergency. Additionally, we support the intent of the rule to provide further relief by waiving interest for reimbursable employers for a limited period after charging relief is completed so that employers have an opportunity to review the revised amount due and set up a payment plan, if necessary.

Please contact me with any questions you or your staff may have. Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lisa M. Davidson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lisa M. Davidson
CEO