

OKLAHOMA PYS 2024-2027 MODIFICATION

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OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

OPTIONS FOR SUBMITTING A STATE PLAN

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application

for that particular program. If included, Combined State Plan partner programs are subject to the “common planning elements” (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) ¹

[1] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State’s economic conditions, workforce characteristics, and workforce development activities. These

analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.

- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
 - State Strategy Implementation,
 - State Operating Systems and Policies,
 - Assurances,
 - Program-Specific Requirements for the Core Programs, and
 - Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.² States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

Paperwork Reduction Act: The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

[2] Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

Unified or Combined State Plan. Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

Unified State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

Combined State Plan. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below.

This is a combined plan. The submitted modification is consistent with TEGL 07-25, which provides federal guidance for Workforce Innovation and Opportunity Act State Plan modifications for Program Years 2026 and 2027. While career and technical education programs authorized under the *Strengthening Career and Technical Education for the 21st Century Act (Perkins V)* are not included as part of Oklahoma's Combined Plan at this time, Oklahoma maintains a strong and active partnership with the Oklahoma Department of Career and Technology Education. CareerTech plays a central role in the state's workforce training ecosystem, and ongoing coordination between the workforce system and CareerTech supports alignment of career pathways, industry-recognized credentialing, and employer-driven training initiatives.

COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

No

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

No

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

Yes

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

No

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

No

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

Oklahoma submits this Combined Strategic Four-Year Workforce Development Plan under the Workforce Innovation and Opportunity Act (WIOA), administered by the Oklahoma Employment Security Commission (OESC) in partnership with the Oklahoma Department of Rehabilitation Services and the Oklahoma Department of Career and Technology Education. This modification is submitted consistent with TEGL 07-25 and reflects both federal priorities for Program Years 2026–2027 and the substantial system transformation work undertaken by the State over the past three years.

Through sustained partner engagement, including statewide partner meetings, structured sprint sessions, cross-agency planning activities, and ongoing guidance from the Governor’s Council for Workforce and Economic Development and the Oklahoma Workforce Commission, Oklahoma has examined how workforce programs operate collectively and where alignment, accountability, and effectiveness can be strengthened. This work surfaced longstanding fragmentation across agencies and programs and established a shared understanding that incremental coordination alone was insufficient to meet the needs of employers, job seekers, and communities.

In response, Oklahoma is actively transitioning toward a workforce system organized around core functions rather than isolated programs. This transformation aligns with five key workforce priorities emphasized by the U.S. Department of Labor and reflected throughout this Plan: industry-driven strategies, worker mobility, integrated systems, accountability for outcomes, and flexibility to support innovation.

Industry-Driven Strategies. Oklahoma’s workforce strategy is grounded in employer demand and informed by robust labor market analysis. Employers play a central role in identifying in-demand skills, validating training models, and informing investments aligned to priority

industries and occupations. The State emphasizes sector strategies, credentials of value, career pathways, and work-based learning approaches to ensure workforce investments prepare individuals for secure, well-paying, and high-need jobs across Oklahoma's economy.

Worker Mobility. The State's workforce system is designed to support economic mobility by enabling individuals to progress along clearly defined career pathways that lead to higher wages and long-term self-sufficiency. Oklahoma prioritizes informed customer choice, stackable and portable credentials, and data-driven service delivery to help individuals navigate education, training, and employment opportunities and advance within the labor market.

Integrated Systems. Oklahoma's transformation efforts prioritize a unified and navigable workforce system that reduces duplication, streamlines service delivery, and improves coordination across agencies and funding streams. Through system mapping, coordinated policy guidance, functional planning, and expanded use of virtual service delivery, the State is strengthening alignment while maintaining continuity of services and statutory roles as governance decisions are phased and implemented consistently with WIOA.

Accountability. Accountability for outcomes remains central to Oklahoma's workforce strategy. The State is focused on improving transparency, strengthening performance monitoring, and ensuring public investments are directed toward strategies that demonstrate positive employment, earnings, and credential outcomes. These efforts support responsible stewardship of taxpayer resources and continuous improvement across the workforce system.

Flexibility and Innovation. Oklahoma continues to leverage statutory authority, waivers, and phased implementation approaches to promote flexibility and innovation within the workforce system. This adaptability allows the State to pilot new models, respond to evolving labor market conditions, and support long-term system durability while remaining compliant with federal requirements.

As part of this broader transformation, Oklahoma has initiated formal consultation regarding the Governor's intent to designate a single statewide local workforce development area. Designation will be implemented in phases to ensure continuity of services and system stability. This Plan modification reflects ongoing analysis and consultation associated with that intent but does not pre-determine final governance outcomes.

Together, these efforts reflect Oklahoma's commitment to building a workforce system that is demand-driven, equitable, accountable, and resilient, one that aligns education, training, and employment services to support business growth, talent development, and economic mobility statewide, and positions Oklahoma for sustained success over time.

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II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State’s current economic environment and identifies the State’s overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. Where requirements identify the term “populations”, these must include individuals with barriers to employment as defined at WIOA Section 3. This includes displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State’s workforce system and programs will operate.

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include—

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which there is existing demand.

II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which demand is emerging.

III. EMPLOYERS’ EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

The detailed occupational and industry projections below provide the empirical foundation for the State’s strategic priorities, sector strategies, and workforce investment decisions described in subsequent sections.

Existing Demand Industry Sectors and Occupations

Total employment in Oklahoma is projected to grow by 4.83% between 2022 and 2032. The Goods Producing portion of the economy is expected to lag overall employment by gaining 2.55% - expected softness in Manufacturing will mitigate gains in Construction. Per the forecast most employees will continue to be employed by one of the many industries in the giant Services-Providing sector which will grow by 5.48%. Within its ranks, however, there is a remarkable diversity in expected outcomes from Leisure & Hospitality's 9.5% surge to employ more than 200,000 Oklahomans to the relatively stable conditions in Other Services (+1.09). Cutbacks in federal and state government employment are expected to reduce overall public sector payrolls even with the gains coming from local entities.

At the occupational level the growth is expected to be faster in the fields where some kind of university degree is required. Jobs that require an Associate's, Bachelor's, Master's, Professional, and Doctorate should all be growing faster than the overall state economy. However, there is also considerable demand for workers who have non-degree Postsecondary Awards. Occupations that typically need only High School graduates or individuals with only "Some College" are projected to grow at a much slower rate than fields that require some form of degree or post-secondary accreditation or certification.

June 2025 Industry LQ			
	Employment	Average Weekly Wage	Employment LQ
NAICS 2111 Oil and gas extraction	11,666	\$2,629	8.82
NAICS 4862 Pipeline transportation of natural gas	2,559	2,618	6.54
NAICS 4869 Other pipeline transportation	466	2,346	5.89
NAICS 1122 Hog and pig farming	1,654	1,030	5.49
NAICS 2131 Support activities for mining	16,137	1,850	5.46
NAICS 3334 Ventilation, heating, air-conditioning, and commercial refrigeration equipment manufacturing	8,502	1,354	5.26
NAICS 3324 Boiler, tank, and shipping container manufacturing	5,297	1,761	4.99
NAICS 3274 Lime and gypsum product manufacturing	724	1,440	3.98
NAICS 3331 Agriculture, construction, and mining machinery manufacturing	8,399	1,564	3.7
NAICS 3262 Rubber product manufacturing	4,622	1,696	3.23
NAICS 3352 Household appliance manufacturing	1,960	909	3.05
NAICS 4245 Farm product raw material merchant wholesalers	1,984	885	2.49

NAICS 3312 Steel product manufacturing from purchased steel	1,568	1,422	2.44
NAICS 3111 Animal food manufacturing	2,004	1,393	2.43
NAICS 3221 Pulp, paper, and paperboard mills	2,217	1,829	2.41
NAICS 3271 Clay product and refractory manufacturing	849	1,099	2.27
NAICS 3253 Pesticide, fertilizer, and other agricultural chemical manufacturing	914	2,340	2.26
NAICS 3364 Aerospace product and parts manufacturing	13,608	1,859	2.2
NAICS 2212 Natural gas distribution	2,676	2,010	2.08
NAICS 3272 Glass and glass product manufacturing	1,744	1,506	2.05
NAICS 3241 Petroleum and coal products manufacturing	2,397	2,460	2

Emerging Demand Industry Sectors and Occupations

This section provides data-driven insight into the industries and occupations in Oklahoma with significant employment concentration, using official statistics from the Oklahoma Employment Security Commission, the Bureau of Labor Statistics, and the U.S. Census Bureau.

Information included:

- Industries with Heavy Concentration in the State
- Occupations with a Heavy Concentration in the State (June 2025 Occupation LQ)
- Statewide Long-Term Industry Projections, 2022 – 2032
- Statewide Long-Term Occupational Projections, 2022-2032

Industries with a Heavy Concentration in Oklahoma

Oklahoma continues to show a strong concentration in energy-related industries. Based on 4-digit NAICS codes, several sectors in the state have an employment Location Quotient (LQ) of 2.0 or higher and employ at least 500 workers, indicating a workforce density at least twice the national average.

Top concentrated industries include:

- Oil and Gas Extraction (NAICS 2111) – LQ: 8.82, Employment: 11,666, Avg. Weekly Wage: \$2,629
- Pipeline Transportation of Natural Gas (NAICS 4862) – LQ: 6.54, Employment: 2,559, Avg. Weekly Wage: \$2,618
- Other Pipeline Transportation (NAICS 4869) – LQ: 5.89, Employment: 466, Avg. Weekly Wage: \$2,346
- Hog and Pig Farming (NAICS 1122) – LQ: 5.49, Employment: 1,654, Avg. Weekly Wage: \$1,030
- Support Activities for Mining (NAICS 2131) – LQ: 5.46, Employment: 16,137, Avg. Weekly Wage: \$1,850

These figures illustrate Oklahoma's deep-rooted strength in the energy and agriculture sectors, particularly in oil and gas, pipeline transportation, and livestock farming.

Occupations with a Heavy Concentration in Oklahoma

Occupational data highlights roles with high employment density and a workforce of at least 100 individuals, using a threshold LQ of 3.0.

Most concentrated occupations include:

- Gambling Surveillance Officers (SOC 33-9031) – LQ: 12.17, Employment: 1,330, Mean Annual Wage: \$38,390
- Gambling Cage Workers (SOC 43-3041) – LQ: 11.34, Employment: 1,680, Mean Annual Wage: \$29,720
- Rotary Drill Operators, Oil and Gas (SOC 47-5012) – LQ: 10.96, Employment: 1,570, Mean Annual Wage: \$66,350
- Forest Fire Inspectors (SOC 33-2022) – LQ: 10.94, Employment: 330, Mean Annual Wage: \$77,680
- Tire Builders (SOC 51-9197) – LQ: 8.11, Employment: 1,870, Mean Annual Wage: \$62,650

These occupations reflect the state's strong alignment with sectors like energy, gaming, and manufacturing.

Here we are illustrating occupations that have LQs of at least 3.0 and at least 100 employees:

June 2025 Occupation LQ				
Occupation Title	Employment	Employment LQ	Hourly Average Wage	Annual Average Wage
Gambling Surveillance Officers and Gambling Investigators	1,330	12.17	18.46	38,390
Gambling Cage Workers	1,680	11.34	14.29	29,720
Rotary Drill Operators, Oil and Gas	1,570	10.96	31.90	66,350
Forest Fire Inspectors and Prevention Specialists	330	10.94	37.34	77,680
Tire Builders	1,870	8.11	30.12	62,650
Rock Splitters, Quarry	260	7.75	21.32	44,340
Geological Technicians, Except Hydrologic Technicians	750	7.01	25.47	52,980
Agricultural Engineers	120	6.30	44.24	92,010
Petroleum Engineers	1,290	6.22	76.83	159,810
Roustabouts, Oil and Gas	3,080	6.19	22.34	46,470
Service Unit Operators, Oil and Gas	2,910	6.01	29.14	60,600
Derrick Operators, Oil and Gas	710	5.88	27.30	56,790
Gas Plant Operators	980	5.61	36.31	75,520
Explosives Workers, Ordnance Handling Experts, and Blasters	340	5.45	26.61	55,340
Aircraft Mechanics and Service Technicians	8,020	5.36	37.99	79,010
Gambling Managers	260	5.08	35.49	73,810

Gambling and Sports Book Writers and Runners	410	4.90	14.60	30,360
Gambling Change Persons and Booth Cashiers	1,160	4.81	13.89	28,880
New Accounts Clerks	1,790	4.30	21.32	44,350
Agricultural Sciences Teachers, Postsecondary	410	4.29	*	69,820
First-Line Supervisors of Gambling Services Workers	1,150	4.10	26.42	54,960
Helpers--Extraction Workers	300	4.06	21.62	44,960
Cleaning, Washing, and Metal Pickling Equipment Operators and Tenders	610	3.99	19.61	40,790
Coin, Vending, and Amusement Machine Servicers and Repairers	1,220	3.92	20.71	43,080
Geoscientists, Except Hydrologists and Geographers	910	3.69	58.49	121,650
Electric Motor, Power Tool, and Related Repairers	670	3.67	19.75	41,070
Petroleum Pump System Operators, Refinery Operators, and Gaugers	1,340	3.50	43.68	90,860
Excavating and Loading Machine and Dragline Operators, Surface Mining	1,270	3.39	22.83	47,480
Environmental Engineering Technologists and Technicians	450	3.31	29.19	60,710
Health and Safety Engineers, Except Mining Safety Engineers and Inspectors	800	3.16	51.24	106,580

Oklahoma Long-Term Industry Employment Projections, 2022-2032				
	Employment		Employment Change	
Industry Title	2022	2032	Numeric	Percent
Total All Industries¹	1,826,010	1,914,270	88,270	4.83
Goods Producing	263,920	270,640	6,720	2.55
Natural Resources and Mining	51,040	53,620	2,580	5.05
Construction	79,780	84,200	4,420	5.54
Manufacturing	133,100	132,820	-280	-0.21
Services Providing	1,465,800	1,546,170	80,370	5.48
Trade, Transportation, and Utilities	321,730	336,370	14,640	4.55
Information	17,790	17,670	-120	-0.69
Financial Activities	81,500	83,700	2,210	2.71
Professional and Business Services	205,230	220,900	15,680	7.64
Education and Health Services	403,550	425,570	22,030	5.46
Leisure and Hospitality	193,090	211,440	18,350	9.50

Other Services (except Government)	69,140	69,870	730	1.06
Government	173,780	180,640	6,860	3.95
Self Employed and Unpaid Family Workers, All Jobs²	96,290	97,460	1,170	1.22
Agriculture, Forestry, Fishing and Hunting³	20,600	20,610	10	0.01
Mining	30,440	33,010	2,580	8.46
Oil and Gas Extraction	11,970	13,040	1,070	8.93
Mining (except Oil and Gas)	2,160	2,200	50	2.23
Support Activities for Mining	16,320	17,770	1,460	8.94
Utilities	9,700	10,690	990	10.24
Construction	79,780	84,200	4,420	5.54
Construction of Buildings	15,070	17,550	2,480	16.43
Heavy and Civil Engineering Construction	15,930	16,230	300	1.91
Specialty Trade Contractors	48,780	50,420	1,640	3.36
Manufacturing	133,100	132,820	-280	-0.21
Food Manufacturing	19,680	20,620	940	4.79
Beverage and Tobacco Product Manufacturing	2,380	2,230	-150	-6.36
Textile Mills	180	160	-20	-10.67
Textile Product Mills	550	490	-60	-11.15
Apparel Manufacturing	500	360	-130	-26.87
Leather and Allied Product Manufacturing	130	120	-10	-9.3
Wood Product Manufacturing	2,060	2,040	-20	-1.11
Paper Manufacturing	3,450	3,340	-110	-3.05
Printing and Related Support Activities	2,530	2,220	-300	-11.99
Petroleum and Coal Products Manufacturing	2,130	2,090	-30	-1.6
Chemical Manufacturing	4,290	4,400	100	2.4
Plastics and Rubber Products Manufacturing	10,140	10,060	-80	-0.78
Nonmetallic Mineral Product Manufacturing	6,900	6,770	-130	-1.93
Primary Metal Manufacturing	3,400	3,370	-30	-0.94
Fabricated Metal Product Manufacturing	21,240	21,140	-110	-0.49
Machinery Manufacturing	22,690	22,860	170	0.74

Computer and Electronic Product Manufacturing	3,390	3,480	90	2.75
Electrical Equipment, Appliance, and Component Manufacturing	3,430	3,420	-10	-0.35
Transportation Equipment Manufacturing	18,740	18,430	-320	-1.7
Furniture and Related Product Manufacturing	2,250	2,190	-60	-2.53
Miscellaneous Manufacturing	3,060	3,060	-10	-0.2
Wholesale Trade	57,310	58,360	1,050	1.83
Merchant Wholesalers, Durable Goods	29,380	30,290	910	3.09
Merchant Wholesalers, Nondurable Goods	21,170	21,310	140	0.64
Wholesale Electronic Markets and Agents and Brokers	6,750	6,760	10	0.1
Retail Trade	184,540	191,480	6,940	3.76
Motor Vehicle and Parts Dealers	26,500	26,710	210	0.79
Building Material and Garden Equipment and Supplies Dealers	19,500	21,660	2,170	11.13
Food and Beverage Retailers	23,960	24,700	740	3.11
Furniture, Home Furnishings, Electronics, and Appliance Retailers	9,020	9,430	400	4.48
General Merchandise Retailers	44,630	45,740	1,110	2.49
Health and Personal Care Retailers	11,540	11,950	400	3.49
Gasoline Stations and Fuel Dealers	20,710	22,560	1,850	8.93
Clothing, Clothing Accessories, Shoe, and Jewelry Retailers	9,400	9,400	0	-0.03
Sporting Goods, Hobby, Musical Instrument, Book, and Miscellaneous Retailers	19,280	19,330	50	0.26
Transportation and Warehousing	70,190	75,840	5,650	8.05
Air Transportation	1,710	1,870	150	8.93
Rail Transportation ⁴	2,010	2,010	0	0
Truck Transportation	19,170	20,700	1,530	8
Transit and Ground Passenger Transportation	*	*	*	*
Pipeline Transportation	3,690	3,960	260	7.15
Scenic and Sightseeing Transportation	*	*	*	*
Support Activities for Transportation	6,930	7,270	350	5.04
Couriers and Messengers	9,760	10,630	870	8.94
Warehousing and Storage	25,870	28,190	2,310	8.94
Information	17,790	17,670	-120	-0.69

Motion Picture and Sound Recording Industries	1,800	1,900	100	5.63
Publishing Industries	2,870	2,530	-340	-11.9
Broadcasting and Content Providers	2,670	2,690	20	0.64
Telecommunications	8,100	7,940	-160	-1.98
Computing Infrastructure Providers, Data Processing, Web Hosting, and Related Services	1,880	2,050	170	8.95
Web Search Portals, Libraries, Archives, and Other Information Services	480	570	90	19.38
Finance and Insurance	59,960	61,340	1,380	2.3
Monetary Authorities Central Bank	*	*	*	*
Credit Intermediation and Related Activities	31,660	31,830	170	0.54
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	5,200	5,340	140	2.67
Insurance Carriers and Related Activities	22,980	24,050	1,060	4.63
Funds, Trusts, and Other Financial Vehicles	*	*	*	*
Real Estate and Rental and Leasing	21,540	22,370	830	3.83
Real Estate	13,110	13,880	760	5.8
Rental and Leasing Services	8,280	8,330	50	0.63
Lessors of Nonfinancial Intangible Assets (except Copyrighted Works)	150	160	10	8.78
Professional, Scientific, and Technical Services	80,370	86,740	6,370	7.93
Management of Companies and Enterprises	22,120	24,270	2,140	9.69
Administrative and Support and Waste Management and Remediation Services	102,730	109,900	7,170	6.97
Administrative and Support Services	98,600	105,710	7,120	7.22
Waste Management and Remediation Service	4,140	4,180	50	1.14
Educational Services	160,240	163,850	3,610	2.25
Health Care and Social Assistance	243,300	261,730	18,420	7.57
Ambulatory Health Care Services	79,870	87,000	7,140	8.93
Hospitals	93,550	96,550	3,010	3.21

Nursing and Residential Care Facilities	31,530	34,680	3,150	9.98
Social Assistance	38,360	43,500	5,130	13.38
Arts, Entertainment, and Recreation	37,250	40,600	3,350	8.98
Performing Arts, Spectator Sports, and Related Industries	3,310	3,670	360	10.92
Museums, Historical Sites, and Similar Institution	1,510	1,600	90	5.75
Amusement, Gambling, and Recreation Industries ⁵	32,430	35,330	2,900	8.94
Accommodation and Food Services	155,840	170,850	15,010	9.63
Accommodation, including Hotels and Motels	13,420	15,700	2,280	16.99
Food Services and Drinking Places	142,420	155,150	12,730	8.94
Other Services (except Government)	69,140	69,870	730	1.06
Repair and Maintenance	16,630	17,100	460	2.78
Personal and Laundry Services	12,780	12,690	-90	-0.69
Religious, Grantmaking, Civic, Professional, and Similar Organizations	38,840	39,200	370	0.94
Private Households	890	880	-10	-0.79
Government	173,780	180,640	6,860	3.95
Total Federal Government Employment	50,740	50,630	-110	-0.22
Federal Government, Excluding Post Office	43,950	44,000	50	0.11
Postal Service	6,790	6,630	-160	-2.37
State Government, Excluding Education and Hospitals	31,910	31,600	-310	-0.97
Local Government, Excluding Education and Hospitals	91,140	98,420	7,280	7.99

Employers' Employment Needs

Oklahoma's labor market continues to reflect both the state's traditional economic strengths and its evolving priorities. Employers in goods-producing industries, construction, energy, and manufacturing are seeking workers with specialized technical skills, hands-on experience, and industry-recognized credentials. For example:

- **Construction:** Employers increasingly need workers certified in trades such as welding, HVAC, and electrical, with safety certifications (e.g., OSHA 10/30) as baseline requirements.
- **Energy:** Oil and gas extraction, drilling, and pipeline transportation occupations demand workers with technical proficiency in equipment operation, mechanical troubleshooting,

and environmental/safety compliance. CDL licensure and advanced technical certifications remain critical.

- **Manufacturing:** Employers report demand for CNC machinists, tire builders, and process technicians, requiring postsecondary certificates, apprenticeships, or industry-recognized credentials.

Within the service-providing sector, projected to grow by 5.48%, health care and leisure/hospitality are particularly prominent:

- **Health Care:** The need for registered nurses, medical assistants, and allied health professionals is growing rapidly. These occupations require degrees or licensure (e.g., RN, LPN, CMA, CNA). Employers emphasize both clinical knowledge and soft skills such as communication, empathy, and teamwork.
- **Leisure & Hospitality:** With a projected 9.5% surge, employers need workers skilled in customer service, digital reservations platforms, and hospitality management. Although many positions require only a high school diploma, stackable credentials in culinary arts or hospitality management can improve retention and advancement.

Across sectors, employers are clear that digital literacy, critical thinking, adaptability, and communication skills are non-negotiable. Even in traditional blue-collar roles, technology-driven tools and processes are central.

Emerging Employment Needs

Analysis of concentrated and emerging industries highlights areas where Oklahoma is uniquely positioned:

- **Energy Infrastructure & Transition:** Oklahoma maintains some of the highest employment location quotients in oil and gas extraction, pipeline transportation, and mining support. Employers in these industries need workers with certifications in drilling operations, pipeline safety, and environmental compliance. At the same time, the state is preparing for diversification into renewable energy, creating new demand for skills in wind and solar installation, grid modernization, and battery storage.
- **Agriculture & Animal Production:** Hog and pig farming remains a specialized concentration, requiring expertise in livestock care, veterinary sciences, and precision agriculture technologies.
- **Gaming and Hospitality:** With concentrated occupations such as gambling surveillance officers and cage workers, employers require specialized knowledge of regulatory compliance, surveillance technologies, and financial transactions.
- **Public Safety & Forestry:** Forest fire inspectors illustrate the niche but growing need for specialized safety, emergency response, and environmental monitoring expertise.

Knowledge, Skills, and Abilities Employers Require

Oklahoma employers consistently highlight the following:

- **Technical Skills:** Industry-specific certifications (e.g., NCCER, CDL, health care licensure, welding, IT networking, cybersecurity).
- **Foundational Skills:** Literacy, numeracy, problem solving, and digital fluency.
- **Employability Skills:** Reliability, adaptability, teamwork, and customer service.
- **Specialized Abilities:** Safety compliance, precision technology use, environmental and regulatory knowledge.

Employers increasingly emphasize stackable, portable credentials that allow workers to build career pathways across industries.

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions. Provide key analytical conclusions in aggregate as well as disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)-(iii) below. Populations analyzed must include individuals with barriers to employment described in the first paragraph of Section II. Analysis must include—

I. EMPLOYMENT AND UNEMPLOYMENT

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

II. LABOR MARKET TRENDS

Provide an analysis of key labor market trends, including across existing industries and occupations.

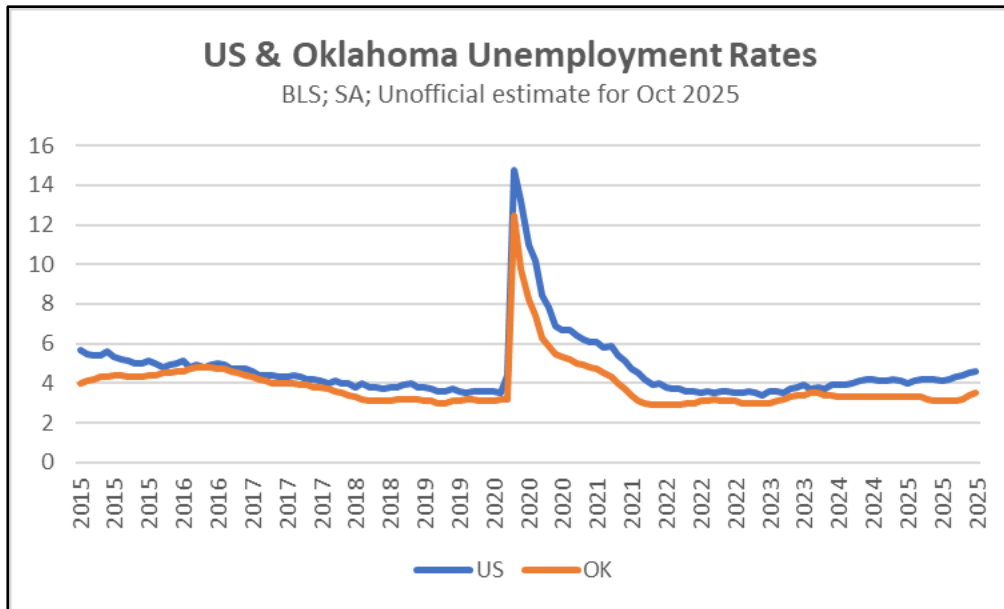
III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

Provide an analysis of the educational and skill levels of the workforce.

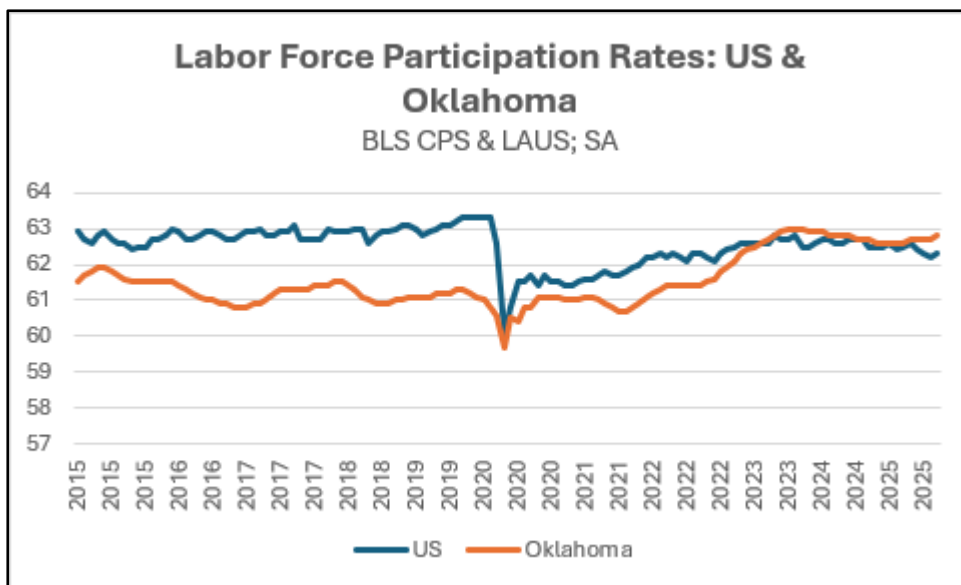
Employment and Unemployment

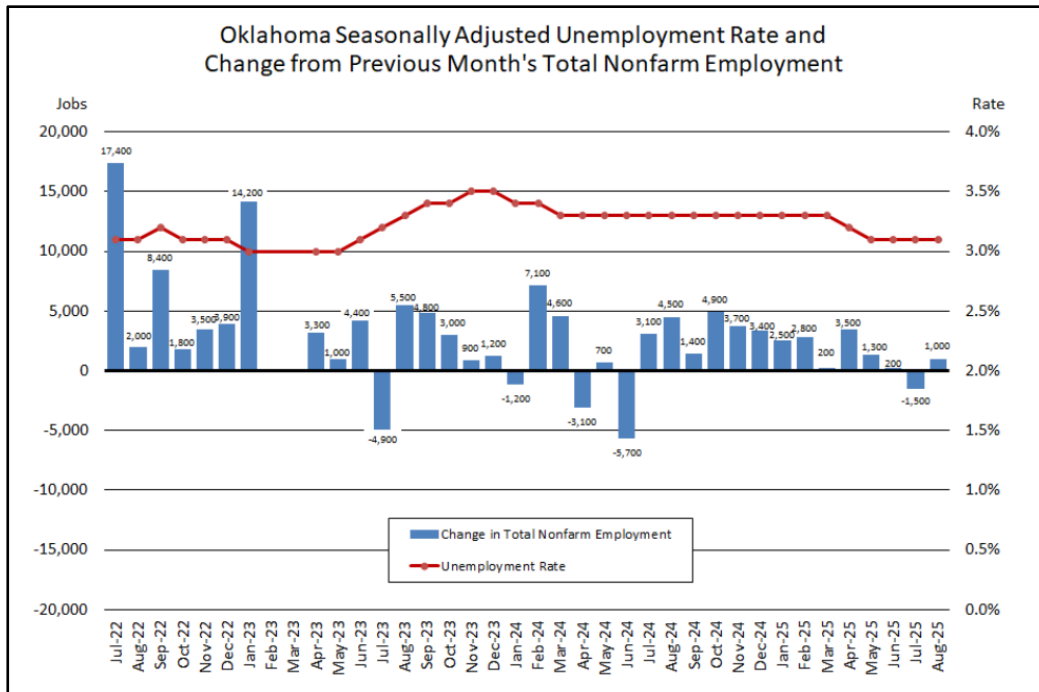
At the time of this writing there are many indicators that suggest a slowing in strength of our labor markets:

1. The statewide unemployment rate (seasonally adjusted) has jumped three-tenths over the last two months including a nearly 9% increase in the number of unemployed. While our state rate is still well below the national rate the recent swift jump does warrant reasonable concern.
2. Employment as measured in the household and establishment surveys is at historic highs but the growth rate of each is falling. Additionally, preliminary benchmark estimates suggest that some of the gains in the establishment survey will be revised away in a few months when BLS QCEW data is published.
3. The number of people being hired has seen a sharp decline over the past year and a half and is now reaching levels not seen in more than a decade.
4. Oklahoma still has more than 100,000 job openings, approximately 30,000 more openings than the number of unemployed in the state.
5. While the rate of job growth has been in decline for the 2nd half of 2025, private sector jobs continue to grow at a faster rate than government jobs. It is likely that the pace of job cuts within the federal government during CY 2025 will slow somewhat thus providing for more favorable year-over-year comparisons as 2026 progresses.



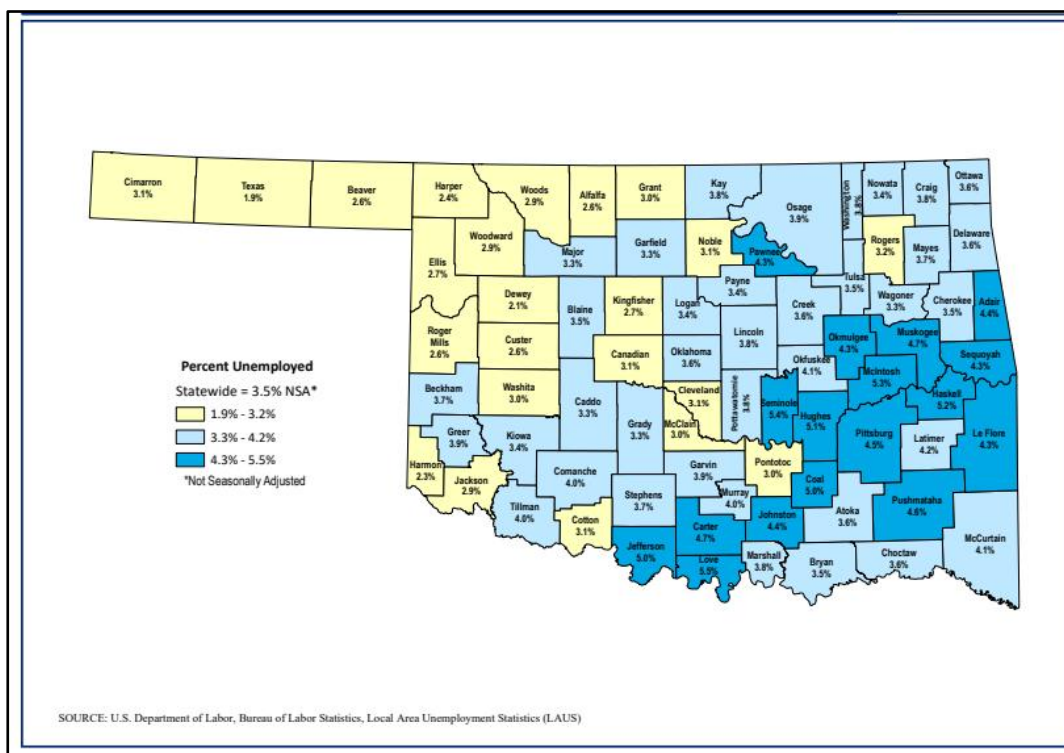
The increases in unemployment and labor force participation rates are best illustrated in graphical form.

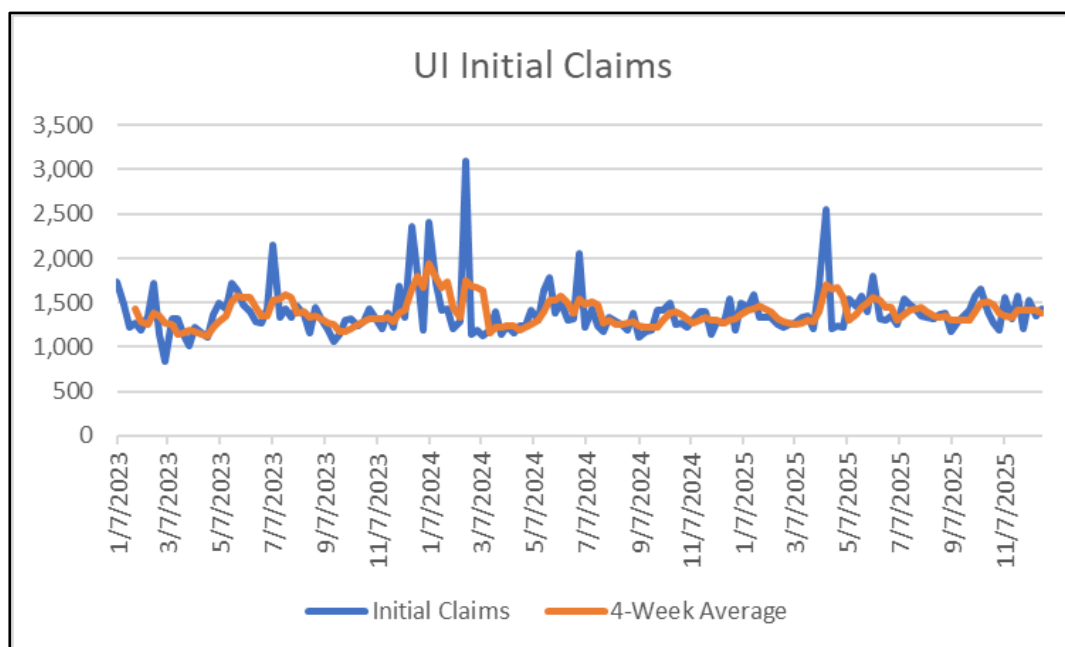
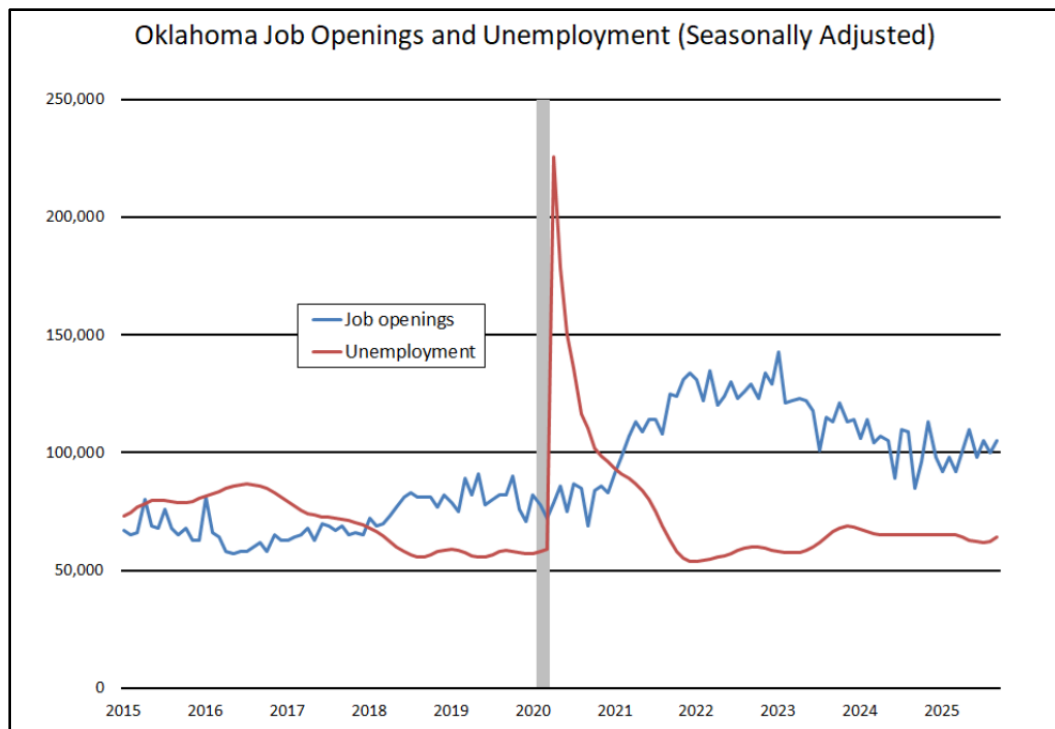


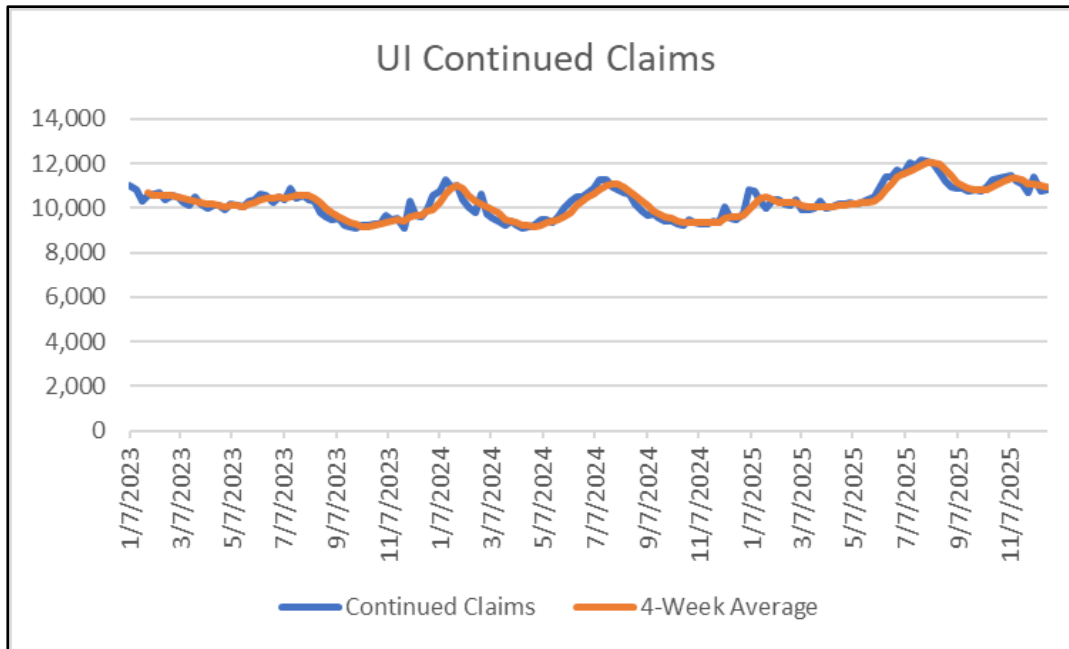


Unemployment Rates by County:

Oklahoma's unemployment rates continue to hover mostly below 4.0%.







Veterans - In 2024, the employment situation for veterans in Oklahoma differed somewhat from that for veterans nationwide. Our unemployment rate for veterans was lower (1.8% vs 3.0%), and our labor force participation rate was higher (50.3% vs 46.6%). There are an estimated 133,000 Oklahoma veterans in our state labor force.

Low Income - The labor force participation rate for individuals between 20 to 64 years is 74.9% in Oklahoma (2024 ACS 1 Year Estimates, Table ID S2301). For those at or above the poverty level, the labor force participation rate is 81.6%. The labor force participation rate is much lower for individuals below the poverty level at 47.1%. Additionally, the 2024 unemployment rate for individuals below the poverty level was 19.0%, and the population at or above the poverty level was significantly lower at 3.0%. Together, the unemployment rate for 20–64-year-olds was 4.4% in 2024.

Individuals with Disabilities - The civilian noninstitutionalized population (18-64 years old) in Oklahoma is approximately 2.4 million. Approximately 370,061 out of the 2.4 million are individuals with disabilities (2024 ACS 1-Year Estimates, Table ID B18120). The labor force includes both employed and unemployed individuals, and 52.3% of individuals with disabilities are in the labor force. 47.6% were employed, and 4.7% were unemployed.

Out of the employed individuals, 46,295 were individuals with hearing difficulty, 44,820 were individuals with a vision difficulty, 69,164 were individuals with a cognitive difficulty, 46,571 were individuals with an ambulatory difficulty, 8,220 were individuals with self-care difficulty, and 31,454 were individuals with independent living difficulty. Out of the unemployed individuals, 2,301 were individuals with hearing difficulty, 3,249 were individuals with vision difficulty, 10,055 were individuals with cognitive difficulty, 5,498 were individuals with ambulatory difficulty, 1,426 were individuals with self-care difficulty, 6,407 were individuals with independent living difficulty.

Race and Ethnicity - The labor force participation rates and unemployment rates for race and ethnicity in 2024 for Oklahoma are provided in the table below (2024 ACS 1 Year Estimates, Table ID S2301, 16 years and older).

RACE AND HISPANIC OR LATINO ORIGIN <i>Hispanic ethnicity with any race had a labor force participation rate of 70.5% and an unemployment rate of 5.8%.</i>	2024 OK Labor Force Participation Rate	2024 OK Unemployment Rate
White alone	60.1%	4.1%
Black or African American alone	60.8%	6.7%
American Indian and Alaska Native alone	60.1%	6.3%
Asian alone	69.4%	3.6%
Native Hawaiian and Other Pacific Islander alone	N/A	N/A
Some other race alone	70.5%	5.3%
Two or more races	65.5%	5.9%
Hispanic or Latino origin (of any race)	70.5%	5.8%
White alone, not Hispanic or Latino	59.6%	3.9%

The highest labor force participation rate based on race (people of any race may be of any ethnic origin) was some other race alone at 70.5%. Conversely, White alone had the lowest labor force participation rate at 60.1%. Black or African American alone had the highest unemployment rate at 6.7% while Asian alone had the lowest unemployment rate at 3.6% in Oklahoma.

Labor Market Trends

Here is a look at the long-term occupational outlook for employment for occupations in Oklahoma by where employment stood in 2022 versus what it is projected to be by 2032. These data products are produced every other year in accordance with national standards. They provide labor market participants with an informed guide of how current trends may play out over the next decade. When coupled with the employment concentration data presented above, they give a comprehensive picture of our key industries and occupations.

Oklahoma Long-Term Occupational Outlook, 2022-2032						
Occupation Title	SOC Code	2022	2032	Numeric	Percent	Average Annual Openings
Total, All Occupations	00-0000	1,826,010	1,914,270	88,270	4.8	213,330
Management Occupations	11-0000	124,380	132,480	8,100	6.5	10,790
Top Executives	11-1000	49,800	52,570	2,770	5.6	4,230
Chief Executives	11-1011	5,050	4,710	-340	-6.7	290
General and Operations Managers	11-1021	44,230	47,300	3,070	6.9	3,910
Legislators	11-1031	520	560	40	8.1	40
Advertising, Marketing, Promotions, Public Relations, and Sales Managers	11-2000	5,290	5,540	260	4.9	430
Advertising and Promotions Managers	11-2011	220	230	10	2.7	20
Marketing Managers	11-2021	1,500	1,600	110	7.0	130
Sales Managers	11-2022	2,910	3,020	110	3.8	230
Public Relations Managers	11-2032	380	400	20	5.9	30
Fundraising Managers	11-2033	290	300	10	4.6	20
Operations Specialties Managers	11-3000	20,280	22,290	2,010	9.9	1,700
Administrative Services Managers	11-3012	5,130	5,440	310	6.1	440

Facilities Managers	11-3013	690	740	50	7.1	60
Computer and Information Systems Managers	11-3021	3,440	3,900	460	13.2	280
Financial Managers	11-3031	5,640	6,540	900	16.0	500
Industrial Production Managers	11-3051	1,490	1,530	50	3.2	110
Purchasing Managers	11-3061	400	420	20	3.8	30
Transportation, Storage, and Distribution Managers	11-3071	1,590	1,720	130	7.8	140
Compensation and Benefits Managers	11-3111	130	130	0	1.6	10
Human Resources Managers	11-3121	1,520	1,610	80	5.5	120
Training and Development Managers	11-3131	240	260	20	8.0	20
Other Management Occupations	11-9000	49,020	52,080	3,060	6.3	4,430
Farmers, Ranchers, and Other Agricultural Managers	11-9013	13,270	12,780	-490	-3.7	1,300
Construction Managers	11-9021	3,820	4,170	360	9.3	320
Education and Childcare Administrators, Preschool and Daycare	11-9031	930	930	10	0.7	60
Education Administrators, Kindergarten through Secondary	11-9032	3,560	3,760	210	5.8	260
Education Administrators, Postsecondary	11-9033	2,540	2,530	-10	-0.4	170
Education Administrators, All Other	11-9039	380	390	10	2.9	30
Architectural and Engineering Managers	11-9041	1,910	2,010	100	5.1	130
Food Service Managers	11-9051	3,310	3,520	210	6.3	400
Gambling Managers	11-9071	300	300	0	0.7	30
Entertainment And Recreation Managers, Except Gambling	11-9072	80	90	10	11.4	10
Lodging Managers	11-9081	390	470	80	21.0	50
Medical and Health Services Managers	11-9111	7,420	9,360	1,950	26.3	780
Natural Sciences Managers	11-9121	260	270	0	1.2	20
Postmasters and Mail Superintendents	11-9131	220	220	0	-1.8	20
Property, Real Estate, and Community Association Managers	11-9141	3,530	3,770	240	6.8	300
Social and Community Service Managers	11-9151	1,790	1,980	190	10.3	160
Emergency Management Directors	11-9161	310	330	30	9.5	20
Funeral Home Managers	11-9171	630	640	10	1.6	50
Personal Service Managers, All Other	11-9179	170	180	10	7.1	10
Managers, All Other	11-9199	4,220	4,380	160	3.9	330
Business and Financial Operations Occupations	13-0000	103,830	110,690	6,860	6.6	9,110
Business Operations Specialists	13-1000	69,420	73,830	4,410	6.4	6,220
Buyers and Purchasing Agents	13-1020	5,200	4,890	-310	-5.9	420
Claims Adjusters, Examiners, and Investigators	13-1031	3,640	3,430	-200	-5.6	220
Compliance Officers	13-1041	5,890	6,200	310	5.2	490
Cost Estimators	13-1051	2,270	2,290	20	1.1	190

Human Resources Specialists	13-1071	9,140	9,820	680	7.4	840
Labor Relations Specialists	13-1075	1,220	1,220	0	-0.3	100
Logisticians	13-1081	3,880	4,570	690	17.7	400
Project Management Specialists	13-1082	8,520	9,170	660	7.7	680
Management Analysts	13-1111	5,430	6,110	680	12.6	530
Meeting, Convention, and Event Planners	13-1121	1,950	2,100	150	7.7	220
Fundraisers	13-1131	1,630	1,710	80	5.0	130
Compensation, Benefits, and Job Analysis Specialists	13-1141	1,150	1,260	110	9.1	90
Training and Development Specialists	13-1151	4,450	4,790	340	7.7	420
Market Research Analysts and Marketing Specialists	13-1161	7,640	8,710	1,070	14.0	840
Business Operations Specialists, All Other	13-1199	7,260	7,390	130	1.8	640
Financial Specialists	13-2000	34,410	36,870	2,450	7.1	2,880
Accountants and Auditors	13-2011	18,430	19,810	1,390	7.5	1,600
Property Appraisers and Assessors	13-2020	1,310	1,420	110	8.4	120
Budget Analysts	13-2031	550	560	10	2.6	40
Credit Analysts	13-2041	910	910	0	-0.4	60
Financial and Investment Analysts	13-2051	1,560	1,690	130	8.4	120
Personal Financial Advisors	13-2052	2,120	2,410	290	13.5	170
Insurance Underwriters	13-2053	970	950	-20	-2.2	60
Financial Risk Specialists	13-2054	270	290	30	9.4	20
Financial Examiners	13-2061	320	380	60	18.9	30
Credit Counselors	13-2071	190	200	10	2.6	10
Loan Officers	13-2072	5,370	5,700	320	6.0	400
Tax Examiners and Collectors, and Revenue Agents	13-2081	340	360	20	5.3	30
Tax Preparers	13-2082	1,580	1,680	100	6.3	190
Financial Specialists, All Other	13-2099	500	520	20	3.8	40
Computer and Mathematical Occupations	15-0000	38,510	42,830	4,320	11.2	2,840
Computer Occupations	15-1200	35,780	39,280	3,500	9.8	2,570
Computer Systems Analysts	15-1211	3,580	3,870	290	8.2	250
Information Security Analysts	15-1212	1,010	1,300	290	28.9	100
Computer and Information Research Scientists	15-1221	470	540	70	15.4	40
Computer Network Support Specialists	15-1231	2,340	2,430	90	3.7	170
Computer User Support Specialists	15-1232	8,000	8,210	210	2.7	550
Computer Network Architects	15-1241	1,790	1,840	50	2.7	100
Database Administrators	15-1242	1,250	1,320	70	5.2	80
Database Architects	15-1243	500	540	40	8.3	30
Network and Computer Systems Administrators	15-1244	2,870	2,920	60	2.0	170
Computer Programmers	15-1251	950	820	-130	-13.3	40
Software Developers	15-1252	7,930	9,680	1,760	22.1	640
Software Quality Assurance Analysts and Testers	15-1253	1,000	1,170	170	17.4	80
Web Developers	15-1254	590	670	80	13.5	50
Web and Digital Interface Designers	15-1255	790	890	110	13.4	70
Computer Occupations, All Other	15-1299	2,730	3,080	350	12.8	210

Mathematical Science Occupations	15-2000	2,740	3,550	810	29.7	270
Operations Research Analysts	15-2031	460	570	110	23.6	40
Statisticians	15-2041	150	190	40	27.0	10
Data Scientists	15-2051	2,060	2,710	650	31.8	210
Architecture and Engineering Occupations	17-0000	27,110	28,730	1,630	6.0	2,040
Architects, Surveyors, and Cartographers	17-1000	2,260	2,410	150	6.6	160
Architects, Except Landscape and Naval	17-1011	1,050	1,110	70	6.5	70
Surveyors	17-1022	1,040	1,110	70	7.0	70
Engineers	17-2000	16,690	18,000	1,320	7.9	1,090
Aerospace Engineers	17-2011	1,450	1,540	90	6.0	90
Chemical Engineers	17-2041	330	370	40	10.5	20
Civil Engineers	17-2051	2,710	2,960	250	9.1	190
Computer Hardware Engineers	17-2061	150	160	0	2.6	10
Electrical Engineers	17-2071	1,870	1,970	100	5.5	110
Electronics Engineers, Except Computer	17-2072	1,510	1,570	60	4.1	90
Environmental Engineers	17-2081	540	580	40	7.0	40
Health and Safety Engineers, Except Mining Safety Engineers and Inspectors	17-2111	640	680	40	6.9	40
Industrial Engineers	17-2112	2,200	2,470	270	12.3	160
Materials Engineers	17-2131	270	280	20	6.0	20
Mechanical Engineers	17-2141	2,040	2,250	210	10.1	140
Petroleum Engineers	17-2171	1,450	1,600	150	10.0	100
Engineers, All Other	17-2199	1,150	1,180	40	3.1	70
Drafters, Engineering Technicians, and Mapping Technicians	17-3000	8,160	8,330	160	2.0	790
Architectural and Civil Drafters	17-3011	1,540	1,560	20	1.4	150
Electrical and Electronics Drafters	17-3012	290	300	10	3.1	30
Mechanical Drafters	17-3013	740	690	-50	-6.7	50
Aerospace Engineering and Operations Technologists and Technicians	17-3021	210	230	10	6.1	20
Civil Engineering Technologists and Technicians	17-3022	450	470	20	3.8	40
Electrical and Electronics Engineering Technologists and Technicians	17-3023	1,210	1,250	40	3.3	120
Electro-Mechanical and Mechatronics Technologists and Technicians	17-3024	200	210	10	3.0	20
Environmental Engineering Technologists and Technicians	17-3025	410	410	0	0.3	40
Industrial Engineering Technologists and Technicians	17-3026	810	830	20	2.1	80
Mechanical Engineering Technologists and Technicians	17-3027	230	220	-10	-2.6	20
Calibration Technologists and Technicians	17-3028	80	80	0	5.3	10
Engineering Technologists and Technicians, Except Drafters, All Other	17-3029	770	780	10	1.4	70
Surveying and Mapping Technicians	17-3031	1,200	1,280	80	6.7	150

Life, Physical, and Social Science Occupations	19-0000	12120	13020	900	7.45	1210
Life Scientists	19-1000	2020	2120	100	4.95	150
Soil and Plant Scientists	19-1013	250	260	10	3.6	20
Biological Scientists, All Other	19-1029	580	590	10	1.4	40
Conservation Scientists	19-1031	390	410	30	7.0	30
Epidemiologists	19-1041	160	190	30	17.6	10
Medical Scientists, Except Epidemiologists	19-1042	400	420	20	4.0	20
Physical Scientists	19-2000	1,960	2,100	150	7.4	160
Atmospheric and Space Scientists	19-2021	160	160	0	0.0	10
Chemists	19-2031	570	600	30	5.7	40
Environmental Scientists and Specialists, Including Health	19-2041	470	520	50	10.4	40
Geoscientists, Except Hydrologists and Geographers	19-2042	610	670	60	10.3	60
Physical Scientists, All Other	19-2099	80	80	0	2.5	10
Social Scientists and Related Workers	19-3000	2,730	2,910	190	6.9	210
Clinical and Counseling Psychologists	19-3033	410	470	60	13.8	30
School Psychologists	19-3034	520	550	30	6.2	40
Psychologists, All Other	19-3039	390	410	20	6.0	30
Urban and Regional Planners	19-3051	830	870	40	5.1	70
Social Scientists and Related Workers, All Other	19-3099	180	180	0	0.0	10
Life, Physical, and Social Science Technicians	19-4000	3,650	3,820	170	4.7	460
Agricultural Technicians	19-4012	200	210	10	2.5	30
Food Science Technicians	19-4013	270	270	10	3.0	40
Biological Technicians	19-4021	570	580	0	0.7	70
Chemical Technicians	19-4031	680	710	30	4.4	80
Environmental Science and Protection Technicians, Including Health	19-4042	300	330	40	12.5	40
Geological Technicians, Except Hydrologic Technicians	19-4043	420	440	20	4.7	50
Social Science Research Assistants	19-4061	110	120	10	6.1	20
Forest and Conservation Technicians	19-4071	140	140	0	1.4	20
Forensic Science Technicians	19-4092	200	220	30	13.3	30
Life, Physical, and Social Science Technicians, All Other	19-4099	720	750	30	4.5	90
Occupational Health and Safety Specialists and Technicians	19-5000	1,760	2,060	300	17.1	230
Occupational Health and Safety Specialists	19-5011	1,490	1,740	250	17.0	190
Occupational Health and Safety Technicians	19-5012	280	330	50	17.7	40
Community and Social Service Occupations	21-0000	31,230	34,220	2,990	9.6	2,930
Counselors, Social Workers, and Other Community and Social Service Specialists	21-1000	30,280	33,240	2,960	9.8	2,840
Educational, Guidance, and Career Counselors and Advisors	21-1012	4,570	4,860	290	6.4	360

Marriage and Family Therapists	21-1013	1,350	1,560	210	15.7	110
Rehabilitation Counselors	21-1015	1,780	1,850	70	3.8	150
Substance Abuse, Behavioral Disorder, and Mental Health Counselors	21-1018	5,830	6,980	1,150	19.7	640
Child, Family, and School Social Workers	21-1021	6,510	6,830	320	4.9	540
Healthcare Social Workers	21-1022	3,100	3,370	270	8.7	300
Mental Health and Substance Abuse Social Workers	21-1023	960	1,040	80	8.8	80
Social Workers, All Other	21-1029	430	450	20	4.7	40
Health Education Specialists	21-1091	1,250	1,360	110	9.0	140
Probation Officers and Correctional Treatment Specialists	21-1092	920	940	30	3.2	70
Social and Human Service Assistants	21-1093	2,500	2,750	260	10.2	290
Community Health Workers	21-1094	720	810	100	13.5	90
Religious Workers	21-2000	950	980	30	2.7	90
Clergy	21-2011	700	720	20	3.5	60
Directors, Religious Activities and Education	21-2021	130	130	0	0.8	10
Religious Workers, All Other	21-2099	130	130	0	0.8	20
Legal Occupations	23-0000	13,440	14,530	1,090	8.1	950
Lawyers, Judges, and Related Workers	23-1000	8,550	9,340	790	9.3	420
Lawyers	23-1011	7,470	8,240	770	10.3	380
Judicial Law Clerks	23-1012	60	60	0	1.7	0
Administrative Law Judges, Adjudicators, and Hearing Officers	23-1021	110	110	0	1.9	0
Judges, Magistrate Judges, and Magistrates	23-1023	900	920	20	2.7	40
Legal Support Workers	23-2000	4,900	5,200	300	6.1	530
Paralegals and Legal Assistants	23-2011	2,910	3,100	190	6.5	320
Title Examiners, Abstractors, and Searchers	23-2093	1,860	1,960	110	5.8	190
Legal Support Workers, All Other	23-2099	140	140	0	2.2	10
Educational Instruction and Library Occupations	25-0000	99,870	104,690	4,820	4.8	9,170
Postsecondary Teachers	25-1000	16,480	17,010	530	3.2	1,360
Business Teachers, Postsecondary	25-1011	950	970	20	2.2	80
Mathematical Science Teachers, Postsecondary	25-1022	580	580	0	-0.5	50
Engineering Teachers, Postsecondary	25-1032	250	260	10	5.7	20
Chemistry Teachers, Postsecondary	25-1052	310	300	-10	-2.0	20
Physics Teachers, Postsecondary	25-1054	90	90	0	-1.1	10
Area, Ethnic, and Cultural Studies Teachers, Postsecondary	25-1062	200	190	0	-2.0	10
Economics Teachers, Postsecondary	25-1063	80	80	0	-2.5	10
Political Science Teachers, Postsecondary	25-1065	150	150	0	-1.3	10

Psychology Teachers, Postsecondary	25-1066	460	460	0	-0.2	40
Sociology Teachers, Postsecondary	25-1067	140	130	0	-1.5	10
Health Specialties Teachers, Postsecondary	25-1071	2,870	3,240	370	13.1	270
Nursing Instructors and Teachers, Postsecondary	25-1072	750	870	120	15.8	80
Education Teachers, Postsecondary	25-1081	610	600	-10	-1.6	50
Art, Drama, and Music Teachers, Postsecondary	25-1121	1,240	1,220	-30	-2.0	90
Communications Teachers, Postsecondary	25-1122	310	310	0	-0.3	20
English Language and Literature Teachers, Postsecondary	25-1123	690	670	-20	-3.2	50
Foreign Language and Literature Teachers, Postsecondary	25-1124	100	100	0	-4.0	10
History Teachers, Postsecondary	25-1125	230	230	-10	-3.9	20
Philosophy and Religion Teachers, Postsecondary	25-1126	210	210	-10	-2.8	20
Recreation and Fitness Studies Teachers, Postsecondary	25-1193	340	330	-10	-1.5	30
Career/Technical Education Teachers, Postsecondary	25-1194	2,620	2,740	110	4.3	220
Postsecondary Teachers, All Other	25-1199	1,900	1,870	-30	-1.4	140
Preschool, Elementary, Middle, Secondary, and Special Education Teachers	25-2000	53,270	56,280	3,020	5.7	4,130
Preschool Teachers, Except Special Education	25-2011	6,000	6,390	390	6.6	690
Kindergarten Teachers, Except Special Education	25-2012	1,510	1,600	90	6.0	170
Elementary School Teachers, Except Special Education	25-2021	15,360	16,200	840	5.5	1,130
Middle School Teachers, Except Special and Career/Technical Education	25-2022	6,770	7,150	380	5.6	500
Career/Technical Education Teachers, Middle School	25-2023	40	40	0	5.4	0
Secondary School Teachers, Except Special and Career/Technical Education	25-2031	18,960	20,060	1,100	5.8	1,310
Career/Technical Education Teachers, Secondary School	25-2032	780	810	30	4.0	50
Special Education Teachers, Preschool	25-2051	70	70	0	4.4	0
Special Education Teachers, Kindergarten and Elementary School	25-2052	1,520	1,590	70	4.6	110
Special Education Teachers, Middle School	25-2057	500	520	20	4.6	40
Special Education Teachers, Secondary School	25-2058	1,760	1,840	80	4.8	130
Other Teachers and Instructors	25-3000	8,600	9,090	490	5.7	1,170
Adult Basic Education, Adult Secondary Education, and	25-3011	280	260	-30	-9.3	30

English as a Second Language Instructors						
Self-Enrichment Teachers	25-3021	2,410	2,550	130	5.6	310
Substitute Teachers, Short-Term	25-3031	3,740	4,040	310	8.2	490
Tutors	25-3041	1,360	1,420	60	4.5	240
Teachers and Instructors, All Other	25-3099	810	820	10	1.5	100
Librarians, Curators, and Archivists	25-4000	3,620	3,770	150	4.2	450
Archivists	25-4011	230	240	20	6.6	30
Curators	25-4012	170	190	20	12.1	20
Museum Technicians and Conservators	25-4013	270	300	30	12.6	40
Librarians and Media Collections Specialists	25-4022	1,860	1,970	110	5.9	190
Library Technicians	25-4031	1,090	1,060	-30	-2.3	180
Other Educational Instruction and Library Occupations	25-9000	17,910	18,540	630	3.5	2,050
Instructional Coordinators	25-9031	3,220	3,280	60	1.9	280
Teaching Assistants, Except Postsecondary	25-9045	12,340	12,900	560	4.6	1,520
Educational Instruction and Library Workers, All Other	25-9099	890	880	-10	-0.7	80
Arts, Design, Entertainment, Sports, and Media Occupations	27-0000	20,850	21,810	960	4.6	2,200
Art and Design Workers	27-1000	6,410	6,660	250	3.9	650
Art Directors	27-1011	270	290	20	6.9	30
Craft Artists	27-1012	380	410	30	6.5	40
Fine Artists, Including Painters, Sculptors, and Illustrators	27-1013	140	150	10	5.8	10
Special Effects Artists and Animators	27-1014	130	150	10	9.0	10
Commercial and Industrial Designers	27-1021	210	220	10	5.3	20
Floral Designers	27-1023	640	540	-100	-15.9	60
Graphic Designers	27-1024	1,980	2,070	100	5.0	170
Interior Designers	27-1025	590	640	50	9.2	60
Merchandise Displayers and Window Trimmers	27-1026	1,730	1,830	100	5.7	220
Entertainers and Performers, Sports and Related Workers	27-2000	5,100	5,510	410	8.1	690
Producers and Directors	27-2012	860	910	50	5.9	80
Athletes and Sports Competitors	27-2021	140	160	20	15.4	20
Coaches and Scouts	27-2022	2,990	3,230	240	8.1	410
Choreographers	27-2032	100	110	10	5.0	20
Music Directors and Composers	27-2041	170	180	10	4.1	20
Musicians and Singers	27-2042	310	330	20	6.2	40
Media and Communication Workers	27-3000	6,480	6,660	170	2.7	590
Broadcast Announcers and Radio Disc Jockeys	27-3011	220	200	-20	-6.9	20
News Analysts, Reporters, and Journalists	27-3023	480	460	-20	-3.8	50
Public Relations Specialists	27-3031	2,820	2,970	150	5.4	240
Editors	27-3041	670	610	-60	-9.4	60
Technical Writers	27-3042	890	940	50	5.6	80
Writers and Authors	27-3043	850	890	40	4.9	90

Interpreters and Translators	27-3091	540	560	30	4.7	60
Media and Communication Equipment Workers	27-4000	2,850	2,980	130	4.6	270
Audio and Video Technicians	27-4011	710	740	40	5.0	70
Broadcast Technicians	27-4012	320	310	-10	-1.6	30
Photographers	27-4021	1,230	1,300	70	5.7	120
Camera Operators, Television, Video, and Film	27-4031	130	130	0	0.0	10
Film and Video Editors	27-4032	270	310	30	12.1	30
Media and Communication Equipment Workers, All Other	27-4099	80	80	0	0.0	10
Healthcare Practitioners and Technical Occupations	29-0000	122,190	130,730	8,540	7.0	8,040
Health Diagnosing or Treating Practitioners	29-1000	72,150	77,540	5,390	7.5	4,110
Chiropractors	29-1011	640	680	50	7.1	30
Dentists, General	29-1021	1,490	1,510	20	1.3	40
Dentists, All Other Specialists	29-1029	90	90	0	0.0	0
Dietitians and Nutritionists	29-1031	940	1,000	60	6.8	70
Optometrists	29-1041	540	580	40	6.5	20
Pharmacists	29-1051	4,170	4,380	210	5.1	180
Physician Assistants	29-1071	1,650	2,020	380	22.8	130
Podiatrists	29-1081	30	30	0	0.0	0
Occupational Therapists	29-1122	1,020	1,120	100	9.8	70
Physical Therapists	29-1123	2,420	2,720	300	12.4	130
Radiation Therapists	29-1124	240	240	0	0.8	10
Recreational Therapists	29-1125	210	220	10	4.3	20
Respiratory Therapists	29-1126	2,360	2,630	270	11.6	150
Speech-Language Pathologists	29-1127	2,150	2,630	470	21.9	170
Exercise Physiologists	29-1128	460	500	50	10.3	30
Therapists, All Other	29-1129	440	500	60	13.0	30
Veterinarians	29-1131	1,170	1,380	210	18.1	60
Registered Nurses	29-1141	37,490	39,290	1,790	4.8	2,240
Nurse Anesthetists	29-1151	320	330	10	3.1	10
Nurse Practitioners	29-1171	3,030	4,200	1,160	38.3	280
Audiologists	29-1181	70	80	10	8.1	0
Anesthesiologists	29-1211	540	540	0	-0.6	10
Dermatologists	29-1213	300	300	10	2.7	10
Emergency Medicine Physicians	29-1214	170	170	0	2.4	10
Family Medicine Physicians	29-1215	1,720	1,750	30	1.8	50
General Internal Medicine Physicians	29-1216	940	950	10	1.1	30
Neurologists	29-1217	60	60	0	1.6	0
Obstetricians and Gynecologists	29-1218	150	150	0	-0.7	0
Pediatricians, General	29-1221	90	90	0	1.1	0
Physicians, Pathologists	29-1222	160	160	0	1.3	0
Psychiatrists	29-1223	160	170	10	5.5	10
Radiologists	29-1224	820	820	10	0.9	20
Physicians, All Other	29-1229	2,240	2,260	10	0.6	60
Surgeons, All Other	29-1249	570	540	-20	-4.2	10
Dental Hygienists	29-1292	2,550	2,680	130	5.0	180
Healthcare Diagnosing or Treating Practitioners, All Other	29-1299	180	190	10	2.8	10
Health Technologists and Technicians	29-2000	47,120	49,950	2,830	6.0	3,720
Clinical Laboratory Technologists and Technicians	29-2010	5,920	6,100	170	2.9	400

Cardiovascular Technologists and Technicians	29-2031	1,020	1,040	30	2.5	70
Diagnostic Medical Sonographers	29-2032	1,140	1,280	140	11.8	80
Nuclear Medicine Technologists	29-2033	240	240	-10	-2.1	10
Radiologic Technologists and Technicians	29-2034	4,060	4,140	80	2.0	220
Magnetic Resonance Imaging Technologists	29-2035	480	500	20	3.3	30
Emergency Medical Technicians	29-2042	2,540	2,720	180	7.0	200
Paramedics	29-2043	1,610	1,700	90	5.5	80
Dietetic Technicians	29-2051	200	210	10	4.4	20
Pharmacy Technicians	29-2052	5,300	5,780	480	9.0	540
Psychiatric Technicians	29-2053	1,310	1,420	110	8.3	120
Surgical Technologists	29-2055	2,310	2,390	80	3.4	150
Veterinary Technologists and Technicians	29-2056	960	1,150	190	19.4	110
Ophthalmic Medical Technicians	29-2057	1,160	1,280	120	9.9	140
Licensed Practical and Licensed Vocational Nurses	29-2061	13,590	14,450	860	6.3	1,150
Medical Records Specialists	29-2072	2,480	2,630	150	6.1	180
Opticians, Dispensing	29-2081	600	620	20	3.7	50
Health Technologists and Technicians, All Other	29-2099	1,900	1,990	90	4.9	140
Other Healthcare Practitioners and Technical Occupations	29-9000	2,930	3,240	320	10.8	220
Health Information Technologists and Medical Registrars	29-9021	1,620	1,870	250	15.4	130
Athletic Trainers	29-9091	330	370	40	12.2	30
Surgical Assistants	29-9093	580	590	20	2.8	40
Healthcare Practitioners and Technical Workers, All Other	29-9099	400	410	10	2.3	30
Healthcare Support Occupations	31-0000	63,540	71,520	7,990	12.6	10,390
Home Health and Personal Care Aides; and Nursing Assistants, Orderlies, and Psychiatric Aides	31-1100	38,500	44,040	5,530	14.4	6,510
Home Health and Personal Care Aides	31-1120	19,090	23,300	4,210	22.0	3,530
Nursing Assistants	31-1131	18,860	20,170	1,310	6.9	2,890
Occupational Therapy and Physical Therapist Assistants and Aides	31-2000	3,000	3,500	500	16.6	490
Occupational Therapy Assistants	31-2011	660	800	140	21.9	110
Occupational Therapy Aides	31-2012	40	40	0	-2.4	10
Physical Therapist Assistants	31-2021	1,700	2,050	350	20.4	290
Physical Therapist Aides	31-2022	600	610	10	1.2	80
Other Healthcare Support Occupations	31-9000	22,030	23,990	1,960	8.9	3,390
Dental Assistants	31-9091	4,780	4,970	180	3.8	690
Medical Assistants	31-9092	9,830	11,030	1,190	12.1	1,450
Medical Equipment Preparers	31-9093	770	800	30	3.5	110
Medical Transcriptionists	31-9094	590	590	0	-0.3	100
Pharmacy Aides	31-9095	1,190	1,210	10	1.1	210

Veterinary Assistants and Laboratory Animal Caretakers	31-9096	1,730	2,070	330	19.2	400
Phlebotomists	31-9097	2,050	2,170	110	5.5	280
Protective Service Occupations	33-0000	42,520	44,690	2,170	5.1	4,750
Supervisors of Protective Service Workers	33-1000	4,530	4,800	270	5.9	360
First-Line Supervisors of Correctional Officers	33-1011	560	560	0	0.7	50
First-Line Supervisors of Police and Detectives	33-1012	1,720	1,890	170	10.0	130
First-Line Supervisors of Firefighting and Prevention Workers	33-1021	1,060	1,170	110	10.6	80
First-line Supervisors of Security Workers	33-1091	1,030	1,000	-30	-3.2	90
First-Line Supervisors of Protective Service Workers, All Other	33-1099	160	180	10	8.0	20
Firefighting and Prevention Workers	33-2000	5,030	5,570	540	10.6	450
Firefighters	33-2011	4,810	5,310	510	10.6	430
Fire Inspectors and Investigators	33-2021	120	130	10	10.4	10
Forest Fire Inspectors and Prevention Specialists	33-2022	110	130	20	14.3	10
Law Enforcement Workers	33-3000	16,290	17,160	870	5.3	1,410
Correctional Officers and Jailers	33-3012	4,880	4,740	-140	-2.9	400
Detectives and Criminal Investigators	33-3021	1,070	1,110	40	3.9	80
Fish and Game Wardens	33-3031	200	190	-10	-5.9	20
Police and Sheriff's Patrol Officers	33-3051	10,040	11,030	980	9.8	900
Other Protective Service Workers	33-9000	16,660	17,160	500	3.0	2,530
Animal Control Workers	33-9011	320	360	40	10.8	40
Gambling Surveillance Officers and Gambling Investigators	33-9031	1,760	1,720	-40	-2.3	230
Security Guards	33-9032	11,880	12,210	330	2.8	1,630
Lifeguards, Ski Patrol, and Other Recreational Protective Service Workers	33-9092	1,060	1,180	120	11.8	340
Transportation Security Screeners	33-9093	260	260	0	-0.8	20
School Bus Monitors	33-9094	530	500	-30	-5.0	90
Protective Service Workers, All Other	33-9099	320	350	30	9.5	100
Food Preparation and Serving Related Occupations	35-0000	162,070	176,180	14,110	8.7	32,700
Supervisors of Food Preparation and Serving Workers	35-1000	16,300	18,310	2,010	12.4	2,710
Chefs and Head Cooks	35-1011	750	850	100	13.8	100
First-Line Supervisors of Food Preparation and Serving Workers	35-1012	15,550	17,460	1,910	12.3	2,600
Cooks and Food Preparation Workers	35-2000	54,800	60,140	5,340	9.7	9,360
Cooks, Fast Food	35-2011	14,550	13,570	-980	-6.7	2,010

Cooks, Institution and Cafeteria	35-2012	12,640	13,470	830	6.6	2,040
Cooks, Restaurant	35-2014	17,540	22,760	5,220	29.7	3,540
Cooks, Short Order	35-2015	2,100	2,140	50	2.1	320
Food Preparation Workers	35-2021	7,820	8,050	230	2.9	1,430
Food and Beverage Serving Workers	35-3000	77,310	82,870	5,560	7.2	17,640
Bartenders	35-3011	7,110	7,800	690	9.7	1,340
Fast Food and Counter Workers	35-3023	38,730	42,310	3,580	9.3	9,610
Waiters and Waitresses	35-3031	29,510	30,600	1,090	3.7	6,330
Food Servers, Nonrestaurant	35-3041	1,970	2,170	200	10.0	360
Other Food Preparation and Serving Related Workers	35-9000	13,660	14,860	1,200	8.8	3,000
Dining Room and Cafeteria Attendants and Bartender Helpers	35-9011	4,980	5,570	600	12.0	1,040
Dishwashers	35-9021	4,340	4,580	250	5.7	790
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	35-9031	4,260	4,600	350	8.1	1,150
Food Preparation and Serving Related Workers, All Other	35-9099	90	100	10	10.9	20
Building and Grounds Cleaning and Maintenance Occupations	37-0000	55,830	60,400	4,560	8.2	8,250
Supervisors of Building and Grounds Cleaning and Maintenance Workers	37-1000	4,630	5,020	390	8.5	560
First-Line Supervisors of Housekeeping and Janitorial Workers	37-1011	2,440	2,670	230	9.6	320
First-Line Supervisors of Landscaping, Lawn Service, and Groundskeeping Workers	37-1012	2,190	2,350	160	7.3	250
Building Cleaning and Pest Control Workers	37-2000	38,190	41,080	2,890	7.6	5,830
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	37-2011	23,730	25,160	1,430	6.0	3,540
Maids and Housekeeping Cleaners	37-2012	13,270	14,590	1,320	10.0	2,100
Building Cleaning Workers, All Other	37-2019	70	80	10	8.7	10
Pest Control Workers	37-2021	1,130	1,260	130	11.1	170
Grounds Maintenance Workers	37-3000	13,010	14,290	1,280	9.9	1,870
Landscaping and Groundskeeping Workers	37-3011	12,010	13,210	1,200	10.0	1,730
Tree Trimmers and Pruners	37-3013	810	880	70	8.7	110
Personal Care and Service Occupations	39-0000	42,880	46,070	3,190	7.4	7,940
Supervisors of Personal Care and Service Workers	39-1000	3,800	4,110	310	8.2	450
First-Line Supervisors of Gambling Services Workers	39-1013	1,140	1,160	30	2.6	130
First-line Supervisors of Entertainment and Recreation Workers, Except Gambling Services	39-1014	960	1,090	120	12.6	120
First-line Supervisors of Personal Service Workers	39-1022	1,700	1,860	160	9.5	210

Animal Care and Service Workers	39-2000	4,770	5,510	740	15.5	970
Animal Trainers	39-2011	520	610	90	17.2	90
Animal Caretakers	39-2021	4,240	4,890	650	15.3	890
Entertainment Attendants and Related Workers	39-3000	5,530	5,930	410	7.3	1,450
Gambling Dealers	39-3011	1,150	1,170	20	1.5	190
Gambling and Sports Book Writers and Runners	39-3012	180	180	0	-1.7	30
Gambling Service Workers, All Other	39-3019	320	320	0	1.3	50
Ushers, Lobby Attendants, and Ticket Takers	39-3031	1,030	1,090	60	5.4	310
Amusement and Recreation Attendants	39-3091	2,710	3,020	310	11.5	830
Locker Room, Coatroom, and Dressing Room Attendants	39-3093	110	120	20	14.0	30
Funeral Service Workers	39-4000	1,030	1,020	-10	-1.0	140
Embalmers	39-4011	80	80	0	-3.7	10
Funeral Attendants	39-4021	600	600	-10	-1.0	90
Morticians, Undertakers, and Funeral Arrangers	39-4031	350	350	0	-0.3	40
Personal Appearance Workers	39-5000	5,710	6,070	370	6.4	810
Barbers	39-5011	340	370	30	7.9	40
Hairdressers, Hairstylists, and Cosmetologists	39-5012	4,020	4,270	260	6.4	580
Skincare Specialists	39-5094	510	540	40	6.9	80
Baggage Porters, Bellhops, and Concierges	39-6000	750	830	90	11.5	130
Baggage Porters and Bellhops	39-6011	110	130	10	11.4	20
Concierges	39-6012	630	710	70	11.5	110
Tour and Travel Guides	39-7000	260	290	30	11.0	60
Tour and Travel Guides	39-7010	260	290	30	11.0	60
Other Personal Care and Service Workers	39-9000	21,030	22,300	1,260	6.0	3,920
Childcare Workers	39-9011	12,340	12,450	110	0.9	2,060
Exercise Trainers and Group Fitness Instructors	39-9031	3,400	3,980	580	17.1	730
Recreation Workers	39-9032	2,930	3,210	280	9.5	650
Residential Advisors	39-9041	1,730	1,880	150	8.5	330
Personal Care and Service Workers, All Other	39-9099	630	780	140	22.4	140
Sales and Related Occupations	41-0000	169,780	173,350	3,570	2.1	22,850
Supervisors of Sales Workers	41-1000	24,530	24,370	-160	-0.6	2,290
First-Line Supervisors of Retail Sales Workers	41-1011	19,230	19,070	-150	-0.8	1,860
First-Line Supervisors of Non-Retail Sales Workers	41-1012	5,300	5,300	0	-0.1	430
Retail Sales Workers	41-2000	93,240	94,490	1,250	1.3	15,540
Cashiers	41-2011	40,300	39,710	-600	-1.5	7,670
Gambling Change Persons and Booth Cashiers	41-2012	1,940	1,790	-140	-7.3	350
Counter and Rental Clerks	41-2021	3,240	3,370	120	3.8	390
Parts Salespersons	41-2022	3,590	3,680	90	2.5	430
Retail Salespersons	41-2031	44,170	45,950	1,780	4.0	6,700
Sales Representatives, Services	41-3000	22,450	23,830	1,380	6.2	2,160
Advertising Sales Agents	41-3011	900	830	-70	-8.0	80
Insurance Sales Agents	41-3021	7,330	7,920	590	8.0	660

Securities, Commodities, and Financial Services Sales Agents	41-3031	2,210	2,430	220	9.9	190
Travel Agents	41-3041	360	380	20	6.1	50
Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel	41-3091	11,640	12,270	620	5.4	1,180
Sales Representatives, Wholesale and Manufacturing	41-4000	17,180	17,850	670	3.9	1,610
Sales Representatives, Wholesale and Manufacturing, Technical and Scientific Products	41-4011	6,720	7,010	290	4.3	630
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	41-4012	10,460	10,830	380	3.6	970
Other Sales and Related Workers	41-9000	12,390	12,810	430	3.5	1,260
Demonstrators and Product Promoters	41-9011	760	780	20	3.0	140
Real Estate Brokers	41-9021	320	340	20	7.6	30
Real Estate Sales Agents	41-9022	8,900	9,410	510	5.7	810
Sales Engineers	41-9031	560	580	20	3.6	50
Telemarketers	41-9041	990	820	-170	-17.2	110
Office and Administrative Support Occupations	43-0000	244,940	235,080	-9,860	-4.0	26,080
Supervisors of Office and Administrative Support Workers	43-1000	21,070	20,400	-670	-3.2	1,910
First-Line Supervisors of Office and Administrative Support Workers	43-1011	21,070	20,400	-670	-3.2	1,910
Communications Equipment Operators	43-2000	640	480	-160	-25.2	40
Switchboard Operators, Including Answering Service	43-2011	560	420	-140	-25.8	30
Financial Clerks	43-3000	42,010	39,730	-2,280	-5.4	4,250
Bill and Account Collectors	43-3011	2,300	2,150	-150	-6.7	220
Billing and Posting Clerks	43-3021	4,870	4,820	-50	-1.0	490
Bookkeeping, Accounting, and Auditing Clerks	43-3031	23,440	22,620	-820	-3.5	2,590
Gambling Cage Workers	43-3041	1,360	1,270	-90	-6.4	120
Payroll and Timekeeping Clerks	43-3051	2,640	2,260	-380	-14.4	210
Procurement Clerks	43-3061	770	720	-50	-7.0	70
Tellers	43-3071	6,560	5,820	-740	-11.3	560
Financial Clerks, All Other	43-3099	70	70	0	1.5	10
Information and Record Clerks	43-4000	71,950	70,920	-1,030	-1.4	8,960
Brokerage Clerks	43-4011	40	30	0	-8.6	0
Court, Municipal, and License Clerks	43-4031	3,600	3,990	380	10.6	420
Credit Authorizers, Checkers, and Clerks	43-4041	180	180	0	-1.1	10
Customer Service Representatives	43-4051	35,670	34,820	-840	-2.4	4,650
Eligibility Interviewers, Government Programs	43-4061	580	600	30	4.3	50
File Clerks	43-4071	1,940	1,690	-260	-13.3	200
Hotel, Motel, and Resort Desk Clerks	43-4081	3,160	3,570	410	13.0	580

Interviewers, Except Eligibility and Loan	43-4111	2,000	1,790	-210	-10.7	210
Library Assistants, Clerical	43-4121	1,250	1,230	-20	-1.7	210
Loan Interviewers and Clerks	43-4131	4,080	4,180	110	2.6	350
New Accounts Clerks	43-4141	1,600	1,410	-180	-11.5	120
Order Clerks	43-4151	3,450	3,060	-390	-11.4	330
Human Resources Assistants, Except Payroll and Timekeeping	43-4161	640	620	-20	-3.1	70
Receptionists and Information Clerks	43-4171	11,200	11,050	-150	-1.3	1,460
Information and Record Clerks, All Other	43-4199	1,440	1,470	40	2.7	170
Material Recording, Scheduling, Dispatching, and Distributing Workers	43-5000	32,110	32,030	-80	-0.3	3,110
Cargo and Freight Agents	43-5011	440	480	40	8.6	50
Couriers and Messengers	43-5021	4,840	4,890	40	0.9	520
Public Safety Telecommunicators	43-5031	1,980	2,170	190	9.7	230
Dispatchers, Except Police, Fire, and Ambulance	43-5032	2,530	2,570	50	1.8	240
Meter Readers, Utilities	43-5041	530	500	-30	-5.6	40
Postal Service Clerks	43-5051	1,040	1,020	-20	-1.6	90
Postal Service Mail Carriers	43-5052	3,950	3,880	-70	-1.7	290
Postal Service Mail Sorters, Processors, and Processing Machine Operators	43-5053	780	730	-50	-6.7	60
Production, Planning, and Expediting Clerks	43-5061	5,860	6,140	280	4.8	640
Shipping, Receiving, and Inventory Clerks	43-5071	9,570	9,050	-520	-5.4	890
Weighers, Measurers, Checkers, and Samplers, Recordkeeping	43-5111	580	590	10	1.4	70
Secretaries and Administrative Assistants	43-6000	43,550	39,970	-3,580	-8.2	4,170
Executive Secretaries and Executive Administrative Assistants	43-6011	4,070	3,230	-840	-20.7	290
Legal Secretaries and Administrative Assistants	43-6012	1,770	1,430	-350	-19.5	150
Medical Secretaries and Administrative Assistants	43-6013	9,640	10,130	490	5.1	1,070
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	43-6014	28,060	25,180	-2,880	-10.3	2,660
Other Office and Administrative Support Workers	43-9000	33,630	31,560	-2,070	-6.2	3,630
Data Entry Keyers	43-9021	2,020	1,510	-500	-24.9	150
Desktop Publishers	43-9031	170	140	-30	-18.8	10
Insurance Claims and Policy Processing Clerks	43-9041	1,610	1,550	-60	-3.9	140
Mail Clerks and Mail Machine Operators, Except Postal Service	43-9051	710	700	-10	-1.0	90
Office Clerks, General	43-9061	27,710	26,460	-1,250	-4.5	3,100
Office Machine Operators, Except Computer	43-9071	440	390	-60	-12.7	50

Proofreaders and Copy Markers	43-9081	90	70	-10	-14.1	10
Statistical Assistants	43-9111	80	70	-10	-6.7	10
Office and Administrative Support Workers, All Other	43-9199	560	490	-60	-11.2	50
Farming, Fishing, and Forestry Occupations	45-0000	14,640	14,500	-140	-1.0	2,120
Supervisors of Farming, Fishing, and Forestry Workers	45-1000	900	930	30	3.0	120
First-Line Supervisors of Farming, Fishing, and Forestry Workers	45-1011	900	930	30	3.0	120
Agricultural Workers	45-2000	13,230	13,070	-160	-1.2	1,930
Agricultural Inspectors	45-2011	740	760	20	2.8	120
Animal Breeders	45-2021	230	240	10	4.0	40
Graders and Sorters, Agricultural Products	45-2041	360	340	-20	-5.6	50
Agricultural Equipment Operators	45-2091	1,020	1,090	80	7.5	160
Farmworkers and Laborers, Crop, Nursery, and Greenhouse	45-2092	6,320	6,180	-140	-2.2	910
Farmworkers, Farm, Ranch, and Aquacultural Animals	45-2093	4,320	4,200	-110	-2.6	620
Agricultural Workers, All Other	45-2099	260	260	0	1.2	40
Forest, Conservation, and Logging Workers	45-4000	510	510	-10	-1.4	70
Logging Equipment Operators	45-4022	370	370	0	-0.3	50
Construction and Extraction Occupations	47-0000	93,040	99,080	6,040	6.5	8,940
Supervisors of Construction and Extraction Workers	47-1000	10,690	11,480	790	7.4	950
First-Line Supervisors of Construction Trades and Extraction Workers	47-1011	10,690	11,480	790	7.4	950
Construction Trades Workers	47-2000	60,800	64,450	3,650	6.0	5,590
Brickmasons and Blockmasons	47-2021	560	580	20	3.1	50
Stonemasons	47-2022	80	70	0	-4.0	10
Carpenters	47-2031	6,730	7,180	450	6.8	610
Carpet Installers	47-2041	300	290	-20	-5.9	20
Tile and Stone Setters	47-2044	410	450	40	9.2	40
Cement Masons and Concrete Finishers	47-2051	2,740	2,740	10	0.2	200
Construction Laborers	47-2061	15,480	16,670	1,200	7.7	1,490
Paving, Surfacing, and Tamping Equipment Operators	47-2071	800	820	20	2.4	70
Operating Engineers and Other Construction Equipment Operators	47-2073	6,770	7,170	400	5.9	620
Drywall and Ceiling Tile Installers	47-2081	500	520	20	4.6	40
Electricians	47-2111	8,780	9,570	790	9.0	880
Glaziers	47-2121	400	430	20	5.5	40
Insulation Workers, Floor, Ceiling, and Wall	47-2131	670	700	30	3.7	50
Insulation Workers, Mechanical	47-2132	200	210	10	4.4	20
Painters, Construction and Maintenance	47-2141	3,120	3,220	110	3.4	250
Paperhangers	47-2142	130	130	10	3.9	10
Pipelayers	47-2151	730	750	20	2.1	60

Plumbers, Pipefitters, and Steamfitters	47-2152	6,370	6,700	330	5.2	590
Roofers	47-2181	1,230	1,290	60	5.1	100
Sheet Metal Workers	47-2211	3,100	3,110	20	0.6	280
Structural Iron and Steel Workers	47-2221	1,240	1,330	90	7.4	120
Helpers, Construction Trades	47-3000	3,430	3,470	30	1.0	380
Helpers--Brickmasons, Blockmasons, Stonemasons, and Tile and Marble Setters	47-3011	120	110	-10	-10.2	10
Helpers--Electricians	47-3013	1,600	1,570	-30	-2.0	170
Helpers--Pipelayers, Plumbers, Pipefitters, and Steamfitters	47-3015	1,310	1,370	70	5.0	150
Other Construction and Related Workers	47-4000	7,460	8,170	710	9.6	800
Construction and Building Inspectors	47-4011	1,710	1,770	60	3.5	200
Elevator and Escalator Installers and Repairers	47-4021	250	250	10	2.8	20
Fence Erectors	47-4031	300	310	10	2.7	30
Hazardous Materials Removal Workers	47-4041	290	280	-10	-3.5	30
Highway Maintenance Workers	47-4051	3,630	4,210	580	15.9	410
Rail-Track Laying and Maintenance Equipment Operators	47-4061	400	400	0	0.3	30
Septic Tank Servicers and Sewer Pipe Cleaners	47-4071	800	870	70	8.8	80
Miscellaneous Construction and Related Workers	47-4090	80	80	0	1.3	10
Extraction Workers	47-5000	10,650	11,510	860	8.0	1,210
Derrick Operators, Oil and Gas	47-5011	500	540	40	7.2	60
Rotary Drill Operators, Oil and Gas	47-5012	1,930	2,090	160	8.1	220
Service Unit Operators, Oil and Gas	47-5013	2,960	3,200	230	7.9	340
Excavating and Loading Machine and Dragline Operators, Surface Mining	47-5022	240	240	0	1.3	20
Earth Drillers, Except Oil and Gas	47-5023	50	60	10	10.0	10
Explosives Workers, Ordnance Handling Experts, and Blasters	47-5032	440	440	0	-0.7	40
Rock Splitters, Quarry	47-5051	160	180	20	11.7	20
Roustabouts, Oil and Gas	47-5071	3,610	3,970	360	10.1	420
Helpers--Extraction Workers	47-5081	440	490	50	10.9	60
Extraction Workers, All Other	47-5099	60	70	10	10.9	10
Installation, Maintenance, and Repair Occupations	49-0000	89,090	94,600	5,510	6.2	8,460
Supervisors of Installation, Maintenance, and Repair Workers	49-1000	7,980	8,380	400	5.0	710
First-Line Supervisors of Mechanics, Installers, and Repairers	49-1011	7,980	8,380	400	5.0	710
Electrical and Electronic Equipment Mechanics, Installers, and Repairers	49-2000	6,110	6,380	260	4.3	610
Computer, Automated Teller, and Office Machine Repairers	49-2011	950	900	-50	-4.7	90

Radio, Cellular, and Tower Equipment Installers and Repairers	49-2021	220	230	20	7.4	20
Telecommunications Equipment Installers and Repairers, Except Line Installers	49-2022	1,680	1,840	160	9.4	190
Avionics Technicians	49-2091	510	520	10	2.0	50
Electric Motor, Power Tool, and Related Repairers	49-2092	250	270	20	7.2	20
Electrical and Electronics Repairers, Commercial and Industrial Equipment	49-2094	1,010	1,010	-10	-0.6	80
Electrical and Electronics Repairers, Powerhouse, Substation, and Relay	49-2095	380	400	20	5.0	40
Security and Fire Alarm Systems Installers	49-2098	830	930	100	12.0	100
Vehicle and Mobile Equipment Mechanics, Installers, and Repairers	49-3000	29,050	30,070	1,010	3.5	2,560
Aircraft Mechanics and Service Technicians	49-3011	6,340	6,540	200	3.1	480
Automotive Body and Related Repairers	49-3021	2,220	2,230	10	0.6	190
Automotive Glass Installers and Repairers	49-3022	100	100	0	1.0	10
Automotive Service Technicians and Mechanics	49-3023	10,090	10,360	270	2.7	890
Bus and Truck Mechanics and Diesel Engine Specialists	49-3031	3,960	4,100	140	3.6	350
Farm Equipment Mechanics and Service Technicians	49-3041	710	800	80	11.8	70
Mobile Heavy Equipment Mechanics, Except Engines	49-3042	2,650	2,840	190	7.3	240
Rail Car Repairers	49-3043	110	110	0	0.0	10
Motorboat Mechanics and Service Technicians	49-3051	230	250	20	8.2	30
Motorcycle Mechanics	49-3052	260	260	10	2.3	30
Outdoor Power Equipment and Other Small Engine Mechanics	49-3053	470	500	30	5.7	50
Bicycle Repairers	49-3091	90	100	10	11.5	10
Recreational Vehicle Service Technicians	49-3092	210	230	20	10.2	30
Tire Repairers and Changers	49-3093	1,640	1,670	30	2.0	190
Other Installation, Maintenance, and Repair Occupations	49-9000	45,940	49,780	3,840	8.4	4,580
Control and Valve Installers and Repairers, Except Mechanical Door	49-9012	1,330	1,410	80	5.6	110
Heating, Air Conditioning, and Refrigeration Mechanics and Installers	49-9021	5,990	6,450	460	7.7	560
Home Appliance Repairers	49-9031	430	440	10	2.6	40
Industrial Machinery Mechanics	49-9041	4,740	5,510	770	16.2	470
Maintenance Workers, Machinery	49-9043	3,580	3,880	300	8.4	380
Millwrights	49-9044	80	90	0	4.9	10

Electrical Power-Line Installers and Repairers	49-9051	2,180	2,350	170	7.8	190
Telecommunications Line Installers and Repairers	49-9052	1,550	1,690	130	8.6	160
Medical Equipment Repairers	49-9062	460	510	50	10.3	50
Musical Instrument Repairers and Tuners	49-9063	60	50	-10	-8.6	10
Precision Instrument and Equipment Repairers, All Other	49-9069	100	90	0	-3.2	10
Maintenance and Repair Workers, General	49-9071	19,700	21,050	1,340	6.8	1,960
Wind Turbine Service Technicians	49-9081	610	970	360	59.1	110
Coin, Vending, and Amusement Machine Servicers and Repairers	49-9091	1,540	1,560	20	1.1	170
Locksmiths and Safe Repairers	49-9094	100	100	-10	-7.7	10
Manufactured Building and Mobile Home Installers	49-9095	170	140	-30	-16.1	10
Riggers	49-9096	200	220	10	5.4	20
Signal and Track Switch Repairers	49-9097	130	140	0	2.3	10
Helpers--Installation, Maintenance, and Repair Workers	49-9098	1,130	1,180	50	4.3	130
Installation, Maintenance, and Repair Workers, All Other	49-9099	1,320	1,380	60	4.6	130
Production Occupations	51-0000	99,050	98,130	-920	-0.9	10,310
Supervisors of Production Workers	51-1000	8,870	9,090	230	2.6	850
First-Line Supervisors of Production and Operating Workers	51-1011	8,870	9,090	230	2.6	850
Assemblers and Fabricators	51-2000	16,230	15,430	-800	-4.9	1,600
Aircraft Structure, Surfaces, Rigging, and Systems Assemblers	51-2011	500	440	-70	-13.0	40
Coil Winders, Tapers, and Finishers	51-2021	190	160	-40	-18.3	20
Electrical, Electronic, and Electromechanical Assemblers, Except Coil Winders, Tapers, and Finishers	51-2028	2,040	2,120	90	4.3	230
Engine and Other Machine Assemblers	51-2031	290	250	-40	-13.7	30
Structural Metal Fabricators and Fitters	51-2041	690	570	-120	-17.4	50
Miscellaneous Assemblers and Fabricators	51-2090	12,340	11,710	-620	-5.0	1,210
Food Processing Workers	51-3000	8,930	9,310	380	4.3	1,220
Bakers	51-3011	1,980	2,140	170	8.4	320
Butchers and Meat Cutters	51-3021	1,410	1,450	40	2.9	170
Meat, Poultry, and Fish Cutters and Trimmers	51-3022	1,430	1,480	50	3.4	180
Slaughterers and Meat Packers	51-3023	1,900	1,900	0	0.2	220
Food Batchmakers	51-3092	910	980	70	7.9	150
Food Cooking Machine Operators and Tenders	51-3093	550	570	20	3.1	80
Metal Workers and Plastic Workers	51-4000	21,490	21,450	-50	-0.2	2,080

Extruding and Drawing Machine Setters, Operators, and Tenders, Metal and Plastic	51-4021	680	670	-10	-1.5	70
Rolling Machine Setters, Operators, and Tenders, Metal and Plastic	51-4023	140	130	-10	-5.1	10
Cutting, Punching, and Press Machine Setters, Operators, and Tenders, Metal and Plastic	51-4031	1,360	1,250	-110	-8.3	120
Drilling and Boring Machine Tool Setters, Operators, and Tenders, Metal and Plastic	51-4032	90	70	-20	-18.6	10
Grinding, Lapping, Polishing, and Buffing Machine Tool Setters, Operators, and Tenders, Metal and Plastic	51-4033	520	470	-50	-9.1	50
Lathe and Turning Machine Tool Setters, Operators, and Tenders, Metal and Plastic	51-4034	420	380	-40	-8.7	50
Milling and Planing Machine Setters, Operators, and Tenders, Metal and Plastic	51-4035	140	130	-20	-11.1	20
Machinists	51-4041	3,760	3,840	80	2.2	380
Metal-Refining Furnace Operators and Tenders	51-4051	110	110	0	-0.9	10
Foundry Mold and Coremakers	51-4071	130	100	-20	-18.4	10
Molding, Coremaking, and Casting Machine Setters, Operators, and Tenders, Metal and Plastic	51-4072	1,350	1,310	-40	-2.7	110
Multiple Machine Tool Setters, Operators, and Tenders, Metal and Plastic	51-4081	2,000	2,040	50	2.3	200
Tool and Die Makers	51-4111	220	210	-10	-3.2	20
Welders, Cutters, Solderers, and Brazers	51-4121	9,520	9,740	220	2.3	950
Welding, Soldering, and Brazing Machine Setters, Operators, and Tenders	51-4122	260	240	-10	-5.5	20
Heat Treating Equipment Setters, Operators, and Tenders, Metal and Plastic	51-4191	200	180	-10	-6.6	20
Plating Machine Setters, Operators, and Tenders, Metal and Plastic	51-4193	250	220	-30	-11.3	20
Metal Workers and Plastic Workers, All Other	51-4199	130	120	-10	-9.0	10
Printing Workers	51-5100	1,790	1,680	-110	-6.1	170
Prepress Technicians and Workers	51-5111	160	150	-10	-8.1	20
Printing Press Operators	51-5112	1,430	1,350	-70	-5.2	140
Print Binding and Finishing Workers	51-5113	200	180	-20	-10.8	20
Textile, Apparel, and Furnishings Workers	51-6000	4,820	4,620	-200	-4.2	580
Laundry and Dry-Cleaning Workers	51-6011	3,000	3,020	20	0.6	410
Pressers, Textile, Garment, and Related Materials	51-6021	250	190	-70	-25.7	20
Sewing Machine Operators	51-6031	960	840	-110	-11.9	90
Tailors, Dressmakers, and Custom Sewers	51-6052	130	110	-20	-12.0	10

Extruding and Forming Machine Setters, Operators, and Tenders, Synthetic and Glass Fibers	51-6091	110	110	0	1.8	10
Upholsterers	51-6093	140	140	0	0.7	10
Textile, Apparel, and Furnishings Workers, All Other	51-6099	100	90	-10	-11.3	10
Woodworkers	51-7000	1,960	2,010	50	2.5	210
Cabinetmakers and Bench Carpenters	51-7011	1,080	1,110	30	2.9	110
Furniture Finishers	51-7021	180	200	20	11.1	20
Sawing Machine Setters, Operators, and Tenders, Wood	51-7041	270	270	0	1.5	30
Woodworking Machine Setters, Operators, and Tenders, Except Sawing	51-7042	280	280	0	-0.4	30
Woodworkers, All Other	51-7099	150	140	-10	-3.4	20
Plant and System Operators	51-8000	6,100	6,120	20	0.4	560
Power Plant Operators	51-8013	270	250	-20	-6.3	20
Stationary Engineers and Boiler Operators	51-8021	270	270	0	-1.5	30
Water and Wastewater Treatment Plant and System Operators	51-8031	2,760	2,750	-10	-0.4	260
Gas Plant Operators	51-8092	500	490	-10	-2.8	40
Petroleum Pump System Operators, Refinery Operators, and Gaugers	51-8093	2,100	2,170	70	3.2	200
Plant and System Operators, All Other	51-8099	110	100	0	-1.0	10
Other Production Occupations	51-9000	28,860	28,420	-440	-1.5	3,040
Chemical Equipment Operators and Tenders	51-9011	1,000	950	-50	-4.7	90
Separating, Filtering, Clarifying, Precipitating, and Still Machine Setters, Operators, and Tenders	51-9012	620	620	0	-0.2	60
Crushing, Grinding, and Polishing Machine Setters, Operators, and Tenders	51-9021	600	600	0	0.3	60
Grinding and Polishing Workers, Hand	51-9022	340	280	-60	-16.9	30
Mixing and Blending Machine Setters, Operators, and Tenders	51-9023	1,140	1,190	50	3.9	120
Cutters and Trimmers, Hand	51-9031	140	110	-40	-26.1	10
Cutting and Slicing Machine Setters, Operators, and Tenders	51-9032	710	690	-20	-3.1	70
Extruding, Forming, Pressing, and Compacting Machine Setters, Operators, and Tenders	51-9041	610	620	10	1.3	60
Furnace, Kiln, Oven, Drier, and Kettle Operators and Tenders	51-9051	230	230	0	-0.4	30
Inspectors, Testers, Sorters, Samplers, and Weighers	51-9061	6,220	6,030	-200	-3.2	680
Jewelers and Precious Stone and Metal Workers	51-9071	150	150	0	-1.3	20
Dental Laboratory Technicians	51-9081	370	360	-10	-3.5	40
Medical Appliance Technicians	51-9082	50	50	0	2.0	10

Ophthalmic Laboratory Technicians	51-9083	320	330	10	3.8	40
Packaging and Filling Machine Operators and Tenders	51-9111	2,990	3,140	150	5.2	340
Painting, Coating, and Decorating Workers	51-9123	150	150	0	1.4	10
Coating, Painting, and Spraying Machine Setters, Operators, and Tenders	51-9124	2,190	2,230	30	1.6	200
Computer Numerically Controlled Tool Operators	51-9161	3,150	2,940	-210	-6.7	250
Computer Numerically Controlled Tool Programmers	51-9162	470	540	80	16.0	50
Adhesive Bonding Machine Operators and Tenders	51-9191	60	60	0	3.2	10
Cleaning, Washing, and Metal Pickling Equipment Operators and Tenders	51-9192	450	470	20	5.4	50
Molders, Shapers, and Casters, Except Metal and Plastic	51-9195	630	650	20	2.7	80
Paper Goods Machine Setters, Operators, and Tenders	51-9196	890	860	-30	-3.1	100
Helpers--Production Workers	51-9198	2,180	2,030	-150	-6.9	310
Production Workers, All Other	51-9199	1,160	1,170	10	0.4	120
Transportation and Material Moving Occupations	53-0000	155,090	166,940	11,850	7.6	21,240
Supervisors of Transportation and Material Moving Workers	53-1000	6,800	7,290	500	7.3	750
First Line Supervisors of Transportation & Material Moving Workers, Exc Aircraft Cargo Handling Supervisor	53-1047	6,790	7,280	500	7.3	750
Air Transportation Workers	53-2000	980	1,030	40	4.3	110
Airline Pilots, Copilots, and Flight Engineers	53-2011	230	230	0	1.8	30
Commercial Pilots	53-2012	410	440	30	6.3	50
Air Traffic Controllers	53-2021	270	270	0	1.5	20
Motor Vehicle Operators	53-3000	54,150	58,910	4,760	8.8	6,630
Ambulance Drivers and Attendants, Except Emergency Medical Technicians	53-3011	190	180	-10	-3.2	30
Driver/Sales Workers	53-3031	6,940	7,890	960	13.8	870
Heavy and Tractor-Trailer Truck Drivers	53-3032	28,050	30,090	2,040	7.3	3,220
Light Truck Drivers	53-3033	11,680	12,740	1,060	9.1	1,370
Bus Drivers, School	53-3051	3,850	4,040	190	4.9	620
Bus Drivers, Transit and Intercity	53-3052	1,020	1,150	130	12.7	150
Shuttle Drivers and Chauffeurs	53-3053	1,310	1,510	200	15.4	210
Taxi Drivers	53-3054	610	750	150	23.9	80
Motor Vehicle Operators, All Other	53-3099	500	550	50	8.9	80
Rail Transportation Workers	53-4000	1,100	1,100	0	0.3	90
Locomotive Engineers	53-4011	440	450	0	0.2	40
Other Transportation Workers	53-6000	2,260	2,300	50	2.1	310
Parking Attendants	53-6021	640	630	0	-0.6	90
Automotive and Watercraft Service Attendants	53-6031	950	980	30	3.2	140
Aircraft Service Attendants	53-6032	150	160	10	4.7	20
Transportation Inspectors	53-6051	370	380	10	2.1	40
Material Moving Workers	53-7000	89,750	96,240	6,490	7.2	13,350

Conveyor Operators and Tenders	53-7011	500	520	30	5.4	50
Crane and Tower Operators	53-7021	590	620	30	5.1	60
Industrial Truck and Tractor Operators	53-7051	11,230	11,650	420	3.7	1,140
Cleaners of Vehicles and Equipment	53-7061	4,650	4,850	200	4.3	640
Laborers and Freight, Stock, and Material Movers, Hand	53-7062	31,840	34,070	2,230	7.0	4,480
Machine Feeders and Offbearers	53-7063	120	130	0	2.4	20
Packers and Packagers, Hand	53-7064	2,870	2,980	100	3.6	430
Stockers and Order Fillers	53-7065	34,260	37,570	3,320	9.7	6,080
Pump Operators, Except Wellhead Pumps	53-7072	330	350	20	5.2	40
Wellhead Pumps	53-7073	650	710	60	9.0	70
Refuse and Recyclable Material Collectors	53-7081	2,330	2,410	80	3.2	300
Tank Car, Truck, and Ship Loaders	53-7121	280	280	10	2.2	30

Education and Skill Levels of the Workforce

Educational attainment employment data from the Current Population Survey includes the population aged 25 and above (2022 CPS via BLS). The 2022 Labor force participation rates increased based on level of educational attainment:

- less than high school graduate was 48.1%,
- high school graduate (including equivalency), no college was 55.4%,
- some college or associate's degree was 61.6%,
- and bachelor's degree or higher was 72.8%.

Similarly, the unemployment rates decreased based on level of educational attainment: less than high school graduate was 6.5%, high school graduate (including equivalency) was 4.0%, some college or associate's degree was 3.1%, and bachelor's degree or higher was 1.4%.

C. COMPARISON OF ECONOMIC AND WORKFORCE ANALYTICAL CONCLUSION. DESCRIBE AREAS OF OPPORTUNITY FOR MEETING HIRING, EDUCATION, AND SKILLS NEEDS IDENTIFIED IN THE ECONOMY COMPARED TO THE ASSETS AVAILABLE IN THE LABOR FORCE IN THE STATE.

Analysis of Oklahoma's economy and workforce identifies clear opportunities to better align hiring, education, and skill development efforts with employer demand. While Oklahoma's labor force includes individuals with a broad range of skills and experience, the analysis highlights persistent gaps between the skills required in high-demand and emerging industries and the credentials and training currently held by portions of the workforce. These gaps are most evident in sectors experiencing sustained growth, where employers report challenges filling positions requiring specialized technical skills, industry-recognized credentials, or work-based experience.

Oklahoma's workforce system is positioned to address these gaps by leveraging partnerships across workforce development, education, and economic development entities to align training strategies with documented employer needs. Workforce and economic development partners engage employers to identify hiring challenges, skill shortages, and workforce upskilling needs, which inform sector strategies, career pathway development, and training investments.

The State's workforce development activities emphasize connecting job seekers to employment opportunities that match their existing skills while expanding access to training that supports skill development and advancement. Outreach strategies, employer engagement activities, and regional planning efforts are informed by labor market data to ensure workforce services target industries and occupations where alignment between labor supply and demand can be strengthened.

These efforts support improved worker mobility by enabling individuals to obtain skills and credentials aligned with employer demand, while also supporting businesses in filling critical talent needs. Together, this approach advances a data-informed, employer-driven workforce system that aligns available labor force assets with the evolving needs of Oklahoma's economy.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required ⁶ and optional one-stop delivery system partners.⁷ [6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.

The State's Workforce Development Activities:

Since adoption of Oklahoma's prior Workforce Development State Plan, the State has undertaken significant actions to strengthen alignment, accountability, and effectiveness across its workforce development system. These actions build upon earlier efforts focused on credential attainment, industry alignment, and partnership development, while responding to identified limitations in system coordination and governance.

Historically, Oklahoma emphasized credential attainment as a primary strategy to address employer skill needs and workforce preparation. Workforce and economic development priorities were guided by five industry clusters: Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, Transportation and Distribution, and associated growth and demand occupations. While these efforts supported improved collaboration and infrastructure development, they did not consistently produce the level of systemwide coordination, accountability, or speed of outcomes needed to meet evolving workforce and economic demands.

In response, Governor Kevin Stitt convened the Workforce Transformation Task Force in spring 2023 to evaluate Oklahoma's workforce development system and identify strengths and challenges. In its report published April 15, 2023, the Task Force identified fragmentation across programs and governance structures, summarized by the observation that "everyone in state government does workforce development, but no one owns it." The Task Force recommended establishment of a centralized, results-oriented entity to coordinate workforce strategy and align workforce development with both economic growth and individual opportunity.

On August 10, 2023, Executive Order 2023-21 was filed with the Oklahoma Secretary of State, transferring responsibility and authority for administration of WIOA Title I programs to the Oklahoma Employment Security Commission (OESC). This action was taken to improve administrative efficiency, reduce duplication, strengthen coordination, and position Oklahoma to compete more effectively at the national and global levels. The Executive Order emphasized the need for a coordinated workforce system that connects job seekers to careers and enables employers to access skilled talent.

Building on the Task Force recommendations and Executive Order 2023-21, Oklahoma formally operationalized the Oklahoma Workforce Commission in February 2025 through the hiring of an Executive Director and establishment of organizational capacity to support statewide workforce coordination. In coordination with the Governor's Council for Workforce and Economic Development and OESC, the Oklahoma Workforce Commission now serves as the strategic facilitator responsible for advancing a cohesive, results-oriented workforce development strategy and cross-agency alignment of workforce initiatives.

Under this coordinated governance framework, the Governor's Council provides strategic direction and employer-driven priorities; the Oklahoma Workforce Commission serves as the strategic facilitator for alignment, coordination, and performance coherence across workforce programs; and OESC administers WIOA programs and carries out associated policy, fiscal, and

compliance responsibilities in accordance with federal and state law. This structure strengthens accountability while preserving program integrity and statutory roles.

As part of this transition, the State is moving toward a more functionally aligned workforce system. Rather than organizing workforce activities solely around individual programs, Oklahoma is defining responsibility and accountability for core workforce functions, such as employer engagement, participant intake and assessment, service coordination, training alignment, and performance management, across agencies and funding streams. This approach is intended to reduce duplication, improve service coordination, and ensure that workforce development activities are organized around outcomes for job seekers and employers.

Since becoming operational, the Oklahoma Workforce Commission, in coordination with the Governor's Council and OESC, has initiated implementation activities that include cross-agency system mapping, identification of duplicative administrative functions, alignment of statewide performance indicators, and development of a unified framework to guide service delivery improvements. These efforts support the State's goal of strengthening efficiency, transparency, and accountability across the workforce system.

Oklahoma continues to maintain a broad and robust network of workforce partners. In addition to the core WIOA programs, required one-stop partners include Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs Program, Senior Community Service Employment Program, Temporary Assistance for Needy Families, Trade Adjustment Assistance programs, Unemployment Compensation, and YouthBuild. Faith-based and community-based organizations also play an important role in supporting American Job Center service delivery and participant success.

While credential attainment remains an important component of Oklahoma's workforce strategy, the State is refining its approach to emphasize credentials of value that align with employer demand, career progression, and measurable employment outcomes. Workforce partners are expected to align their efforts and actively coordinate resources to strengthen the education-to-workforce pipeline and ensure that workforce development activities support meaningful employment opportunities for all Oklahomans.

The Strength and Weaknesses of the State's Workforce Development Activities:

Oklahoma's workforce system benefits from a skilled and resilient workforce, experienced workforce professionals, and diverse industries across all 77 counties. These strengths provide a strong foundation for system improvement.

Historically, challenges included high numbers of adults without a high school diploma, inconsistent strategies across workforce stakeholders, fragmented administrative structures, and siloed policy development with limited systemwide accountability. These conditions informed the Task Force findings and directly shaped the reforms described above.

Recent executive and administrative actions and renewed collaboration among core partners represent deliberate steps to address these challenges. Through functional alignment, centralized coordination, and performance-focused governance, Oklahoma is actively

implementing changes intended to strengthen system effectiveness, improve outcomes, and ensure accountability across the workforce development system.

State Workforce Development Capacity:

The entities listed below collectively support workforce delivery, policy alignment, and service integration across Oklahoma, with roles defined by statute, executive direction, and interagency coordination mechanisms.

Stakeholders:

GOVERNOR'S COUNCIL FOR WORKFORCE AND ECONOMIC DEVELOPMENT (GCWED)

In its state board role, the Council provides statewide strategic direction, approves policy and performance priorities, oversees alignment of WIOA Titles I–IV, and advises the Governor on workforce system priorities. Upon the effective date of the single-area designation, the Governor's Council for Workforce and Economic Development will carry out the functions of the local workforce development board consistent with WIOA and its implementing regulations, and the Governor will carry out the statutorily assigned responsibilities of the Chief Local Elected Official.

LOCAL WORKFORCE DEVELOPMENT BOARDS AND LOCAL ELECTED OFFICIALS

Oklahoma's designated Local Workforce Development Boards and Local Elected Officials continue to operate under their current authority and approved local plans. Local Boards carry out statutorily assigned responsibilities, including local planning, oversight of one-stop service delivery, selection of service providers and one-stop operators, and performance oversight, in partnership with Local Elected Officials.

Local Elected Officials retain responsibility for local area designation agreements, appointment of local board members, and local fiscal oversight consistent with WIOA requirements.

OKLAHOMA WORKFORCE COMMISSION (OWC)

The Oklahoma Workforce Commission provides strategic facilitation and supports the implementation of statewide workforce strategies through interagency collaboration, system alignment efforts, and stakeholder engagement.

OKLAHOMA EMPLOYMENT SECURITY COMMISSION (OESC)

OESC administers WIOA Title I-B Adult, Dislocated Worker, and Youth programs; Wagner-Peyser Employment Services (Title III); the Jobs for Veterans State Grants (JMSG) program supporting Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVERs); and the Unemployment Insurance program. OESC delivers labor exchange, reemployment, and employer services through statewide physical and virtual access points. The agency provides labor market information, data infrastructure, participant reporting, and performance accountability systems that support both current local operations and future statewide alignment.

OKLAHOMA DEPARTMENT OF CAREER AND TECHNOLOGY EDUCATION (CAREERTECH)

CareerTech administers career and technical education programs under the *Strengthening Career and Technical Education for the 21st Century Act (Perkins V)* and delivers industry-

aligned training, adult education and literacy services through designated providers, and short-term credentialing aligned with labor market demand. Through these efforts, CareerTech plays a central role in developing career pathways, expanding industry-recognized credential attainment, and supporting employer-driven upskilling strategies across Oklahoma's workforce system.

OKLAHOMA DEPARTMENT OF REHABILITATION SERVICES (DRS)

DRS administers WIOA Title IV Vocational Rehabilitation and Services for the Blind programs. The agency provides individualized employment services, assessments, assistive technology, accommodation expertise, and employer consultation to ensure individuals with disabilities have equitable access to workforce services statewide.

OKLAHOMA STATE DEPARTMENT OF EDUCATION (OSDE)

OSDE oversees K–12 education, career-readiness initiatives, and youth transition planning, including services for students with disabilities. OSDE supports career exploration, foundational academic skill development, and alignment of secondary education with postsecondary and workforce pathways.

OKLAHOMA DEPARTMENT OF HUMAN SERVICES (OKDHS)

OKDHS administers TANF, SNAP, childcare subsidy, and other support programs essential to participant stabilization. The agency provides assessment, case management, and wraparound supports coordinated with workforce and training partners.

OKLAHOMA DEPARTMENT OF COMMERCE (COMMERCE)

Commerce serves as the state's lead economic development entity, providing labor market analysis, industry intelligence, and employer engagement support to align workforce strategies with statewide and regional economic priorities.

OKLAHOMA DEPARTMENT OF CORRECTIONS (ODOC)

ODOC provides education, training, and reentry services for individuals who are incarcerated or under supervision, including Career Tech training within facilities, career-readiness instruction, and coordinated reentry planning with workforce partners.

OKLAHOMA STATE REGENTS FOR HIGHER EDUCATION (OSRHE)

OSRHE oversees public higher education institutions and supports degree and certificate programs, adult re-engagement initiatives, research capacity, and financial aid administration aligned with statewide credential attainment and workforce needs.

OFFICE OF THE GOVERNOR

The Governor provides overarching leadership and policy direction for Oklahoma's workforce system, including issuance of executive directives, designation of workforce areas, and alignment of workforce and economic development priorities.

OFFICE OF THE LIEUTENANT GOVERNOR

The Lieutenant Governor contributes to employer outreach, entrepreneurship advocacy, and business development efforts that inform workforce priorities and system alignment.

STATE CHAMBER OF OKLAHOMA

The State Chamber represents employers statewide and provides industry insight into workforce challenges, economic trends, and skill needs, supporting sector strategies and employer engagement.

LOCAL COMMUNITY ORGANIZATIONS

Native American Tribes and community-based organizations collaborate with state and local workforce partners to provide outreach, barrier-removal supports, specialized training, and culturally responsive engagement, expanding access for populations with significant barriers to employment.

U.S. DEPARTMENT OF LABOR (USDOL)

USDOL provides federal funding, regulatory guidance, performance oversight, and technical assistance for WIOA implementation and ensures state compliance with federal requirements.

B. STATE STRATEGIC VISION AND GOALS

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

1. VISION

Describe the State's strategic vision for its workforce development system.

2. GOALS

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment⁸ and other populations.⁹

(B) Goals for meeting the skilled workforce needs of employers.

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

3. PERFORMANCE GOALS

Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

4. ASSESSMENT

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment, which may include evaluation findings, and other feedback to make continuous or quality improvements.

Vision:

Oklahoma's workforce development vision has been informed by extensive system review and stakeholder engagement, including the work of the Oklahoma Workforce Transformation Task Force. That review identified longstanding fragmentation across workforce programs and partners, captured by the observation that "everyone in state government does workforce development, but no one owns it." The Task Force's findings emphasized the need for clearer accountability, stronger coordination, and a more unified statewide approach to workforce strategy.

In response, Oklahoma has taken deliberate steps to strengthen governance, coordination, and accountability across its workforce system while maintaining compliance with the Workforce Innovation and Opportunity Act (WIOA). Executive actions and administrative changes have clarified roles, centralized key administrative functions, and reinforced alignment between workforce development and economic priorities.

Oklahoma's workforce vision is to meet the needs of employers through a skilled workforce while promoting economic growth and self-sufficiency for individuals facing barriers to employment, as defined under WIOA. This vision is grounded in the following principles:

- Public stewardship of workforce resources with transparency and accountability to taxpayers
- Strong alignment between workforce development and economic development priorities
- Meaningful engagement of employers and industry leaders to inform workforce strategy
- Collaboration across state agencies, education and training providers, and community partners
- Data-informed decision-making and performance accountability
- Innovation and continuous improvement to improve outcomes for job seekers and employers
- Efficient use of public funds to maximize impact and reduce duplication

On August 10, 2023, Executive Order 2023-21 was filed with the Oklahoma Secretary of State, transferring responsibility and authority to administer WIOA programs to the Oklahoma Employment Security Commission (OESC). This action was taken to strengthen administrative

efficiency, improve coordination, and ensure that Oklahoma remains competitive nationally and globally.

Together, these principles reflect Oklahoma's commitment to a unified, employer-responsive, and outcomes-focused workforce development system that is accessible statewide and grounded in data, accountability, and collaboration.

Goals:

To advance its workforce vision, Oklahoma has established goals that strengthen workforce preparation, expand equitable access to education and training, and ensure that talent development is responsive to employer needs. These goals emphasize alignment, collaboration, and accountability across the workforce system and are directly informed by the economic, workforce, and workforce development analyses described in Section II(A).

Preparing an educated and skilled workforce and meeting the skilled workforce needs of employers are mutually reinforcing objectives. Oklahoma's workforce partners work collaboratively to improve outcomes for job seekers and employers through coordinated planning, effective use of resources, and continuous system improvement.

A. Goals for Preparing an Educated and Skilled Workforce

1. Expand Credential and Degree Attainment

Increase the number of Oklahomans earning high school diplomas, postsecondary credentials, and industry-recognized certifications, with particular focus on adults without a diploma, to strengthen pathways into high-demand and high-wage careers.

2. Strengthen Career Readiness for Youth

Expand career exploration, work-based learning, pre-apprenticeship, and apprenticeship opportunities so that students graduate with clear pathways into education, training, or employment.

3. Support Individuals with Barriers to Employment Through Coordinated Services

Improve coordination among workforce, education, and human services partners to support individuals with disabilities, veterans, justice-involved individuals, English learners, parents, and low-income Oklahomans through access to supportive and wraparound services.

4. Increase Access to Lifelong Learning and Adult Upskilling

Promote flexible, modular, and competency-based education and training opportunities that support adult learners adapting to changing workforce demands in high-growth sectors such as energy, health care, aerospace, advanced manufacturing, and information technology.

5. Advance Equity and Rural Access

Expand access to workforce services and training opportunities for rural communities, tribal nations, and underserved populations through a combination of physical access points, partnerships, and technology-enabled service delivery.

6. Expand Registered Apprenticeship and Work-Based Learning

Increased awareness, participation, and employer engagement in registered

apprenticeship and other work-based learning models to support paid, employer-connected pathways into employment.

B. Goals for Meeting the Skilled Workforce Needs of Employers

1. **Build Employer-Informed Talent Pipelines**
Align education and training programs with employer-validated skill needs using labor market information, sector engagement, and ongoing employer feedback.
2. **Strengthen Sector Partnerships and Industry Strategies**
Support sector-based strategies in high-growth industries to better coordinate partners, reduce duplication, and deliver solutions responsive to employer demand.
3. **Promote Responsive and Flexible Training Models**
Encourage training approaches that allow employers to upskill workers efficiently while enabling job seekers to progress along defined career pathways.
4. **Improve Coordination of Business Services**
Enhance collaboration among workforce partners to reduce duplication of employer outreach and improve the consistency and quality of business services.
5. **Improve Data Transparency and Workforce Insights**
Strengthen the use of labor market information, program performance data, and outcome reporting to inform employers, policymakers, and system partners.
6. **Strengthen Performance Accountability and Stewardship of Public Funds**
Promote responsible use of public resources, performance accountability, and continuous improvement to ensure workforce investments are focused on outcomes for job seekers and employers.

Long-Term System Outcomes

Through sustained collaboration and alignment, Oklahoma seeks to achieve:

- Increased labor force participation
- Reduced unemployment
- Growth and retention of private businesses
- Stronger alignment between education, training, and workforce opportunities
- Expanded access to diverse career pathways for all Oklahomans

Performance Goals:

Performance targets reflect federally negotiated primary indicators of performance applicable to each core program, consistent with WIOA section 116 and USDOL guidance.

See the following Program Year (PY) expected performance goals for the identified programs:

Employment 2nd Quarter After Exit:

- Title I Adult – PY26, 73.5% | PY27, 73.5%
- Title I Dislocated Worker – PY26, 75.7% | PY27, 75.7%

- Title I Youth – PY26, 76.5% | PY27, 76.5%
- Title II Adult Education and Family Literacy – PY26, 39% | PY27, 40%
- Title III Wagner Peyser – PY26, 62.2% | PY27, 62.2%
- Title IV Vocational Rehabilitation Program - PY26, 53% | PY27, 53.1%

Employment 4th Quarter After Exit:

- Title I Adult – PY26, 73.5% | PY27, 73.5%
- Title I Dislocated Worker – PY26, 75.0% | PY27, 75.0%
- Title I Youth – PY26, 79.0% | PY27, 79.0%
- Title II Adult Education and Family Literacy – PY26, 41% | PY27, 42%
- Title III Wagner Peyser – PY26, 63.0% | PY27, 63.0%
- Title IV Vocational Rehabilitation Program - PY26, 51.7% | PY27, 51.8%

Median Earnings 2nd Quarter After Exit:

- Title I Adult – PY26, \$7,677 | PY27, \$7,677
- Title I Dislocated Worker – PY26, \$10,000 | PY27, \$10,000
- Title I Youth – PY26, \$6,162 | PY27, \$6,162
- Title II Adult Education and Family Literacy – PY26, \$5,300 | PY27, \$5,350
- Title III Wagner Peyser – PY26, \$6,840 | PY25, \$6,840
- Title IV Vocational Rehabilitation Program - PY26, \$5,427 | PY27, \$5,500

Credential Attainment:

- Title I Adult – PY26, 73.5% | PY27, 73.5%
- Title I Dislocated Worker – PY26, 82.5% | PY27, 82.5%
- Title I Youth – PY26, 65.0% | PY27, 65.0%
- Title II Adult Education and Family Literacy – PY26, 31% | PY27, 32%
- Title III Wagner Peyser – Not Applicable
- Title IV Vocational Rehabilitation Program - PY26, 51.1% | PY27, 51.2%

Measurable Skills Gains:

- Title I Adult – PY26, 69.2% | PY27, 72.0%
- Title I Dislocated Worker – PY26, 71.0% | PY27, 75.0%
- Title I Youth – PY26, 72.8% | PY27, 72.8%
- Title II Adult Education and Family Literacy – PY26, 44% | PY27, 44.5%

- Title III Wagner Peyser – Not Applicable
- Title IV Vocational Rehabilitation Program - PY26, 72.5% | PY27, 72.6%

Effectiveness in Serving Employers:

- Baseline

Assessment:

Oklahoma assesses the effectiveness of its workforce development system through performance accountability measures required under the Workforce Innovation and Opportunity Act (WIOA), supplemented by systemwide review and continuous improvement efforts coordinated among state and local partners.

The state's approach to assessment has been informed by ongoing evaluation of workforce outcomes, fiscal stewardship, and service coordination, as well as by findings from the Oklahoma Workforce Transformation Task Force, which identified the need for improved alignment, reduced duplication, and clearer accountability across workforce programs and partners.

System performance is evaluated using federally required performance indicators, program-specific outcomes, and labor market information to assess how effectively workforce services support job seekers and employers. These measures are used to examine employment outcomes, credential attainment, earnings, and participant progress, as well as broader labor market trends relevant to workforce planning.

In addition to federally required measures, Oklahoma engages in cross-agency review of workforce activities to better understand system efficiency, coordination among partners, and responsiveness to employer needs. These reviews support identification of strengths, gaps, and opportunities for improvement across programs, regions, and populations served.

Use of Assessment Results

Assessment results are used to support continuous improvement across the workforce system. Oklahoma uses performance and evaluation findings to:

- Inform planning and policy development at the state and local levels
- Strengthen coordination among workforce, education, and human services partners
- Identify opportunities to improve service delivery and reduce duplication
- Target technical assistance and capacity-building efforts
- Support responsible stewardship of federal and state workforce funds

Transparency and Accountability

Oklahoma is committed to transparency and accountability in workforce system performance. Performance information is shared with partners, policymakers, and the public as appropriate to support informed decision-making and ongoing system improvement.

As Oklahoma advances system enhancements, including potential phased changes to governance and service alignment consistent with the Governor's announced intent, assessment

and evaluation practices will continue to evolve to reflect system capacity, data availability, and statutory authority, while maintaining full compliance with WIOA requirements.

C. STATE STRATEGY

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

1. DESCRIBE THE STRATEGIES THE STATE WILL IMPLEMENT, INCLUDING INDUSTRY OR SECTOR PARTNERSHIPS RELATED TO IN-DEMAND INDUSTRY SECTORS AND OCCUPATIONS AND CAREER PATHWAYS, AS REQUIRED BY WIOA SECTION 101(D)(3)(B), (D). "CAREER PATHWAY" IS DEFINED AT WIOA SECTION 3(7) AND INCLUDES REGISTERED APPRENTICESHIP. "IN-DEMAND INDUSTRY SECTOR OR OCCUPATION" IS DEFINED AT WIOA SECTION 3(23)

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE TO THE STATE TO ACHIEVE FULLY INTEGRATED CUSTOMER SERVICES CONSISTENT WITH THE STRATEGIC VISION AND GOALS DESCRIBED ABOVE. ALSO DESCRIBE STRATEGIES TO STRENGTHEN WORKFORCE DEVELOPMENT ACTIVITIES IN REGARD TO WEAKNESSES IDENTIFIED IN SECTION II(A)(2)

C. STATE STRATEGY

Oklahoma's workforce development strategies are designed to achieve a unified, demand-driven, and equitable system capable of meeting the needs of job seekers, workers, and employers statewide. These strategies align with federal priorities emphasizing industry-driven approaches, worker mobility, integrated service delivery, accountability for outcomes, and flexibility to support innovation. They reflect the state's economic and workforce conditions; address barriers identified in the analysis in Section II(A); and support increased system alignment, efficiency, and accountability across programs and partners.

Consistent with the Workforce Innovation and Opportunity Act (WIOA), Oklahoma has engaged in sustained, multi-year consultation regarding local workforce development area designation and has formally initiated designation consultation following the Governor's announced intent to transition to a single statewide local workforce development area. The strategies described below are designed to function effectively under current operational structures while supporting phased implementation under a single-area governance model, subject to completion of required consultation, public comment, and subsequent policy action.

1. Strategies for Sector Partnerships, In-Demand Occupations, and Career Pathways

(WIOA Sec. 101(d)(3)(B), (D); Sec. 3(7); Sec. 3(23))

Oklahoma will implement employer-led, data-driven strategies that expand sector partnerships, strengthen career pathways, and increase access to high-quality training, including Registered Apprenticeships.

Sector Partnerships

Oklahoma will expand and strengthen sector partnerships in key growth industries including aerospace and aviation, health care, energy, advanced manufacturing, information technology, and agriculture. These partnerships will:

- convene employers to identify shared skill needs;
- validate in-demand occupations using real-time labor market information;
- coordinate curriculum development with Career Tech, education entities, and training providers; and
- identify opportunities for work-based learning and career advancement.

As the administrative entity for WIOA Title I and the operator of the state's labor exchange, the Oklahoma Employment Security Commission (OESC) supports these partnerships through statewide sector strategy investments, technical assistance, labor market analysis, and alignment with statewide workforce priorities.

Industry Intermediaries and Conveners

Oklahoma will continue to collaborate with chambers of commerce, industry associations, economic development organizations, and other employer-led intermediaries to convene sector partnerships. These entities provide industry expertise, convening capacity, and credibility necessary to advance collaborative talent strategies.

Career Pathways Development

Career pathways will be developed and expanded through coordination among K–12 education, Career Tech, higher education, Adult Education (Title II), Vocational Rehabilitation (Title IV), and workforce partners. Pathways will:

- integrate academic, technical, and employability skills;
- embed industry-recognized credentials;
- include multiple entry and exit points supporting lifelong learning;
- incorporate work-based learning such as internships, pre-apprenticeships, on-the-job training, and Registered Apprenticeships; and
- address the needs of youth and individuals with barriers to employment.

The Workforce Commission, Governor's Council, and OESC will collaboratively ensure pathways remain aligned with critical occupations and employer demand.

Registered Apprenticeship and Work-Based Learning

Oklahoma will expand Registered Apprenticeship and other work-based learning models by:

- increasing partnerships with employers and training providers;
- supporting sponsors through navigation and technical assistance;
- integrating Registered Apprenticeships into career pathways; and

- exploring federal waiver opportunities, where appropriate, to improve access, particularly for youth and emerging programs.

These strategies support in-demand industry growth and expand earn-and-learn opportunities statewide.

2. Strategies to Align Core Programs and Achieve Fully Integrated Customer Services

To reduce fragmentation, improve accessibility, and strengthen outcomes, Oklahoma will advance statewide alignment strategies designed to function across governance models and support future system modernization.

Governance and System Alignment

As the State advances toward designation of a single statewide local workforce development area following completion of required consultation and public comment processes, governance and service delivery structures may be aligned, as appropriate, through subsequent policy actions and plan updates to support consistent expectations, centralized accountability, and unified policy direction.

Regardless of governance structure, Oklahoma will continue to coordinate roles across:

- the Governor’s Council for Workforce and Economic Development;
- the Oklahoma Workforce Commission; and
- the Oklahoma Employment Security Commission (OESC), as the administrative entity for WIOA Title I and operator of the Wagner-Peyser labor exchange.

This coordination supports statewide strategic alignment and performance accountability.

Shared Intake, Assessment, and Data Systems

Oklahoma will advance a statewide customer intake and triage approach supported by:

- standardized intake and referral processes across core partners;
- shared assessment tools, where appropriate;
- co-enrollment protocols across Titles I–IV; and
- continued development of centralized data infrastructure to support reporting, analytics, and performance monitoring.

These efforts reduce duplication, improve referrals, and support integrated service delivery.

Integrated Business Services

Oklahoma will continue to align business services across workforce, education, and economic development partners, including the Oklahoma Department of Commerce, regional and municipal chambers of commerce, industry alliances, the Oklahoma Department of Career and Technology Education, workforce development boards and alliances, and other economic development organizations, through:

- coordinated employer outreach strategies;

- sector-based engagement approaches;
- consistent delivery of incumbent worker training, layoff aversion, and customized recruitment; and
- streamlined employer points of contact.

This alignment ensures employers receive consistent, high-quality services statewide.

One-Stop System Strategies

Oklahoma will maintain physical American Job Centers while expanding access through partner locations, hybrid service models, and technology-enabled service points to support statewide consistency and local accessibility. The State will continue to:

- streamline Memoranda of Understanding and Infrastructure Funding Agreement processes;
- encourage co-location, shared staffing, and cross-training where feasible; and
- evaluate service delivery models to ensure access in both rural and urban communities.

This flexible approach supports local needs while advancing statewide consistency.

Addressing Identified Weaknesses

Oklahoma's strategies address challenges identified in economic and workforce analysis:

Identified Weakness	State Strategy
Fragmented governance and inconsistent service delivery	Enhanced statewide coordination, shared policies, and aligned oversight
Low credential attainment and adult education gaps	Expanded Adult Education (Title II), integrated pathways, targeted supports
Barriers to employment	Navigator functions, co-enrollment, braided supportive services
Employer disconnect	Sector partnerships, apprenticeships, coordinated business services
Limited shared data	Data integration, standardized metrics, performance reporting

3. Leveraging Federal and State Initiatives

Oklahoma will continue to align workforce strategies with federal and state initiatives including:

- Industry Driven Skills Training Grants supporting targeted workforce development in aerospace and defense, advanced manufacturing, and AI infrastructure;
- Technology hub initiatives in autonomous systems and semiconductor manufacturing;

- Oklahoma Department of Transportation partnerships for training and hiring; and
- Cross-agency efforts serving justice-involved individuals, veterans, and rural populations.

These initiatives expand employment opportunities and support emerging industry needs.

4. Alignment with WIOA Statewide Activities Authority

Under WIOA Sec. 134(a)(3)(A)(i), Oklahoma will invest statewide funds to support:

- sector partnership development;
- career pathways and curriculum alignment;
- work-based learning and Registered Apprenticeships;
- incumbent worker training;
- business services modernization; and
- data integration and continuous improvement.

These investments ensure system consistency, scalability, and readiness to support future governance decisions.

III. OPERATIONAL PLANNING ELEMENTS

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State's strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include—

1. STATE BOARD FUNCTIONS

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

Oklahoma has proposed transitioning to a single statewide local workforce development area, as directed by the Governor, to establish a unified governance and oversight structure intended to strengthen strategic alignment, improve consistency of service delivery, and enhance accountability across the state. Consistent with the Governor's direction and subject to approval of the waivers submitted with this Plan, the Governor's Council for Workforce and Economic Development will assume responsibility as both the State Workforce Development Board and the Local Workforce Development Board for all WIOA purposes. The Oklahoma Employment Security Commission serves as the administrative and fiscal entity for WIOA Title I programs and the lead operational agency for Wagner-Peyser, providing the infrastructure, monitoring, and data systems necessary to implement the Council's direction at scale.

Historically, Oklahoma used a System Oversight Subcommittee to identify system barriers, recommend cross-agency solutions, and support consistency among partners. Under the unified governance model, the functions previously carried out by this group have been absorbed and elevated into the work of the Governor's Council and its Executive Committee, ensuring that policy alignment, system improvement, and barrier resolution occur at the statewide level.

The intent of that earlier structure, increasing collaboration among the Oklahoma Department of Career and Technology Education administering programs under the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), Adult Education, Vocational Rehabilitation, Human Services, OESC, Higher Education, and other partners, remains central to the Council's work today. Those same agencies continue to participate in statewide policy development, barrier identification, and strategic planning, now through a governance model designed for greater clarity, efficiency, and authority.

Oklahoma's broader workforce transformation efforts are further supported through the Governor's Workforce Cabinet, which brings together education, workforce, and economic development leaders to strengthen alignment across agencies and advance statewide workforce strategy.

The Council carries out its responsibilities under WIOA §101(d) by establishing the overall strategic vision for the workforce system and approving statewide policies that align education, training, and employment programs. These policies reflect a continued emphasis on expanding career exposure for youth, increasing adult education and high school equivalency attainment, strengthening Registered Apprenticeships and work-based learning, improving employer engagement, and addressing barriers to employment. The Council uses labor market intelligence and economic analysis to identify priority industries and critical occupations, ensuring that statewide strategies respond directly to employer needs and economic development goals.

The Council directs alignment of core programs and partner agencies by ensuring coordinated service strategies, integrated career pathways, data sharing, and the use of common performance expectations. Through its Executive Committee and OESC, the Council oversees the development of statewide frameworks for customer service, co-enrollment, referrals, and data-informed decision-making. These coordinated efforts reflect the earlier system goals of creating customer-focused service delivery, improving consistency statewide, reducing duplication, expanding access to training and supportive services, and strengthening the link between economic development and workforce development.

The Council leads Oklahoma's performance accountability system by reviewing statewide performance data, assessing progress toward WIOA indicators, and directing improvement actions where needed. OESC supports this function through ongoing monitoring, compliance reviews, and the development of unified reporting systems that increase transparency and enable timely adjustments. The Council's monitoring and oversight functions build upon earlier objectives that emphasized data use, accountability, and system evaluation as tools for strengthening statewide outcomes.

The Council also oversees the one-stop delivery system by setting statewide certification standards, establishing expectations for accessibility and partner participation, and ensuring that Oklahomans receive consistent services regardless of where they enter the system. While

Oklahoma will continue to utilize American Job Centers and affiliate sites, the Council now guides a statewide approach to service integration that includes hybrid models, partner locations, and virtual access points. The prior focus on developing MOUs, resource-sharing agreements, and consistent operational expectations remains relevant. However, upon approval of the requested waivers, these activities will be carried out through centralized statewide processes rather than negotiated separately at the local level.

Employer engagement, sector strategies, and industry-led solutions remain essential components of Oklahoma's approach. The Council ensures that sector partnerships are aligned with statewide economic priorities and that they inform the development of training programs, career pathways, and work-based learning opportunities. The state continues to emphasize the importance of building strong relationships among businesses, education systems, and workforce partners to meet industry needs and strengthen Oklahoma's competitiveness.

The Council also ensures that the workforce system addresses the needs of populations facing barriers to employment, including individuals with disabilities, veterans, justice-involved individuals, rural residents, low-income adults and youth, English learners, and individuals lacking foundational skills. Strategies to support these populations, including coordinated supportive services, navigators, cross-agency referrals, and integrated career pathways, reflect the longstanding commitment to equitable access, carried forward under a unified governance structure that enhances statewide consistency.

Finally, the Council ensures continuous improvement by supporting evaluation efforts, encouraging innovation, and aligning funding to maximize system impact. The Executive Committee monitors implementation progress, identifies operational challenges, and elevates issues to the full Council for action. OESC implements the Council's decisions, manages federal and state resources, and oversees program operations to ensure compliance and performance.

Through this integrated governance structure, and subject to approval of the waivers submitted with this Plan, Oklahoma will fulfill all State Board functions required under WIOA while advancing a workforce system that is unified, accountable, and strategically aligned with the state's economic future.

2. IMPLEMENTATION OF STATE STRATEGY

Describe how the lead State agency with responsibility for the administration of each core program or a Combined Plan partner program included in this plan will implement the State's Strategies identified in Section II(c). above. This must include a description of—

A. CORE PROGRAM ACTIVITIES TO IMPLEMENT THE STATE'S STRATEGY

Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

These implementation activities emphasize industry-driven solutions, integrated service delivery, accountability for outcomes, and coordinated use of resources to support worker mobility and employer needs statewide. Core program implementation emphasizes shared

priorities, coordinated planning, and integrated service delivery across WIOA Titles I–IV and partner programs.

Oklahoma previously utilized a System Oversight Subcommittee to support cross-agency coordination and barrier resolution. The functions previously carried out through that workgroup are now conducted through statewide coordination led by the State Workforce Development Board and its Executive Committee. This approach strengthens accountability while maintaining active engagement of core and partner programs.

Statewide Coordination and Alignment of Core Programs

Under the current framework, the Governor’s Council for Workforce and Economic Development, as the State Workforce Development Board, provides strategic direction for implementation of statewide workforce strategies. The Council establishes policy priorities and ensures alignment across core programs, education partners, and economic development initiatives.

The Oklahoma Employment Security Commission serves as the administrative entity for WIOA Title I programs and the operator of the Wagner-Peyser labor exchange. In this role, OESC supports implementation through fiscal administration, monitoring, technical assistance, data systems, and coordination of statewide operational guidance. Other core program agencies, including Adult Education (Title II) and Vocational Rehabilitation (Title IV), implement aligned strategies within their respective statutory authorities while participating in shared planning and service coordination.

Core programs align activities through:

- shared statewide policy frameworks;
- coordinated planning and performance expectations;
- co-enrollment strategies, where appropriate, to maximize access to services and resources;
- referral protocols and navigator functions that support seamless customer movement across programs; and
- data-informed decision-making to improve outcomes and equity.

Co-Enrollment and Coordinated Service Delivery

Oklahoma uses co-enrollment as a service coordination strategy, where appropriate and based on assessed participant needs, to enhance access to education, training, and supportive services across WIOA Titles I–IV and partner programs. Eligibility for each program is determined independently in accordance with applicable federal and state requirements, and participants are enrolled only in those programs for which they are eligible and that support their individualized employment or education goals.

Co-enrollment is supported through coordinated intake, referral, and case management practices that promote collaboration among core and partner programs while maintaining clear program roles, fiscal integrity, and performance accountability. Each program retains

responsibility for allowable activities, funding decisions, and reporting requirements, ensuring compliance with program-specific statutory and regulatory provisions.

Core Program Activities Supporting State Strategy

Core program and partner activities funded to implement Oklahoma's workforce strategies include the following:

Research, Data, and Evaluation

Oklahoma is committed to strengthening data sharing and analytical capacity across the workforce system. Core programs support activities that:

- expand access to shared labor market and performance data;
- coordinate research and evaluation efforts across agencies;
- develop dashboards and reporting tools to support state and local decision-making; and
- use data to identify gaps, improve service delivery, and inform continuous improvement.

These activities support systemwide accountability by enabling timely performance monitoring, evaluation of effectiveness, and data-driven improvement across programs.

Career Pathways Development

Core programs collaborate with education partners, including K–12 education, Career Tech, higher education, and Adult Education, to support career pathways that:

- connect education and training to in-demand occupations;
- lead to industry-recognized credentials, certificates, or degrees; and
- provide multiple entry and exit points for adult learners, youth, and individuals with barriers to employment.

WIOA Title I, Title II, and Title IV programs align funding and services to support participant progression along these pathways.

Education and Industry Partnerships

Core programs engage employers and industry partners in the design and delivery of education and training activities. Funded activities support:

- sector partnerships aligned with key industries and critical occupations;
- expansion of Registered Apprenticeships and other work-based learning models;
- coordination between education providers and employers to ensure training relevance; and
- career exposure and exploration opportunities for students and job seekers.

These partnerships strengthen employer engagement and ensure workforce strategies respond to labor market demand.

Individual Career and Academic Planning

Oklahoma supports the use of Individual Career and Academic Plans (ICAPs) to help students and participants explore education and career options informed by Oklahoma labor market data. Core programs align services to reinforce career planning, transitions between education and training, and connections to employment opportunities.

Integrated Business Services

Core programs collaborate to deliver coordinated business services that support recruitment, retention, and workforce development needs of employers. Activities include:

- shared employer outreach strategies;
- alignment of incumbent worker training, layoff aversion, and customized recruitment services; and
- coordinated engagement with employers to reduce duplication and improve responsiveness.

This unified approach helps employers navigate workforce programs and strengthens relationships between businesses and the public workforce system.

Alignment Across Core and Partner Programs

Alignment among core programs and Combined Plan partners is achieved through statewide coordination mechanisms, shared policies, and common performance objectives. Co-enrollment, cross-referrals, and braided funding strategies are used where appropriate to meet participant needs and maximize available resources. These coordinated activities support consistent service delivery, improved customer experience, and effective use of federal and state workforce funds.

Through these strategies, Oklahoma maintains alignment between core program activities and the State's workforce vision while supporting coordinated service delivery across programs and partners. This approach supports continuity of services for job seekers and employers and strengthens coordination among workforce system partners as the State continues planning for the transition toward a single statewide local workforce development area, consistent with the Governor's announced intent and ongoing consultation conducted in accordance with WIOA requirements.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

Oklahoma aligns the core program activities described in Section A to implement the State's workforce strategies with programs and services provided by required and optional one-stop partners, as well as with employment, training (including Registered Apprenticeships),

education (including career and technical education), human services, and other related initiatives not covered by this Plan. Alignment efforts focus on coordination, shared priorities, and integrated service delivery to avoid duplication and maximize impact.

The Governor's Council for Workforce and Economic Development, with input from core workforce partners, the Oklahoma Department of Career and Technology Education administering career and technical education programs, higher education institutions, economic development representatives, and business leaders, previously adopted a strategic framework to guide WIOA implementation and statewide workforce alignment.

Oklahoma's CareerTech system, supported through *Perkins V (Perkins)*, plays a unique and central role in the state's workforce development ecosystem, providing industry-aligned technical education, short-term credentialing, and career pathway training that directly support employer demand across key industries. Alignment between the workforce system and CareerTech ensures that workforce services, education programs, and employer engagement strategies operate as a coordinated pipeline connecting education, training, and employment opportunities.

Many of the objectives within that framework align with the recommendations of the Workforce Transformation Taskforce and continue to inform Oklahoma's approach to aligning activities inside and outside this Plan.

That framework centers on four strategic objectives:

Objective 1: Expand Oklahoma's workforce to meet industry and economic development needs

- Support career exposure, exploration, and pathways for students and job seekers
- Increase targeted strategies for individuals with barriers to employment
- Analyze and address barriers to workforce participation
- Expand adult basic education and high school equivalency services

Objective 2: Upskill Oklahoma's workforce

- Expand Registered Apprenticeships and other work-based learning opportunities
- Strengthen career readiness across education and training systems
- Increase high school equivalency attainment
- Increase attainment of postsecondary credentials and degrees

Objective 3: Offer workforce solutions to Oklahoma's businesses

- Engage employers in program design and service delivery
- Provide responsive recruiting and talent development tools
- Expand incumbent worker training strategies
- Strengthen coordinated business services and sector partnerships

- Explore skills-based hiring approaches

Objective 4: Build statewide workforce system capacity

- Promote innovation and continuous improvement
- Diversify and align funding resources
- Expand data assets and analytic capacity

To advance these objectives, core programs and workforce partners align activities across Career Tech (Perkins V), education, workforce, human services, and economic development systems. This alignment is supported by statewide policy coordination, shared performance priorities, and structured collaboration designed to ensure resources are used effectively to support the education-to-workforce pipeline.

Implementation of Executive Order 2023-21 further supports alignment by designating the Oklahoma Employment Security Commission as the administrative entity for WIOA Title I programs. This alignment strengthens coordination between workforce policy, program administration, and labor exchange services, and supports the Governor’s goal of a more coordinated, efficient, competitive workforce system that delivers value to job seekers and employers.

Through the Governor’s Council, the Oklahoma Employment Security Commission, and the Oklahoma Workforce Commission, Oklahoma continues to align education and training activities at the state and system levels. Oversight, policy alignment, and system improvement functions previously carried out through separate workgroups are now coordinated through the Council’s governance and committee structures, with participation from core, required, and optional partners. These partners collaborate to:

- align policies and service strategies;
- coordinate data sharing, research, and evaluation activities;
- expand use of dashboards and modern analytic tools; and
- support continuous improvement and equitable outcomes.

These activities support transparency, performance accountability, and continuous improvement across the workforce system.

Alignment with activities outside the Plan is further supported through partnerships with Career Tech, higher education, K–12 education, Adult Education, Vocational Rehabilitation, human services agencies, economic development organizations, and employers. These partnerships ensure that education and training programs are informed by labor market demand, support career pathways, and provide opportunities for work-based learning and advancement.

Oklahoma’s alignment efforts are designed to create a comprehensive workforce system that:

- delivers user-friendly, customer-focused services that transcend individual programs;
- provides consistent, high-quality services to job seekers and employers statewide;

- reduces duplication through coordinated planning and service delivery;
- supports innovation while maintaining statewide consistency; and
- strengthens the talent pipeline needed for economic growth and competitiveness.

These strategies ensure that activities inside and outside this Plan function cohesively during the State's ongoing workforce system transition, while maintaining continuity of services and full compliance with WIOA requirements.

Consultation with Local Workforce Development Boards, Chief Elected Officials, and system partners regarding governance alignment and local workforce development area designation has occurred over multiple years and is ongoing, consistent with WIOA Section 106. Following sustained consultation and the absence of statewide consensus on local-area restructuring, the Governor has formally announced his intent to designate Oklahoma as a single statewide local workforce development area.

Oklahoma remains committed to coordinated, integrated workforce strategies that leverage activities inside and outside this Plan to meet the needs of workers, employers, and communities statewide.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.

Oklahoma promotes seamless, customer-centered service delivery through coordinated and aligned activities across core programs, Combined State Plan partner programs, and required and optional one-stop partner programs, including in rural and remote areas of the state. Core partners, including the Jobs for Veterans State Grant (JVSG) program and Local Workforce Development Boards (LWDBs), collaborate to deliver integrated services that streamline customer access, reduce duplication, and maximize the effective use of staff, facilities, and technology. This coordinated approach enhances customer experience, supports individuals with barriers to employment, and ensures services are delivered consistently with statutory requirements.

Common performance measures encourage shared accountability across core programs, including JVSG, and reinforce joint responsibility for outcomes within the one-stop delivery system. Customers may access career and training services based on individual need regardless of location, including comprehensive centers, affiliate sites, partner locations, specialized centers, or virtual service options consistent with WIOA § 678.300.

Coordination and alignment of services are supported through statewide and local policies governing the one-stop delivery system, including Memoranda of Understanding (MOUs) executed among required partners. These agreements define partner roles and responsibilities, service coordination, referral processes, infrastructure and operating cost sharing, and procedures to ensure access to services for individuals with barriers to employment, including

individuals with disabilities and those accessing services virtually. One-stop operators are designated through competitive processes to support effective coordination, oversight, and service integration.

Priority of service remains a foundational principle within Oklahoma's coordinated system. All core programs and the JVSG program maintain priority of service for veterans and other eligible persons, while also ensuring that individuals with barriers to employment such as persons with disabilities, unemployment insurance claimants, the long-term unemployed, dislocated workers, low-income individuals, individuals with limited English proficiency, youth, and individuals in rural or remote areas receive targeted support. Disabled Veterans' Outreach Program (DVOP) specialists deliver individualized career services to eligible veterans and eligible spouses with significant barriers to employment, including veterans experiencing homelessness and those participating in vocational rehabilitation. These services are integrated into the one-stop system so that veterans receive coordinated support alongside other workforce and supportive services.

The one-stop system delivers a continuum of career services that includes basic, individualized, and follow-up services. Basic career services provide customers with initial information and access to the workforce system. These services include initial assessments, eligibility determinations, information on available services, labor exchange and job search assistance, access to resource rooms and self-service tools, labor market information, information on in-demand occupations and Eligible Training Provider List offerings, referrals to partner programs, and information about supportive services and financial aid. These services are available in-person and, increasingly, through virtual tools that expand access to individuals in remote areas.

When customers need more intensive support, individualized career services are provided. These include comprehensive and specialized assessments, diagnostic testing, in-depth interviewing, development of an individual employment plan, career counseling, case management, and access to a range of training options. Training services may include occupational skills training, on-the-job training, work experience and internships, short-term pre-vocational services, English language acquisition, financial literacy activities, and out-of-area job search and relocation assistance. Individualized services are coordinated across partners to ensure that customers benefit from the strengths of each program while minimizing duplication.

Follow-up services are also an important part of the coordinated system. Consistent with WIOA requirements, follow-up services are made available for at least 12 months to adults and dislocated workers who obtain unsubsidized employment after receiving Title I services. These services may include ongoing career counseling, support with job retention and advancement, and referrals to additional training or supportive service resources as needed. As part of the single-area governance transition, the Governor's Council, with support from the Workforce Commission and OESC, sets statewide expectations for follow-up services and ensures they are implemented consistently through policy and technical assistance.

To support consistent service delivery, Oklahoma emphasizes cross-program coordination and staff collaboration. The state evaluates processes to identify opportunities for cross-training and shared learning among partner staff, improving referral accuracy, service alignment, and customer experience statewide. These efforts support integrated service delivery and help

ensure customers experience the workforce system as a single, coordinated network rather than separate programs.

Oklahoma also expands access to services through technology-enabled and mobile service delivery models, including virtual appointments, online workshops, digital resources, and mobile service units. These approaches supplement in-person services and help ensure individuals in rural and remote areas have equitable access to workforce services.

Through these coordinated strategies, Oklahoma's workforce system provides comprehensive, high-quality, customer-centered services to individuals statewide while supporting continuity of services during the transition toward a unified statewide governance structure.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

Oklahoma coordinates employer services across core programs, Combined State Plan partner programs, and required and optional one-stop partner programs to deliver comprehensive, high-quality solutions that respond to the current and projected workforce needs of employers. These efforts support industry and sector partnerships, align education and training with labor market demand, and ensure employer services are delivered in a coordinated and efficient manner consistent with the statutory requirements of each program.

Under the leadership of the Governor and the Governor's Council for Workforce and Economic Development, core partners work collaboratively to strengthen employer engagement and align workforce strategies with Oklahoma's economic development priorities. This coordination supports productive relationships among employers, workforce partners, education and training providers, and economic development entities to ensure workforce investments remain responsive to industry needs statewide.

The Oklahoma Employment Security Commission (OESC) plays a central role in coordinating employer services through its administration of Wagner-Peyser labor exchange activities, the Jobs for Veterans State Grant (JVSG), and WIOA Title I programs. OESC convenes regular coordination with core partners, including Vocational Rehabilitation, Adult Education, Career Tech, and Local Workforce Development Boards, to evaluate employer service delivery, identify gaps or duplication, and align strategies within the one-stop delivery system.

Employer Engagement and Service Delivery

Employer services are delivered through a coordinated business services framework that leverages the strengths of core and partner programs while avoiding duplication. Services provided through the one-stop delivery system and partner programs include, but are not limited to:

- Coordinated business outreach and engagement through Business Service Teams.
- Sector partnership development and employer councils.

- Customized recruitment, hiring events, and job fairs.
- Use of the state labor exchange system (EmployOklahoma) to connect employers with qualified applicants and provide applicant management tools.
- Labor market information and workforce data to support hiring and planning decisions.
- Rapid Response services to assist employers and workers during layoffs or business transitions.
- Incumbent worker training and work-based learning strategies, including Registered Apprenticeships.
- Industry-specific and customized training, including short-term, start-up, and process-change training.
- Adult education, high school equivalency, and industry-aligned training programs resulting in recognized credentials.
- Services and supports for employers hiring veterans, including engagement of JVSG staff.
- Work Opportunity Tax Credit, Federal Bonding, and other hiring incentives; and
- Vocational Rehabilitation services supporting candidate matching, accommodations, retention, and follow-up support.

Oversight, Alignment, and Transition to a Statewide Governance Model

Oversight of employer service strategies is provided by the Governor’s Council through its statutory responsibilities under WIOA, including policy guidance, system alignment, and performance accountability. Employer engagement strategies are reviewed and refined through statewide coordination to ensure services remain business-driven, responsive to labor market demand, and aligned with Oklahoma’s economic development goals. These oversight functions ensure employer services remain outcome-focused, efficient, and aligned with statewide performance and economic objectives.

Consultation with Local Workforce Development Boards, Chief Elected Officials, and workforce system partners regarding governance alignment and local area designation has occurred over multiple years and is ongoing. Following sustained consultation and the absence of statewide consensus on local-area restructuring, the Governor has formally announced his intent to designate Oklahoma as a single statewide local workforce development area and has issued written notice of formal consultation consistent with WIOA Section 106.

During this transition period, employer service coordination and delivery continue uninterrupted under existing operational arrangements. Local Workforce Development Boards, core partners, and one-stop partners continue to be responsible for delivering employer services consistent with current requirements. Any changes to governance or service delivery roles will occur only after completion of required consultation, public comment, and formal policy action, and will be implemented through a phased and deliberate transition process.

Through this coordinated approach, Oklahoma ensures that employers receive consistent, high-quality workforce solutions that support business growth, talent development, and the state’s long-term economic competitiveness.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS AND OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State’s Strategies will engage the State’s community colleges, adult education providers, area career and technical education schools, providers on the State’s eligible training

provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

Oklahoma's workforce development strategies depend on strong and intentional engagement with education and training providers across the state. Community colleges, Adult Education and Literacy providers, area Career and Technology Centers, registered apprenticeship sponsors, and Eligible Training Providers (ETPs) are integral partners in developing a job-driven education and training system that meets the needs of employers and expands opportunity for Oklahomans.

Unified Governance Supporting Education–Workforce Coordination

Under the state's modernized workforce governance structure, the Governor's Council for Workforce and Economic Development provides strategic policy leadership for the alignment of education and workforce strategies.

The Governor's Council includes senior leadership from K–12, Higher Education, and Career and Technology Education, ensuring that education partners are directly engaged in developing statewide priorities, sector strategies, and pathways aligned with employer demand.

OESC, as the administrative entity for WIOA Title I programs and the operator of Wagner-Peyser services, works closely with these partners to operationalize training strategies, manage the Eligible Training Provider List (ETPL), and coordinate program alignment with labor market needs.

Engagement with Education and Training Providers

Oklahoma engages education and training providers as active partners in the design, delivery, and continuous improvement of workforce development strategies. Community colleges, Adult Education and Literacy providers, area Career and Technology Centers, registered apprenticeship sponsors, and providers on the Eligible Training Provider List collaborate with workforce system partners to develop training programs aligned with labor market demand, expand access to industry-recognized credentials, and strengthen career pathways that connect education and employment opportunities.

Career and Technology Education (Career Tech)

Career Tech serves as a primary statewide training provider, offering industry-aligned credentials, customized training, Adult Education and Literacy programs, and flexible delivery options. Career Tech's statewide system provides critical infrastructure for workforce training and supports the development of employer-validated curriculum and credentials.

Higher Education Institutions

Community colleges and regional universities expand access to degree and certificate programs aligned with in-demand occupations. Institutions participate in sector strategies, provide stackable credential pathways, and develop training solutions that respond to employer-identified skills gaps.

Adult Education and Literacy Providers

Adult Education partners deliver foundational skills, high school equivalency preparation, and integrated education and training (IET) models linked to career pathways. These programs expand access to employment and training for individuals with barriers.

Eligible Training Providers

OESC oversees the ETPL and ensures that programs meet performance standards, align with in-demand occupations, and support the development of employer-validated skills. ETPL coordinators work with providers to expand training options statewide and maintain quality standards. These oversight activities support accountability, quality assurance, and alignment with labor market demand.

Consistent with Oklahoma's strategy to expand work-based learning opportunities, Oklahoma has requested federal flexibility related to ETPL eligibility requirements for Registered Apprenticeship programs. This flexibility supports the inclusion of state-developed Registered Apprenticeship programs and allows ETPL credential and performance reporting requirements to better align with apprenticeship training structures, expanding access to employer-driven training pathways.

Leveraging and Aligning State and Federal Investments

Oklahoma's strategy emphasizes coordinated use of federal, state, and local resources to expand access to education and training. This includes:

- Braiding funding across WIOA Titles I, II, III, and IV to support coordinated service delivery while maintaining program-specific eligibility, reporting, and fiscal accountability requirements.
- Leveraging Career Tech, Perkins-supported programs, and Higher Education infrastructure for training delivery.
- Coordinating between OESC, education partners, and required one-stop partners to maximize available resources.
- Supporting training expansion in rural and underserved areas through shared facilities and co-located services.

These aligned investments strengthen the state's ability to offer flexible training opportunities that respond to industry needs and support equitable access for job seekers.

Building a Job-Driven Talent Pipeline

The state's training strategies focus on:

- **Career Pathways:** Oklahoma continues to strengthen cross-agency collaboration to develop pathways beginning in K-12 and extending through adult education and postsecondary training. These pathways incorporate work-based learning, stackable credentials, and multiple on- and off-ramps to support diverse learner needs.
- **Credential Attainment:** The state prioritizes expanding access to industry-recognized credentials, high school equivalency completion, and postsecondary credentials that align with Oklahoma's high-demand sectors.

- **Registered Apprenticeship:** Oklahoma continues to increase and diversify Registered Apprenticeship programs, including youth, pre-apprenticeship, and adult apprenticeship opportunities. Education partners collaborate with apprenticeship sponsors to integrate classroom training, align related instruction, and expand access to earn-and-learn opportunities. To further support apprenticeship expansion, Oklahoma is pursuing flexibility within Eligible Training Provider List requirements to better align eligibility and reporting timelines with apprenticeship training structures.

F. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

Oklahoma's workforce strategies prioritize expanding access to recognized postsecondary credentials that are industry-validated, portable, and stackable, including Registered Apprenticeship certificates, licenses, certifications, and postsecondary degrees. These credentials are central to advancing worker mobility, meeting employer demand, and supporting long-term economic self-sufficiency.

Access to training leading to credentials of value is supported through statewide policies governing the Eligible Training Provider List (ETPL), career pathway development, and coordinated education and workforce partnerships. Training providers seeking to receive WIOA funds must meet established performance and reporting criteria to ensure alignment with in-demand occupations and labor market needs. Registered Apprenticeship programs, as evidence-based earn-and-learn models, are automatically included on the statewide ETPL, supporting expanded access to employer-driven training opportunities.

The ETPL, available through the EmployOklahoma system, serves as a primary tool for participants to identify approved education and training programs that lead to credentials aligned with Oklahoma's priority industries. Programs available through the ETPL include classroom-based, online, hybrid, and work-based learning options, supporting access for individuals in both urban and rural areas.

Oklahoma also leverages statewide career exploration and planning tools, including the Oklahoma Career Guide, to help individuals identify career pathways, assess skills and interests, and connect education decisions to labor market outcomes. These tools support informed customer choice and early alignment between education, training, and employment.

Registered Apprenticeship plays a critical role in expanding access to postsecondary credentials by enabling employers to serve as training providers and by offering paid, structured pathways into high-demand occupations. Oklahoma continues to expand and diversify Registered Apprenticeship opportunities for youth and adults, integrating apprenticeships into broader career pathways and aligning related instruction with postsecondary credentials.

Credential access strategies extend across the education continuum, including K–12, Career and Technology Education, Adult Education, and postsecondary institutions. Career pathways developed through these partnerships emphasize stackable credentials, integrated education

and training models, and multiple entry and exit points to support diverse learners, including individuals with barriers to employment.

Oklahoma also supports credential attainment for justice-involved individuals through Career Tech Skills Centers and related education and training programs operating in partnership with correctional institutions. These programs provide industry-aligned credentials that support successful reentry, reduce recidivism, and help meet employer demand in high-skill, high-wage, and in-demand occupations.

Through these coordinated strategies, Oklahoma improves access to postsecondary credentials that are responsive to employer needs, support equitable participation, and enables individuals to progress along career pathways leading to sustainable employment and economic mobility.

G. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

Coordinating with Economic Development Strategies

Oklahoma's workforce development strategies are closely aligned with the State's economic development priorities to ensure that talent development efforts support business growth, industry expansion, and long-term economic competitiveness. Coordination between workforce and economic development entities occurs at both the state and local levels and is embedded within governance, planning, and service delivery structures.

At the state level, the Oklahoma Department of Commerce and other economic development representatives participate in the Governor's Council for Workforce and Economic Development, which serves as the State Workforce Development Board. This structure ensures that workforce policies, sector strategies, and investment decisions are informed by economic development priorities and employer demand. Through this alignment, workforce strategies support targeted industries, major economic development initiatives, business attraction, retention, and expansion efforts.

The Oklahoma Employment Security Commission (OESC), in coordination with Career and Technology Education, Vocational Rehabilitation, and other core partners, works collaboratively with economic development entities to align employer engagement, labor market analysis, and workforce solutions. Shared use of labor market information, employer intelligence, and sector data supports identification of critical occupations, skills gaps, and workforce needs associated with economic development projects, site selection activities, and industry expansion efforts.

Local Economic Development Coordination

At the local level, workforce development and economic development activities are closely coordinated to support regional growth strategies and community-specific priorities. Local Workforce Development Boards, one-stop partners, and economic development organizations collaborate to:

- Identify and respond to workforce needs associated with new and expanding businesses;

- Support project-based recruitment and hiring efforts tied to economic development initiatives.
- Align training resources with targeted industries and occupations identified through regional economic development plans.
- Coordinate incumbent worker training, layoff aversion, and Rapid Response services to support business retention and workforce stability.
- Engage employers in sector partnerships, work-based learning opportunities, and career pathway development aligned with local labor market conditions.

These partnerships help ensure that workforce solutions are responsive to local economic conditions while remaining aligned with statewide priorities.

The Oklahoma Department of Commerce further supports local coordination through Rural Development Specialists who serve as on-the-ground connectors between businesses, workforce partners, education providers, and community leaders. These specialists work directly with employers to identify workforce challenges, facilitate referrals to workforce and training resources, and connect businesses to education and workforce partners capable of meeting talent needs.

Through coordination with local economic development entities, chambers of commerce, and community stakeholders, workforce partners support initiatives that strengthen labor force participation, expand access to high-quality employment opportunities, and promote equitable economic growth in urban, rural, and underserved areas.

Oklahoma's coordinated approach ensures that workforce investments support high-skill, high-wage, and in-demand occupations and that talent development strategies contribute directly to the State's economic competitiveness.

Through integrated governance, shared data, coordinated employer engagement, and aligned service delivery at both the state and local levels, Oklahoma ensures that workforce development activities directly support economic development strategies and contribute to sustainable economic growth statewide.

B. STATE OPERATING SYSTEMS AND POLICIES

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section **II Strategic Elements**. This includes—

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE MANAGEMENT SYSTEMS, JOB BANKS, ETC.).

Statewide Job Bank and Case Management

EmployOklahoma serves as Oklahoma's statewide job bank and case management platform for workforce programs administered by the Oklahoma Employment Security Commission (OESC), including Wagner-Peyser (Title III) and WIOA Title I programs. The system is available

statewide across all 77 counties and provides a centralized platform for job matching, employer engagement, labor exchange services, and case management activities.

EmployOklahoma supports coordinated service delivery by enabling workforce staff to document participant services, track progress, manage referrals, and support co-enrollment where appropriate. Employers use the system to post job openings, search for qualified candidates, and access recruitment tools, supporting alignment between workforce services and labor market demand.

Adult Education Data Systems

Adult Education and Family Literacy programs administered by the Oklahoma Department of Career and Technology Education utilize the Literacy, Adult, and Community Education System (LACES). LACES supports student intake, goal setting, progress tracking, and reporting for adult education, integrated education and training, and correctional education programs.

Data generated through LACES informs program planning, performance monitoring, and coordination with workforce partners by providing insight into participant progress, credential attainment, and transition outcomes. While LACES operates independently of EmployOklahoma, coordination between Adult Education and workforce partners supports referrals, aligned service strategies, and participant transitions along career pathways.

Vocational Rehabilitation Case Management

The Oklahoma Department of Rehabilitation Services (OKDRS) utilizes the AWARE case management system to administer services under Title IV of the Workforce Innovation and Opportunity Act. AWARE supports individualized service planning, case management, and reporting in compliance with U.S. Department of Education, Rehabilitation Services Administration requirements.

Coordination between AWARE and workforce partner systems occurs through established referral processes, shared planning, and cross-agency collaboration to support individuals with disabilities in achieving competitive integrated employment. These practices promote continuity of services while maintaining program-specific requirements and data integrity.

System Coordination, Data Use, and Continuous Improvement

Although Oklahoma's core programs utilize distinct operating systems, statewide policies and coordination structures support aligned implementation of workforce strategies. Core partners collaborate to share labor market information, analyze performance data, identify system gaps, and inform policy and investment decisions.

As Oklahoma advances workforce system modernization and transitions toward a unified statewide governance model, operating systems and data practices will continue to support consistent service delivery, transparency, and accountability. The State will build upon existing systems and coordination mechanisms to strengthen interoperability, improve data-informed decision-making, and support continuous improvement across the workforce system.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (FOR EXAMPLE, CO-ENROLLMENT POLICIES AND UNIVERSAL INTAKE PROCESSES WHERE APPROPRIATE). IN ADDITION, PROVIDE THE STATE'S GUIDELINES FOR

STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM AND ANY ADDITIONAL GUIDANCE FOR ONE-STOP PARTNER CONTRIBUTIONS.

Oklahoma's workforce system is supported by a comprehensive set of statewide policies designed to ensure coordinated service delivery, accountability for outcomes, fiscal integrity, and compliance with federal and state requirements. Policy development is collaborative and includes input from core partner agencies, Local Workforce Development Boards, subject matter experts, and workforce stakeholders. Policies are reviewed through committees of the Governor's Council for Workforce and Economic Development and formally ratified by the Council to ensure consistency with statewide workforce strategy.

Ongoing executive-level partner meetings, including core agency leadership and Local Workforce Development Board Directors, provide additional mechanisms for coordination, alignment, and continuous improvement of policies and operational practices.

The following policies support implementation of the State's workforce strategies and the effective operation of the one-stop delivery system:

Performance Incentive Awards for Local Workforce Boards: Defines the criteria and standards used to award performance-based incentives to Local Workforce Development Boards based on negotiated performance outcomes, fostering accountability and continuous improvement in program results.

WIOA Case Management and Common Exit: Establishes statewide procedures for WIOA case management, including definitions and operation of the Period of Participation, Categories of Enrollment, Categories of Exit, Career Services, Training Services, and the Common Exit process to ensure consistent service delivery and accurate reporting.

Access for All Star Accessibility Framework Phase I – Initial Assessment: Defines statewide criteria and procedures for the initial implementation of the Access for All Star Accessibility Framework, guiding assessment of certified comprehensive and affiliate Oklahoma Works American Job Centers to ensure accessibility and compliance with workforce service standards.

Fiscal Requirement, Procurement, and Contracting: Establishes statewide requirements governing fiscal accountability, procurement, contracting, and conflict-of-interest standards for WIOA-funded programs, ensuring compliance with federal and state regulations and consistent fiscal stewardship across the workforce system.

Grant Management: Defines statewide standards for the administration and use of WIOA grant funds, including training expenditure requirements, allowable fund transfers, expenditure sequencing (FIFO), and financial and performance reporting obligations.

Monitoring, Corrective Actions, and Sanctions: To establish the Governor's direction for the development and implementation of an Oversight and Monitoring Plan for recipients of federally funded workforce programs and grants administered by the Oklahoma Employment Security Commission. This issuance defines statewide standards for oversight, monitoring, corrective actions, and sanctions, and clarifies state and local responsibilities for subrecipient risk assessment, ongoing monitoring, and resolution of findings.

OK Works AJC Center Certification: Establishes statewide criteria and procedures for certifying American Job Centers and Oklahoma Works service delivery points, ensuring they meet required standards for accessibility, quality, integration of services, and compliance with WIOA and state policy.

Selective Service Registration: Defines the requirement for WIOA Title I program participants to be registered with the Selective Service when applicable, ensuring compliance with federal selective service and eligibility criteria.

Fraud and Incident Reporting: Establishes statewide expectations and requirements for the immediate reporting of fraud, waste, abuse, and other criminal activity in WIOA-funded programs, in accordance with TEGL 15-23 and 20 CFR 683.620, to ensure program integrity, accountability, and compliance.

Incumbent Worker Training Services: Defines statewide eligibility criteria and requirements for Incumbent Worker Training (IWT) under WIOA, including participant eligibility and employer eligibility for reimbursement, to support employer-driven skill development and retention.

Use of Grant Funds to Pay for the Cost of Meals, Food, Coffee or Other Refreshments: To guide the Local Workforce Development Boards on the provision of utilizing Federal funding to provide meals for external customers and employees.

Poverty Guidelines & LLSIL: To communicate the updated poverty guidelines released by the United States Department of Health and Human Services that may be used to calculate income levels to determine eligibility for participation in various state and federally funded programs and to prioritize services. This policy is updated annually as new federal guidelines are released.

WIOA Core Performance Measures and Performance Success: To communicate Oklahoma's guidelines under which Local Workforce Development Boards (LWDBs) must develop and implement procedures for the operation of the performance accountability system under WIOA. This guidance clarifies various aspects of the operational parameters and specifications of performance indicators.

Oklahoma Works Waiver Request Policy: To guide Oklahoma's program practitioners, workforce development boards, partner organizations, and others to clarify the state's policy and procedures on requests for WIOA flexibility waivers.

Nondiscrimination and Equal Opportunity Complaint Procedures: To guide the WIOA Section 188 Discrimination and Complaint Procedures.

Nondiscrimination and Equal Opportunity Corrective Actions and Sanctions: To inform grant recipients of the sanctions that may be imposed for violation of the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act (WIOA), and to outline the procedures to achieve voluntary compliance via corrective action/remedy.

Rapid Response Activities and Layoff Aversion: To communicate the State Policy concerning Rapid Response and Layoff Aversion activities conducted by the State and/or Local Rapid Response Teams and to establish a basic standard of service statewide.

Assessments: Defines statewide requirements and expectations for assessments used by Oklahoma Works one-stop centers to evaluate WIOA participants' skills, interests, and barriers to inform appropriate service strategies and career pathway planning.

Individual Employment Plan: To communicate Oklahoma's processes and procedures for the development of an Individualized Employment Plan (IEP) for each individual determined to be eligible for Title I Adult and Dislocated Worker programs. This policy establishes the minimum standards for procedures to be developed and adopted by each local workforce development area.

Local Board Certification: To provide guidance and process for the Local Workforce Development Board's two-year certification process.

Regional and Local Planning Instructions: To communicate Oklahoma's instruction for the local and regional plans under the Workforce Innovation and Opportunity Act.

Oklahoma Data Validation and Source Documentation Requirements: To guide the workforce system on the State of Oklahoma's Data Validation and Source Documentation Requirements for the WIOA Title I Programs and the Wagner-Peyser Employment Services as amended by Title III.

Title I Formula Programs and Job Corps Coordination: To guide to allow coordination between WIOA Title I formula fund program operators in the State's three workforce development areas where Job Corps centers are physically located.

Oklahoma Data Integrity and Secure Stewardship of Personally Identifiable Information (PII): To communicate Oklahoma's guidelines under which Local Workforce Development Boards (LWDBs) must develop and implement procedures for the oversight, monitoring, and review of participant data entered in EmployOklahoma.

Supplemental Information Collection: To guide the use of supplemental information within the Oklahoma Works workforce development system for the Chief Local Elected Officials (CLEOs) and the Local Workforce Development Boards (LWDBs) in carrying out the performance accountability requirements under WIOA section 116.

Adult and Dislocated Worker Programs: To clarify the coordination of training funds from other grant sources, including Federal Pell grants and other types of grant assistance for education and training services. Clarifications have also been made to the definition of Dislocated Worker Category I; to the Individual Employment Plan section regarding the documentation of case management activities; and to the determination of "unmet need". Finally, information has been added regarding the inability to utilize WIOA funds to pay for the cost of training for individuals who have a Federal Student Loan in default status.

Grievance and Complaint Process: To communicate Oklahoma's instructions for the grievance and complaint process under WIOA.

Worksite Agreement: To update the Worksite Agreement from WIA to WIOA; provide a standardized three-part Worksite agreement; and allow for the use of an alternative worksite time and attendance report, if applicable.

Roles and Responsibilities: To communicate the roles and responsibilities of various entities created as a result of the Workforce Innovation and Opportunity Act.

Nondiscrimination EO Policy: To communicate Oklahoma's process and procedures regarding nondiscrimination and equal opportunity procedures.

Transitional Jobs: To guide the workforce system on developing Transitional Jobs as a workforce strategy within the title I Adult and Dislocated Worker programs.

Oklahoma Works Branding: To communicate Oklahoma's common identifier, Oklahoma Works a Proud Partner of the American Job Center Network and guide the usage of the Oklahoma Works a Proud Partner of the American Job Center Network brand as part of all external communications.

Negotiation Performance Goals: To provide Local Workforce Boards with the State of Oklahoma's Performance Negotiation process for the WIOA Title I Programs and the Wagner-Peyser Employment Services as amended by Title III.

WIOA Title I Youth Program Guidance: Defines statewide policy and technical guidance for the implementation of WIOA Title I Youth programs, including youth program activities, eligibility pathways, and service expectations to support positive education and employment outcomes.

Limited English Language Proficiency: To communicate Oklahoma's process and procedures regarding the prohibition against national origin discrimination as it affects persons with Limited English Proficiency (LEP).

Eligible Training Provider List: To identify actions that meet requirements for training providers and training program eligibility for the state-eligible training provider list, as described in WIOA Section 122 and 20 CFR part 680. WIOA and its regulations established the allowable types of training, including both work-based and classroom instruction, to ensure provider performance, job-driven training, informed customer choice, continuous improvement, and cost-effective investment of public funds.

MOU Policy: Defines statewide guidance for the development and execution of required one-stop Memoranda of Understanding (MOUs) under WIOA, including expectations for partner participation, resource contributions, Infrastructure Funding Agreements (IFAs), and the State Funding Mechanism (SFM), to ensure equitable cost-sharing, collaborative service delivery, and compliance with federal partner contribution requirements. Phase I MOU Guidance (WSD-66-2024) outlines the basic MOU development and partner roles; Phase II MOU Guidance (WSD-37-2024) specifies infrastructure cost-sharing and State Funding Mechanism parameters

Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board: To guide local workforce development boards intending to redesignate within a region, consolidate, and/or become a new workforce area under WIOA.

Local Elected Official (LEO) Consortium Agreement: To provide guidance relating to the LEO Consortium Agreement to ensure the necessary regulatory and operational elements are described, included, and understood.

Oklahoma Governor's Council for Workforce and Economic Development Policy Issuance

Process: To provide a process whereby parties in the workforce development delivery system can have a voice in the issuances of policy and monitoring.

Process for Identification of Workforce Planning Regions: To provide guidance and process for the identification of Workforce Planning Regions in Oklahoma.

Process for Existing Local Workforce Development Area Conditional Designation: To guide to current and local workforce areas that did not meet the qualifications for initial designation.

Local Area Initial Designation: To provide guidance and process for the initial designation of Workforce Development Areas in Oklahoma, along with the process for appealing designation decisions.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

Oklahoma's workforce development system is administered through coordinated state agencies responsible for the four core programs under the Workforce Innovation and Opportunity Act (WIOA), with governance and oversight provided by the Governor's Council for Workforce and Economic Development (GCWED).

The Oklahoma Employment Security Commission (OESC) serves as the Governor's grant recipient and administrative entity for WIOA Title I programs, including Adult, Dislocated Worker, and Youth. OESC also administers Wagner-Peyser Employment Services (Title III) and the Jobs for Veterans State Grant (JVSG) program, and manages discretionary workforce grants, including National Dislocated Worker Emergency Grants.

Vocational Rehabilitation services under WIOA Title IV are administered by the Oklahoma Department of Rehabilitation Services (DRS). Adult Education and Family Literacy activities under WIOA Title II are administered by the Oklahoma Department of Career and Technology Education (ODCTE).

These core program agencies work collaboratively with the State Workforce Development Board, known in Oklahoma as the Governor's Council for Workforce and Economic Development. The Governor's Council advises the Governor on workforce priorities, establishes statewide workforce policy direction, and oversees implementation of workforce strategies across the State, including development and modification of the WIOA State Plan.

OESC provides staffing and operational support to the Governor's Council and its committees and is responsible for statewide workforce system planning, policy implementation, partner coordination, and performance monitoring. OESC also provides technical assistance and oversight to workforce planning regions and Local Workforce Development Boards under existing operational structures and coordinates Rapid Response activities statewide.

OESC operates under the direction of the Governor and the Cabinet Secretary of Workforce Development, with day-to-day operations led by an Executive Director.

As Oklahoma advances workforce system modernization, including transition toward a single statewide local workforce development area following sustained consultation and required federal approvals, the organizational roles described above support continuity of services, accountability, and coordinated delivery of workforce programs at both the state and local levels.

An organizational chart illustrating the structure and relationships among the Governor, State agencies, the State Workforce Development Board, and workforce partners is included as part of this Plan.

OESC provides staffing support for the Governor's Council and its committees, provides technical assistance to four planning regions and four local workforce development boards, and monitors their activities. It is responsible for workforce system planning and policy, and partner and resource development. It coordinates workforce system projects and provides strategic guidance to Local Workforce Development Boards. The office also coordinates Rapid Response activities for the state.

OESC is under the direction of the Governor and the Cabinet Secretary of Workforce Development. An Executive Director directs the office in the day-to-day operations.

Oklahoma's workforce development system is focused on creating the innovation needed to create and retain jobs, to raise the education and skill levels of its citizens, and to connect employers with the workforce they need. Oklahoma's goal is to be a comprehensive workforce development system that is fully integrated and accountable.

OKLAHOMA DEPARTMENT OF CAREER AND TECHNOLOGY EDUCATION ORGANIZATIONAL CHART

Governance Structure

- Governor of Oklahoma appoints members of the State Board of Education and the State Board of Career and Technology Education.
- The Oklahoma Senate confirms state board members.
- Board members represent each of Oklahoma's five Congressional districts plus one at-large district.

Structure of the State Board of Career and Technology Education

- Two State Department of Education Board members.
- Six State Board of Career and Technology Education members.
- The state director is the board's executive officer.
- The elected state superintendent of public instruction is the board's chair.

Governor

State Board of Career and Technology Education

Brent Haken
State Director/CEO

Ashley Rink
Executive Assistant to the State Director
and Secretary of SBCTE

Scott May
Assistant Attorney General

Lisa Batchelder
Chief Financial Officer

- Federal Grants Administration
 - American Rescue Plan Act
 - Perkins Administration
- Finance
- Regulatory Oversight

Eddie Compton

- Government/Military Relations

Justin Lockwood
Chief of Staff

- Agency Operations
 - Continuity of Operations Programs
- Facilities/Logistics
- Human Resources
- Information Management
- Skills Centers

Brent Meeks

- Auditor

Jessica Ventris
Director of Academic Affairs

- Accreditation
- CareerTech Testing
- Counseling and Career Development
- Dropout Prevention
- Leadership and Professional Development
- Resource Center

Cori Gray
Director of Student Success

- Agricultural Education
- Business, Marketing and Information Technology Education
- Family and Consumer Sciences Education
- Health Careers Education
- Science, Technology, Engineering and Mathematics
- Trade and Industrial Education

Gina Hubbard
Director of Statewide Outreach

- Annexations
- CareerTech Foundation
- Customer Grievance
- Legislation
- OkACTE Liaison
- Rules
- Special Projects
- Strategic Planning

Russell Ray
Director of Communications
& Marketing

- Advanced Media
- Creative Services
- Crisis Communication
- Internal and External Communications, including Website
- Printing Services

Max McKnight
Director of Workforce Training

- Adult and Career Development
- Adult Education & Family Literacy
- Jobs for America's Graduates
- OKAPEX
- Regional Coordinators
- Temporary Assistance for Needy Families
- Work-Based Learning
- Workforce and Economic Development



Kevin Stitt
Governor

David Ostrowe
Chief Operating Offices

Trae Rahill
Chief Executive Officer

Rose Peterson
Executive Assistant to CEO

Cody Cox
VP of Field Operations

- Regional and Local Field Office Operations
- Rapid Response
- Veterans Population
- Reemployment Services and Eligibility Assessment Program

DeAnna Smith
VP of Workforce Services

- Employer Tax
- WIOA Programs/Policy/Governance
- WIOA Monitoring Unit
- Communications
- Technical Systems & Support Center
- Foreign Labor Certification/State Monitor Advocate

Mark Davis
Chief Information Officer

- Information Technology (IT)
- Product Management Operations

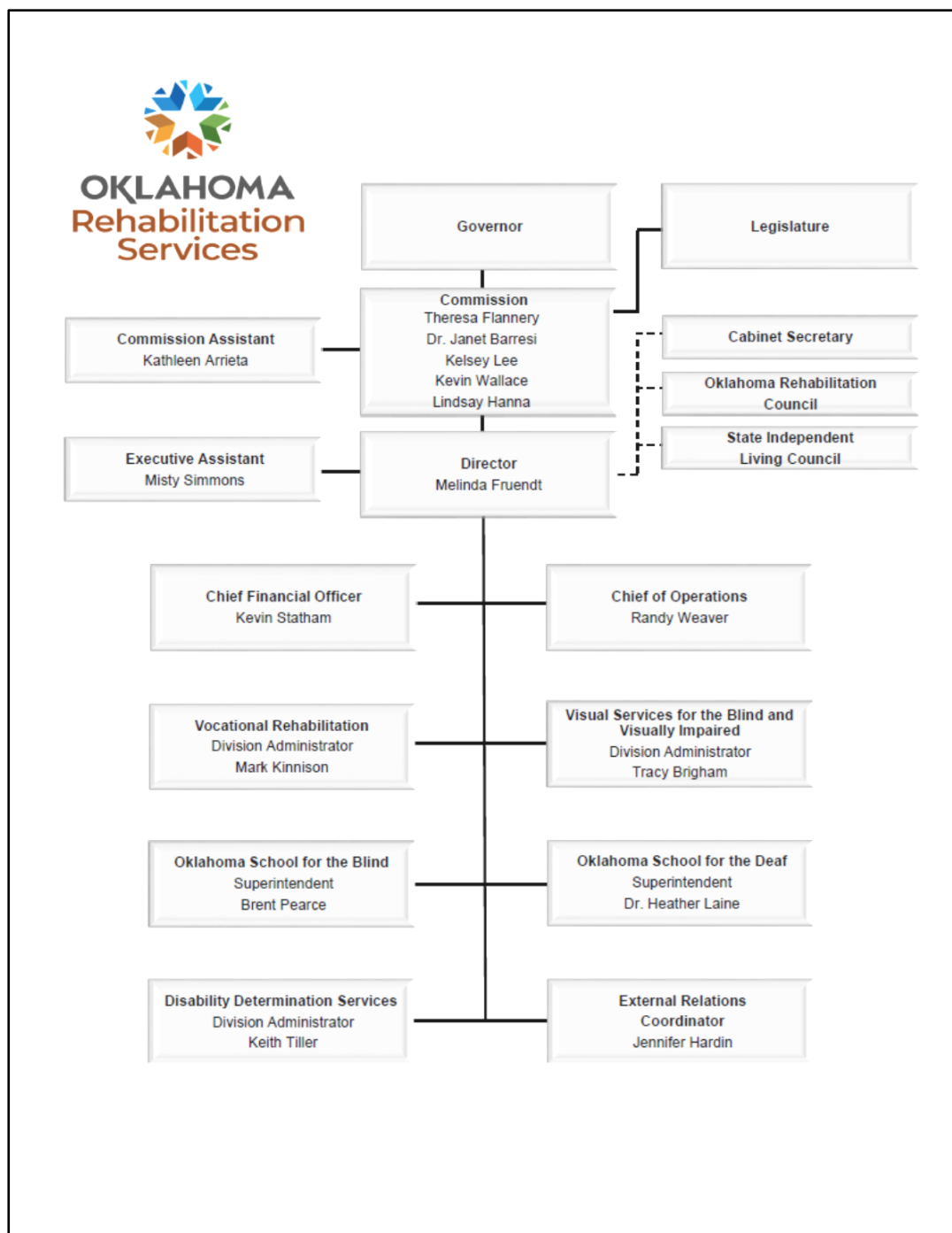
Chris O'Brien
VP of UI

- Service Center
- Adjudication
- Appeal Tribunal
- Quality Assurance/Reports
- UI Program and UI Systems
- Program Integrity

Michelle Britten
Chief Administrative Officer

- Finance, Operational Administrative Support
- Human Resources and People Development
- Economic Research and Analysis
- Compliance and Quality Control

Andrew Chilson
General Counsel



B. STATE BOARD

Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.

Oklahoma's State Workforce Development Board is the Governor's Council for Workforce and Economic Development (GCWED). The Governor's Council brings together leaders from business, labor, education, government, and community-based organizations to align workforce development with economic development and support the Governor's workforce and economic priorities.

The Governor's Council serves as the State Workforce Development Board under the Workforce Innovation and Opportunity Act (WIOA) and is business-led, with a majority of members representing private-sector employers with optimum policymaking or hiring authority, consistent with WIOA §101(b) and 20 CFR 679.110. Members are appointed by the Governor for staggered terms and continue to serve until a successor is appointed. Vacancies are filled by appointment of the Governor in accordance with statutory requirements.

State Board Functions and Activities

The Governor's Council carries out its responsibilities under WIOA §101(d) through the following activities:

- Establishing the strategic vision and policy direction for Oklahoma's workforce development system
- Approving and overseeing implementation of the WIOA State Plan and subsequent modifications
- Aligning workforce, education, and economic development strategies to meet employer demand
- Overseeing the one-stop delivery system, including certification standards and partner participation
- Monitoring system performance and accountability outcomes
- Supporting coordination among core programs and required and optional one-stop partners

The Council meets quarterly, with additional engagement occurring through standing and ad hoc committees to support policy development, strategic initiatives, and system oversight.

Committee Structure

The Governor's Council operates through committees to carry out its work efficiently and effectively. Recommendations developed by committees are presented to the full Council for consideration and action.

Executive Committee

In accordance with the Governor's Council Bylaws, the Executive Committee acts on behalf of the full Council, when necessary, subject to subsequent review and ratification. The Executive Committee supports strategic planning, committee coordination, and oversight of executive leadership and staff capacity. Membership consists of private-sector Council members, including, at minimum, the Chair, Vice-Chair, and a private-sector Co-Chair.

Healthcare Workforce Committee

Pursuant to Oklahoma statute, the Healthcare Workforce Committee functions as an advisory body to inform, coordinate, and support statewide efforts to ensure a well-trained, adequately distributed healthcare workforce. This committee facilitates collaboration among healthcare employers, education providers, and workforce partners to address workforce supply and demand challenges within the healthcare sector.

Additional ad hoc committees, such as those focused on youth programs or career pathways, are established as needed to support specific initiatives or emerging workforce priorities.

Staff Support

The Oklahoma Employment Security Commission (OESC) provides staffing and operational support to the Governor’s Council and its committees, including policy development, technical assistance, performance monitoring, and coordination with workforce partners. This support enables the Council to carry out its statutory functions effectively and consistently across the statewide workforce system.

Membership Roster

Nominations are currently being received for vacant positions. OESC and the Council Chair work in coordination with the Office of the Governor to ensure appointments remain compliant with WIOA §101(b) and 20 CFR 679.110–120.

A current membership roster, including members’ names, titles, organizational affiliations, and representation categories, is provided below.

Name	Title	Representing	Represents
Babu Peringol	President	Trinity Plaza, Inc. - Trinity Breaktime, Inc.	Private Sector/Small Business
Bill Coleman	State Senator	Oklahoma State Senate	State Elected Official
Brent Haken	State Director	Career Tech	Core Partner / ABE
Brian Hill	State Representative	OK House of Representatives	State Elected Official
Chase Beasley	Workforce Strategy & Development	American Airlines	Labor
Charles Gray (Chair)	President & CEO	Enterprise Solutions	Aerospace
Christopher Fusselman	Vice President - Sales	Tyler Media	Advertising
Cliff Stewart	Training Director	Electrician's Training Center	Apprenticeship - Training Program
Daniel Russell	Systems Engineer	Boeing Company	Aerospace
David Reid	President	Vox Printing, LLC	Labor
Dennis Luckinbill	Co-Manager	Acid Tank Leasing, LLC	Private Sector
Gov. Kevin J. Stitt or Designee	Governor	State of Oklahoma	State Elected Official
Heather Turner	Interim Executive Director	OK Dept. of Commerce	Core Partner / Admin. Entity
Jack O. Sherry	Owner/Broker	Jack Sherry Real Estate & Investments	Real Estate & Investments
Jacob Matherly	President/CEO	Matherly Mechanical	Labor

Jacob McHughes	County Commissioner	Cleveland County	Local Elected Official
Jamie Payne	Chief Human Resources Officer	Saint Francis Health System	Private Sector - Healthcare
Jeanie Webb	President	Rose State College	Education
Kristen Thompson	State Senator	Oklahoma State Senate	State Elected Official
Melinda Fruendt	Executive Director	OK Dept. of Rehab Services	Rehabilitation Services
Nico Ciccone	Director - Regulatory & Political Affairs	NextEra Energy Resources	Energy
Robin Arter	Executive Director	Think Ability, Inc.	Community Based Organization
Scott Fry	Talent Acquisition & Dev.	OK Ordnance Works Authority (MidAmerica Industrial Park)	Non-Profit / CBO
Stan Booker	Mayor of Lawton, OK	City of Lawton, Office of Mayor	Local Elected Official
Stan McCabe	Managing Partner	Key Personnel	Staffing Agency
Stephanie Vickers Regan	Community Relations Administrator	AAON	Manufacturing
Terry Adams	Director - OK Aviation Academy	Norman Public Schools	Education
Trae Rahill	Executive Director	OK Employment Security Commission	Unemployment Insurance. / W-P

4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP PROGRAM PARTNERS

A. ASSESSMENT OF CORE AND ONE-STOP PROGRAM PARTNER PROGRAMS.

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

Oklahoma assesses the effectiveness of its workforce development system using performance accountability measures and monitoring processes required under the Workforce Innovation and Opportunity Act (WIOA). Assessment activities focus on program performance, service quality, compliance, and alignment with state and local workforce priorities, and are conducted across core programs, required and optional one-stop partner programs, and Combined State Plan partner programs included in this Plan.

Assessment of Core Programs Under WIOA Section 116(b)

Core workforce programs are assessed annually based on the primary indicators of performance described in WIOA Section 116(b). These indicators include employment outcomes, earnings, credential attainment, measurable skill gains, and effectiveness in serving employers, as applicable to each program.

Oklahoma establishes negotiated performance levels for each core program and reviews actual outcomes against those levels to assess program effectiveness. Performance data are reviewed on a quarterly basis using information from the State's case management and reporting systems. Quarterly review allows the State and Local Workforce Development Boards to monitor progress, identify performance trends, and address potential performance concerns during the program year.

Assessment of One-Stop Partner and Combined Plan Programs

Required and optional one-stop partner programs and Combined State Plan partner programs are assessed through review of service delivery, coordination, and compliance with applicable statutory and regulatory requirements. Assessment activities consider the extent to which partner programs participate in the one-stop delivery system, support coordinated service delivery, and contribute to statewide and local workforce goals.

Evaluation of partner program activities includes review of service accessibility, referral processes, customer flow, and alignment with local and regional planning objectives. Assessments may be conducted at the local area or provider level, as appropriate, and are informed by monitoring results, program reporting, and partner feedback.

Education and Training Partner Coordination in Assessment

Consistent with State Plan requirements and federal guidance encouraging alignment between education and workforce systems, Oklahoma considers coordination with education and training partners as part of its workforce system assessment. This includes review of how Adult Education and Literacy providers, Career and Technology Education, higher education institutions, and Registered Apprenticeship programs participate in workforce planning and service delivery activities.

Assessment of this coordination focuses on documented alignment with in-demand occupations, participation in career pathway efforts, and use of industry-recognized credentials where applicable. These reviews are based on existing program reporting, planning documents, and monitoring activities, and do not replace program-specific accountability requirements for education partners.

Assessment of Local and Regional Planning Goals

Local Workforce Development Boards are responsible for assessing progress toward goals identified in approved local and regional plans. These assessments consider labor market conditions, employer needs, service delivery strategies, and outcomes for job seekers, including individuals with barriers to employment.

The State reviews local and regional assessments to evaluate alignment with statewide workforce priorities and to identify areas where additional technical assistance, policy clarification, or coordination may be needed. Assessment results are used to support continuous

improvement while recognizing differences in regional economic conditions and service delivery environments.

Monitoring and Program Oversight

The State conducts monitoring of core programs and one-stop partner activities at least annually to ensure compliance with WIOA requirements, fiscal integrity, and adherence to State policy. Monitoring responsibilities are shared between the State and Local Workforce Development Boards, consistent with statutory roles.

Monitoring activities include review of program operations, participant records, fiscal practices, and performance reporting. Findings from monitoring are used to identify corrective actions, technical assistance needs, and opportunities to strengthen service coordination.

Use of Assessment Results

Assessment and monitoring results are used to:

- inform state and local planning and policy decisions;
- support performance accountability and corrective action where needed;
- improve coordination among workforce system partners; and
- ensure responsible stewardship of federal and state workforce funds.

Through these assessment and evaluation processes, Oklahoma maintains oversight of workforce system performance while supporting alignment, accountability, and continuous improvement consistent with WIOA requirements and the State's strategic vision.

B. PREVIOUS ASSESSMENT RESULTS

For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

For the preceding two program years, Oklahoma assessed the effectiveness of its core workforce programs, one-stop partner programs, and Combined State Plan partner programs using performance accountability measures, monitoring activities, and review processes described in Section 4(A).

Summary of Performance Results

In Program Years 2022 and 2023, Oklahoma exceeded negotiated performance levels for the WIOA core programs for which targets were established. Performance results reflected positive outcomes across applicable indicators, including employment outcomes, credential attainment, and measurable skill gains for participants served through the workforce system.

Quarterly performance reviews and annual performance narratives demonstrated stable and consistent outcomes at both the state and local levels during the two-year assessment period.

These results supported continued confidence in existing service delivery structures, partner coordination, and oversight mechanisms.

Use of Data and Performance Analysis

Oklahoma's assessments use information derived from the State's data systems to analyze past and projected performance at the state and local levels. During the assessment period, there was an increased focus on strengthening data analysis to support timely, accurate, and actionable performance and program reviews. These assessments informed statewide strategy discussions and supported continuous improvement efforts aimed at promoting effective service delivery and positive participant outcomes.

The State continued to enhance data-driven decision-making by improving the quality, consistency, and use of available performance data across core and partner programs. Collaboration across the workforce system strengthened the State's ability to conduct deeper analysis and communicate performance information more effectively with core programs and the Governor's Council for Workforce and Economic Development.

Assessment Findings Related to System Operations

Assessment activities during the preceding two-year period also identified operational considerations relevant to system performance and oversight, including:

- the importance of maintaining compliance with local workforce board certification and membership requirements to support effective governance;
- ongoing monitoring of fiscal expenditure levels to ensure timely delivery of participant services;
- continued certification of one-stop centers to support service quality, accessibility, and compliance; and
- review of accessibility and accommodation practices to ensure individuals with disabilities can fully access workforce services, including assurances provided by Eligible Training Providers regarding facility accessibility and reasonable accommodations.

These findings were addressed through existing monitoring, certification, and corrective action processes at the state and local levels.

Labor Market and Workforce Demand Analysis

As part of the assessment process, Oklahoma reviewed labor market information, including analysis of unfilled jobs by occupation. This analysis confirmed continued demand in key industries and occupations identified through statewide workforce planning efforts and the Workforce Transformation Task Force. Assessment results reinforced the importance of aligning training investments, career pathways, and employer engagement strategies with documented labor market demand.

State Actions Informed by Assessment Results

Based on assessment results from Program Years 2022 and 2023, Oklahoma took actions consistent with continuous improvement principles, including:

- maintaining and refining monitoring and oversight processes for local workforce boards and one-stop centers;
- continuing quarterly performance review practices to support early identification of performance trends;
- communicating assessment findings to local boards and partners to inform corrective action where needed; and
- reinforcing the use of labor market information in statewide and local planning activities.

Where performance, programmatic, or fiscal integrity concerns were identified, the State communicated directly with local workforce board leadership and chief elected officials and required corrective or improvement actions as appropriate.

Ongoing Performance Review and Continuous Improvement

As part of its ongoing assessment approach, the State and its partners utilize a variety of performance review and coordination practices, such as regular performance discussions, periodic collaboration calls, data-focused briefings, and expanded access to performance information, to support informed adjustments and refinements at both the state and local levels. These practices reinforce a culture of continuous improvement while remaining consistent with existing program authority, reporting requirements, and statutory responsibilities.

Use of Assessment Results

Assessment results continue to inform statewide workforce planning, policy development, and technical assistance efforts. These results support alignment of workforce activities with employer demand, accountability for outcomes, and responsible stewardship of public funds.

C. EVALUATION

Describe how the State will conduct evaluations and research projects of activities carried out in the State under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA (WIOA Section 116(e)).

Consistent with Section 116(e) of the Workforce Innovation and Opportunity Act (WIOA), Oklahoma conducts evaluation and research activities as appropriate to support continuous improvement, accountability, and effective administration of the State's workforce system. Evaluation activities are designed to complement, not duplicate, federally led evaluations conducted by the U.S. Department of Labor and the U.S. Department of Education.

State Evaluation and Research Activities

Under the authority of the Governor's Council for Workforce and Economic Development (GCWED), the Oklahoma Employment Security Commission (OESC) may conduct, or support evaluation and analytical activities related to WIOA core programs. These activities are undertaken in collaboration with State and local workforce partners, including Local Workforce

Development Boards and agencies responsible for administering the respective core programs, and are aligned with existing program authority and available resources.

State-level evaluation efforts focus on examining program implementation, service delivery approaches, and outcomes using existing administrative data, performance reporting, monitoring results, and other relevant information. When appropriate, evaluation activities may also incorporate structured feedback from workforce partners, employers, and participants to better understand program effectiveness and operational challenges.

Coordination with State and Local Partners

Evaluation activities are coordinated with State and local workforce boards and core program agencies to ensure that research and analysis efforts reflect operational realities, local workforce needs, and statewide priorities. Findings from evaluation activities are shared with relevant partners to support informed decision-making, policy development, and continuous improvement across the workforce system.

Focus Areas for Evaluation and Analysis

When evaluation or research activities are conducted, they may examine workforce system functions such as:

- work-based learning and Registered Apprenticeship activities;
- career pathways and credential attainment;
- service coordination and co-enrollment practices, where applicable;
- employer engagement and business services; and
- career planning and navigation supports.

These focus areas align with the State's strategic priorities and workforce system goals, while remaining within existing statutory and administrative authority.

Coordination with Federal Evaluation Efforts

Oklahoma coordinates its evaluation activities with federal evaluation efforts conducted by the U.S. Department of Labor and the U.S. Department of Education, as required under WIOA Section 116(e). The State cooperates with federally sponsored research and evaluation projects by providing data, documentation, and technical assistance as appropriate, and ensures that State-level evaluation activities do not duplicate or conflict with federal efforts.

Use of Evaluation Findings

Findings from evaluation and research activities are used to inform workforce planning, policy refinement, technical assistance, and program improvement efforts. Evaluation results may be shared with the Governor's Council, State and local partners, and, where appropriate, the public through existing communication channels. These activities support transparency, accountability, and responsible stewardship of workforce resources.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

A. FOR TITLE I PROGRAMS

Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

I. YOUTH ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 128(B)(2) OR (B)(3)

In accordance with WIOA Section 128 (b)(3), the State of Oklahoma uses a discretionary allocation formula to successfully distribute funding for WIOA Title I Youth activities. Using the flexibility prescribed in WIOA enables the state to distribute funding based on required economic data as well as economic data specific to Oklahoma including historically low unemployment rates, regional variations, as well as barriers unique to Oklahoma's workforce.

Upon receipt of the federal Notice of Award (NOA), OESC calculates an 85% minimum amount of the state's total youth allocation to distribute to the designated local Workforce Development Areas (WDAs) in Oklahoma. The following factors and weighted values determine the amount of funding to be awarded to each area for Title I Youth Activities:

Areas of Substantial Unemployment – 23.333%

An Area of Substantial Unemployment (ASU), as defined by WIOA and the Bureau of Labor Statistics is a contiguous geographic area sufficient in size and scope to sustain a program of workforce investment activities, with a population of at least 10,000 and an unemployment rate of at least 6.5%. Oklahoma uses county level data to determine ASUs in Oklahoma.

The number of unemployed individuals with an ASU is summed and weighted calculating the appropriate dollar amount each ASU is to receive. A county that does not meet the criteria for an ASU does not receive funding for this formula factor.

Data Source: Data used to calculate ASUs is sourced by the BLS, Local Area Unemployment Statistics and the United State Census Bureau.

Excess Unemployment – 23.333%

Excess Unemployment is the number of unemployed individuals over 4.5% of the civilian labor force. Oklahoma uses county level data to determine excess unemployment in Oklahoma.

The number of unemployed individuals in excess of the calculated 4.5% in each county is divided by the total number of excess unemployed individuals calculating the appropriate dollar amount each county is to receive. A county that does not have an excess of unemployed individuals does not receive funding for this formula factor.

Data Source: Data used to calculate Excess Unemployment is sourced by the BLS, Local Area Unemployment Statistics.

Disadvantaged Youth – 23.333%

A Disadvantaged Youth is an individual aged 16 through 21 who received an income or is a member of a family that received a total family income, that does not exceed the poverty line or

70 percent of the lower living standard income level. Oklahoma uses county level data to determine the number of Disadvantaged Youth in Oklahoma.

The number of disadvantaged youth in each county is divided by the total number of disadvantaged youth in Oklahoma calculating the appropriate dollar amount each county is to receive. A county that does not have any disadvantaged youth does not receive funding for this formula factor.

Data Source: Data used to calculate Disadvantaged Youth is sourced by the United State Census Bureau as provided by the United States Department of Labor Employment & Training Administration.

Excess Youth Poverty – 30%

The percentage of population for whom poverty status is determined in Oklahoma is historically higher than that of the United States. Due to the significant impact living in poverty has on families and individuals, distributing funds to geographic areas with excessive poverty ensures resources are made available to WDAs whose workforce faces additional obstacles.

Excess Youth Poverty is the relative number of individuals, under the age of 18, living below the poverty level in a geographic area in which the percentage of population for whom poverty status is determined is greater than the state's percentage. Oklahoma uses county level data to determine the number of youth living in excess poverty.

The number of excess youth poverty in each eligible county is divided by the total number of excess poverty in all eligible counties across the state calculating the appropriate dollar amount each county is to receive. A county whose percentage of population for whom poverty status is determined less than or equal to the state's percentage does not receive any funding for the final formula factor.

Data Source: Data used to calculate Excess Youth Poverty is sourced by the United State Census Bureau.

To calculate the initial formula allocation for each area, the dollar amount calculated for each factor is summed by county then by WDA.

In the event the initial formula allocation determines an area is to receive less than 90% of the average percent share of the previous two year's percent share, the amount needed to increase said area(s) to the 90% minimum will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensures award amounts from year to year do not result in the often extreme fluctuations of unemployment, population, and poverty data. Additional information regarding the methodology for adjusting local area allocations in this fashion is available in OOWD Technical Assistance number TA-02-2016.

In the event the criteria for one or more formula factors prevents the state from distributing funding for said factor(s), an adjustment to the 90% methodology described above is made. Under these circumstances, each area under the 90% minimum allocation will be raised to meet the minimum. The undistributed balance is then disbursed based on their current percentage of the calculated total.

II. ADULT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) OR (B)(3)

Upon receipt of the federal NOA, OESC calculates an 85% minimum amount of the state's total adult allocation to distribute to the designated local WDAs in Oklahoma. The following factors and weighted values determine the amount of funding to be awarded to each area for WIOA Title I Adult activities:

Areas of Substantial Unemployment – 23.333%

An ASU, as defined by WIOA and the Bureau of Labor Statistics, is a contiguous geographic area sufficient enough in size and scope to sustain a program of workforce investment activities, with a population of at least 10,000 and an unemployment rate of at least 6.5%. Oklahoma uses county level data to determine ASUs in Oklahoma. The number of unemployed individuals with an ASU is summed and weighted calculating the appropriate dollar amount each ASU is to receive. A county that does not meet the criteria for an ASU does not receive funding for this formula factor. Data Source: Data used to calculate ASUs is sourced by the BLS, Local Area Unemployment Statistics and the United State Census Bureau.

Excess Unemployment – 23.333%

Excess Unemployment is the number of unemployed individuals over 4.5% of the civilian labor force. Oklahoma uses county level data to determine excess unemployment in Oklahoma. The number of unemployed individuals more than the calculated 4.5% in each county is divided by the total number of excess unemployed individuals calculating the appropriate dollar amount each county is to receive. A county that does not have an excess of unemployed individuals does not receive funding for this formula factor. Data Source: Data used to calculate Excess Unemployment is sourced by the BLS, Local Area Unemployment Statistics.

Disadvantaged Adults – 23.333%

A Disadvantaged Adult is an individual aged 22 through 72 who received an income, or is a member of a family that received a total family income, that does not exceed the poverty line or 70 percent of the lower living standard income level. Oklahoma uses county level data to determine the number of Disadvantaged Adults in Oklahoma. The number of disadvantaged adults in each county is divided by the total number of disadvantaged adults in Oklahoma calculating the appropriate dollar amount each county is to receive. A county that does not have any disadvantaged adults does not receive funding for this formula factor. Data Source: Data used to calculate Disadvantaged Adults is sourced by the United State Census Bureau as provided by the United States Department of Labor Employment & Training Administration.

Excess Adult Poverty – 30%

The percentage of population for whom poverty status is determined in Oklahoma is historically higher than that of the United States. Due to the significant impact living in poverty has on families and individuals, distributing funds to geographic areas with excessive poverty ensure resources are made available to WDAs who workforce faces additional obstacles. Excess Adult Poverty is the relative number of individuals, aged 18 to 64, living below the poverty level in a geographic area in which the percentage of population for whom poverty status is determined is greater than the state's percentage. Oklahoma uses county level data to determine the number of adults living in excess poverty. The number of excess adult poverty in each eligible county is

divided by the total number of excess poverty in all eligible counties across the state calculating the appropriate dollar amount each county is to receive. A county whose percentage of population for whom poverty status is determined less than or equal to the state's percentage does not receive any funding for the final formula factor. Data Source: Data used to calculate Excess Adult Poverty is sourced by the United State Census Bureau.

To calculate the initial formula allocation for each area, the dollar amount calculated for each factor is summed by county and then by WDA. In the event the initial formula allocation determines an area is to receive less than 90% of the average percent share of the previous two year's percent share, the amount needed to increase said area(s) to the 90% minimum will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensures award amounts from year to year do not result in the often extreme fluctuations of unemployment, population, and poverty data. Additional information regarding the methodology for adjusting local area allocations is available in policy. In the event the criteria for one or more formula factors prevents the state from distributing funding for said factor(s), an adjustment to the 90% methodology described above is made. Under these circumstances, each area under the 90% minimum's allocation will be raised to meet the minimum. The undistributed balance is then disbursed based on their current percentage of the calculated total.

III. DISLOCATED WORKER EMPLOYMENT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) AND BASED ON DATA AND WEIGHTS ASSIGNED

Following WIOA Section 133(b)(2), Oklahoma uses a six-factor formula to distribute funding for WIOA Title I Dislocated Worker activities. The formula factors use available data that most accurately describes the economic status and need for dislocated worker funding across Oklahoma. Upon receipt of the federal NOA, the OESC calculates a 60% minimum amount of the state's total dislocated worker allocation to distribute to the designated local WDAs through the state. The following factors and weights determine the amount of funding to be awarded to each area for Title I Dislocated Worker activities:

Unemployment Insurance – 25%

Unemployment Insurance, as a formula factor, is an average of the number of allowed unemployment claims filed over 12 months in a geographic area. Oklahoma uses county-level data to determine the number of allowed unemployment claims filed. The average number of unemployment claims filed over 12 months in each county is divided by the total average number of unemployment claims filed over 12 months calculating the appropriate dollar amount each county is to receive. Data Source: Data used to calculate Unemployment Insurance is sourced by the Oklahoma Employment Security Commission.

Long-Term Unemployment – 20%

Long-term unemployment is the number of individuals who have been unemployed for 15 weeks or more in each county with the number of individuals who have been unemployed for 15 weeks or more across the state. Oklahoma uses county-level calculations to determine the number of long-term unemployment in Oklahoma. The number of long-term unemployed individuals calculated for each county is divided by the total number of long-term unemployed individuals in the state determining the appropriate dollar amount each county is to receive.

Data Source: Data used to calculate Long-term Unemployment is sourced by the Bureau of Labor Statistics.

Unemployment Concentrations – 20%

Unemployment Concentrations, as a formula factor, is the number of unemployed individuals in each county with the number of unemployed individuals across the state, above the state's unemployment rate. The number of unemployed individuals in each county with an unemployment rate above the state's is divided by the total number of individuals calculating the appropriate dollar amount each county is to receive. Data Source: Data used to calculate Unemployment Concentrations is sourced by the Bureau of Labor Statistics, Local Area Unemployment Statistics.

Declining Industries – 15%

Declining Industries data shows consistent job loss, within industry clusters, in a geographic region. Oklahoma uses county-level data to calculate Declining Industries. The number of jobs lost in each county is divided by the total number of jobs lost across the state calculating the appropriate dollar amount each county is to receive. A county that experiences overall job growth, instead of loss, does not receive funding for this formula factor. Data Source: Data used to calculate Declining Industries is sourced by the Oklahoma Employment Security Commission.

Farmer/Rancher Economic Hardship – 20%

Farmer/Rancher Economic Hardship is an even split of two key agriculture economic indicators: Net Cash Farm Income and Hired Farm Labor. Oklahoma uses county-level data to calculate Farmer/Rancher Economic Hardship. Net Cash Farm Income, as a formula factor, is any negative change in income between the most current Census of Agriculture and the previous Census of Agriculture. The change in income for each county with a negative change is divided by the total negative change in the state to calculate the appropriate dollar amount each county is to receive. Hired Farm Labor, as a formula factor, is any negative change in the number of hired farm workers between the most current Census of Agriculture and the previous Census of Agriculture. The change in works in each county with a negative change is divided by the total negative change in the state to calculate the appropriate dollar amount each county is to receive. Data Source: Data used to calculate Farmer/Rancher Economic Hardship is sourced by the United States Department of Agriculture, Census of Agriculture.

Mass Layoff – 0%

Mass layoff data is no longer available through the Bureau of Labor Statistics and the state does not track or report on this information. Therefore, the final formula factor is weighted at zero (0) and no funding is distributed for Mass Layoff data.

To calculate the initial formula allocation for each area, the dollar amount calculated for each factor is summed by county and then by WDA. In the event the initial formula allocation determines an area is to receive less than 90% of the average percent share of the previous two year's percent share, the amount needed to increase said area(s) to the 90% minimum will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensures award amounts from year to year do not result in the often extreme fluctuations of unemployment, population, and poverty data.

Due to the differences and fluctuations in federal, state, and local economic and unemployment situations the Governor will, if necessary, adjust the formula no more than once per program year to ensure that dislocated worker funding is awarded based on the most relevant circumstance and data concerning the time for which the data is analyzed.

B. FOR TITLE II

I. DESCRIBE THE METHODS AND FACTORS THE ELIGIBLE AGENCY WILL USE TO DISTRIBUTE TITLE II FUNDS.

Oklahoma has grouped each of its 77 counties into four Local Workforce Development Boards. ODCTE staff will determine an allocation amount for each Oklahoma county within the Workforce Development Areas by using demographic data. This allocation for each county will include the number of eligible individuals within each county. This will include population, eligible individuals 18-24 years of age that do not have a high school diploma or its recognized equivalent, and eligible individuals 25+ years of age that do not have a high school diploma or its recognized equivalent. A formula will be determined using these variables to determine an allocation amount for each county. Applicants will select which counties they would like to serve. Eligible providers will compete for the allocation of their selected counties. Multiple providers may be granted an allocation within a specific county, and the allocation will be divided between those providers within that specific county. Multiple service providers may be selected within a county based on funding requested on dollars available.

Eligible providers will determine a budget for providing services in the counties requested and the ODCTE will evaluate these budgets. Negotiations will occur when more than one eligible provider is determined for a specific county.

Eligible provider means an organization that has demonstrated effectiveness in providing adult education and literacy activities. This may include the following:

- Local education agency;
- Community-based or faith-based organization;
- Volunteer literacy organization;
- Public housing authority;
- Institution of higher education;
- Public or private nonprofit organization;
- Library;
- Partnership between an employer and an entity previously described;
- Nonprofit institution that is not previously described and has the ability to provide adult education and literacy activities to eligible providers;
- Consortium or coalition of the agencies, organizations, institutions, libraries, or authorities previously described.

Awards may be based on multiple factors including reasonableness of the budget relative to the service area, quality of the eligible provider application, past performance including Measurable Skill Gain attainment relative to the state performance target, expected number of individuals to be served, workforce board recommendations, previous year allocation, past expenditures, and results from the pre-award risk assessment. The review panel will be comprised of both ODCTE and non-ODCTE individuals with expertise in areas related to adult education and family literacy. The review panel will review these factors and based on this information and allocation available for each Workforce Development Area. The ODCTE may decide to hold an additional grant competition for all or specific counties within the state based on the quality of the applications and to ensure equitable access of service offerings to eligible individuals. If there are unrequested portions of funds in a service area, the ODCTE may elect to redistribute those funds to other areas of need in the state. The ODCTE may also choose to reopen a competition for a specific unserved county. Priority will be given to those areas in the same region where the unrequested funds came from.

The amount received by eligible recipients will be held steady for two years. After this period, allocation amounts for eligible provider will be determined using a formula that accounts for the eligible individuals within a county, performance of the service provider, and provider need.

In January 2022, the Oklahoma Department of Career and Technology Education held a competition to award funds in a multi-year competition for Adult Education & Family Literacy grants, Integrated English and Literacy and Civics Education (IELCE) grants, and Correctional Education grants. ODCTE hosted separate grant competitions using three different RFP applications for each of those programs. Eligible agencies will have the option of applying for one or more of these grants; however, they are not required to apply for all of the competitions. The RFP applications were due February 15, 2022. Eligible agencies had the option to apply for one or more counties in the Adult Education & Family Literacy grants. For each competition, the same grant application and process will be used by all eligible applicants.

The ODCTE will fund Integrated English Literacy and Civics Education (IELCE) in conjunction with Integrated Education and Training (IET) activities. Components funded within this program are adult education and literacy activities, workforce preparation activities, and workforce training. An eligible recipient for either the IELCE or the Corrections Education grants do not have to be a recipient of the Adult Education & Literacy Education grant. Both IELCE and Corrections Education grants may or may not mirror that of the Adult Education & Literacy counties served.

The application will contain the local application criteria listed within Section 232 and the 13 considerations listed in Section 231(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy.

To demonstrate past effectiveness, eligible providers will provide performance data on its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, and English language acquisition. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

There are two ways in which an eligible provider may meet these requirements:

1. An eligible provider that has been funded under Title II of the Act must provide performance data required under Section 116 to demonstrate past effectiveness.
2. An eligible provider that has not been previously funded under Title II of the Act must provide performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals, including evidence of the following: Reading, Writing, Mathematics, and English language acquisition. Other subject areas relevant to the outcomes for participants including Employment, Attainment of secondary school diploma or its recognized equivalent, and Transition to postsecondary education and training.

The ODCTE will review each application to determine if the applicant has demonstrated effectiveness and will conduct a pre-award risk assessment for each eligible applicant. Local workforce development boards will review applications to determine alignment of the applications with their local plans and provide recommendations to the ODCTE. Applications will include criteria on how the eligible provider describes the steps to take to ensure equitable access to, and participation in, their federally assisted program for students, teachers, and other program beneficiaries with special needs. The criteria will include how the applicant proposes to prevent barriers from occurring that can impede equitable access or participation for: gender, race, national origin, color, disability, or age. (Section 427 of GEPA)

A rubric will be developed, and the evaluation criteria will include the 13 considerations in 231(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy, as well as other components deemed necessary to review the application.

The award cycle for all grants will be four years. Awards will be given for program years 2024-2025, and 2025-2026. The next grant competition will be held in January 2026. Priority will be given to programs offering IET activities.

II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS TO ALL ELIGIBLE PROVIDERS TO APPLY AND COMPETE FOR FUNDS AND HOW THE ELIGIBLE AGENCY WILL ENSURE THAT IT IS USING THE SAME GRANT OR CONTRACT ANNOUNCEMENT AND APPLICATION PROCEDURE FOR ALL ELIGIBLE PROVIDERS.

Eligible providers will apply for the Adult Education and Family Literacy Education grant, Integrated English Literacy & Civics Education (IELCE) grant, and Correctional Education grant through the Oklahoma Department of Career and Technology Education (ODCTE). ODCTE will ensure that all parties potentially interested in the grant shall have direct and equitable access to apply for one or more of the grants. Notification of the RFP will first occur on the ODCTE website. Core WIOA partners and one-stop partners will also be notified when the RFP is published on the website. The application will be available as a fillable document that can be downloaded from the ODCTE website. The completed application will be emailed to the ODCTE Adult Education & Family Literacy Division at abe@careertech.ok.gov. The ODCTE staff will notify the applicant within two business days that the ODCTE has received the application. Each applicant will complete the same application and submit their application through the same process. This will ensure direct and equitable access to all eligible providers.

Only applications determined to be complete and from an eligible provider of “demonstrated effectiveness” will be evaluated and scored by a review panel. The review panel will be comprised of both ODCTE and non-ODCTE individuals with expertise in areas related to adult

education and family literacy. A review panel will review and score each application using a rubric and consistent review procedures ensuring an equitable review process.

C. VOCATIONAL REHABILITATION PROGRAM

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

The Oklahoma Department of Rehabilitation Services (OKDRS) is the single Designated State Agency for these funds and is a combined agency, no distribution is required.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

I. DESCRIBE THE STATE'S PLANS TO MAKE THE MANAGEMENT INFORMATION SYSTEMS FOR THE CORE PROGRAMS INTEROPERABLE TO MAXIMIZE THE EFFICIENT EXCHANGE OF COMMON DATA ELEMENTS TO SUPPORT ASSESSMENT AND EVALUATION

Oklahoma is working to improve the interoperability of management information systems used by the WIOA core programs in order to support assessment, evaluation, and performance accountability, while maintaining appropriate program boundaries and compliance with federal and state privacy requirements. The State's approach emphasizes coordination, data governance, and consistent use of common data elements rather than the development of a single unified case management system.

These efforts are informed by the Workforce Transformation Task Force Report issued in April 2023, which identified key success factors for an effective and accountable workforce system. The principles outlined in that report guide the State's approach to data alignment and interoperability.

Guiding Principles for Data Interoperability

The State's plans to improve interoperability are grounded in the following principles:

- 1. Authority**

Clear administrative authority and defined roles support consistent data governance,

enable prioritization of system needs, and allow resources to be deployed to improve data quality and reporting.

2. Accountability

Performance-based reporting and monitoring rely on accurate, timely, and consistent data. Improving alignment of common data elements across core programs supports accountability at the state and local levels.

3. Coordination

Interoperability efforts focus on coordination among core program agencies to align definitions, reporting timelines, and data elements necessary for assessment and evaluation, rather than replacing existing program-specific systems.

4. Information

The State seeks to improve shared understanding and use of workforce data by identifying and aligning common data elements used for performance accountability, assessment, and reporting, while recognizing that data reside in multiple authorized systems.

5. Agility

Strengthening data alignment supports the State's ability to respond to emerging workforce trends, performance issues, and stakeholder needs using available data and analysis.

6. Durability

Interoperability efforts are designed to be sustainable over time, relying on established governance structures, documented processes, and interagency collaboration that remain effective across changes in leadership or administration.

Current Focus Areas

To support these principles, Oklahoma's current interoperability efforts include:

- identifying common data elements required for WIOA performance accountability;
- improving consistency in data definitions and reporting processes across core programs;
- coordinating appropriate use of wage record data through established data-sharing agreements; and
- strengthening data quality and validation processes to support assessment and evaluation.

These efforts support incremental progress toward more effective data exchange and analysis while ensuring compliance with statutory requirements and data privacy protections.

II. DESCRIBE THE STATE'S PLANS TO INTEGRATE DATA SYSTEMS TO FACILITATE STREAMLINED INTAKE AND SERVICE DELIVERY TO TRACK PARTICIPATION ACROSS ALL PROGRAMS INCLUDED IN THIS PLAN

Oklahoma is working toward improved coordination of intake, service delivery, and participant tracking across WIOA core programs and other programs included in this Plan, with the goal of

reducing duplication of services and strengthening coordinated service delivery. These efforts focus on aligning processes, improving data exchange where authorized, and supporting consistent tracking of participation across programs, rather than implementing a single, unified intake or case management system.

Core partner agencies are collaborating to increase data sharing in ways that are consistent with program statutes, confidentiality requirements, and applicable federal and state privacy laws. Existing data-sharing agreements and memoranda of understanding support the appropriate use of wage record data and other shared information necessary to meet WIOA performance accountability requirements and state performance indicators.

Recent efforts have focused on improving access to shared information needed for performance monitoring, assessment, and reporting. These efforts include development of tools and processes that allow authorized users to access selected data elements across partner systems for analytic and reporting purposes, while maintaining program-specific eligibility determinations, case management responsibilities, and fiscal accountability.

The WIOA core partners, with oversight from the Governor's Council for Workforce and Economic Development, continue to coordinate integration efforts related to intake alignment, performance tracking, and reporting. These efforts are supported by interagency collaboration and are being expanded to include coordination with the Oklahoma Workforce Commission as part of the State's broader workforce system modernization strategy.

III. EXPLAIN HOW THE STATE BOARD WILL ASSIST THE GOVERNOR IN ALIGNING TECHNOLOGY AND DATA SYSTEMS ACROSS REQUIRED ONE-STOP PARTNER PROGRAMS (INCLUDING DESIGN AND IMPLEMENTATION OF COMMON INTAKE, DATA COLLECTION, ETC.) AND HOW SUCH ALIGNMENT WILL IMPROVE SERVICE DELIVERY TO INDIVIDUALS, INCLUDING UNEMPLOYED INDIVIDUALS

Oklahoma is committed to advancing a coordinated, statewide approach to technology and data alignment across required one-stop partner programs. The State Board assists the Governor by supporting the development of a clear roadmap toward integrated participant and performance data systems that improve service delivery, reduce duplication, and strengthen outcomes for individuals, including unemployed individuals.

The long-term objective of this effort is to enable secure data sharing across core programs to support common intake, coordinated service planning, and consistent performance measurement. Aligning technology and data systems allows programs to better understand participant needs, track services across partners, and measure progress toward credential attainment and employment, making meaningful benchmarking and continuous improvement possible.

Technology modernization is a priority under the current administration. In recent years, the State Board has supported interagency collaboration among the Oklahoma State Regents for Higher Education, Oklahoma State Department of Education, Oklahoma Department of Career and Technology Education, Oklahoma Employment Security Commission, Oklahoma Department of Rehabilitation Services, and the Oklahoma Office of Management and Enterprise Services to assess opportunities for data connectivity across education, workforce, and economic development systems. Effective collection and use of shared data is essential to

reducing gaps between labor supply and demand and improving service coordination for individuals and employers.

The State Board also supports the Governor in leveraging statewide governance structures, including coordination with the Oklahoma Workforce Commission, to further align technology strategies, data standards, and system modernization efforts. Integrated information access capabilities have been developed to provide a platform for linking data across participating agencies, improving data collection, dissemination, and strategic decision-making in support of statewide workforce priorities.

Consistent with WIOA, the Governor may use existing formula funds to support data collection, analysis, and research projects at the state and local levels that advance system integration and performance accountability. The State Board assists by advising on priorities for these investments and ensuring alignment with statewide workforce goals.

To support these efforts, representatives from all WIOA core programs, including Title I, Adult Education, Vocational Rehabilitation, and Wagner-Peyser, have participated in cross-program workgroups facilitated by State Board staff. Through these workgroups, partner programs have:

- Exchanged information on common data elements that support assessment, service planning, and evaluation.
- Shared information on existing data systems and current performance reporting processes.
- Reviewed WIOA performance indicators, reporting requirements, and applicable regulations and guidance.

Through continued coordination, the State Board supports the Governor in advancing a more integrated, participant-centered workforce system. Improved alignment of technology and data systems strengthens the ability of one-stop partners to deliver seamless services, reduces administrative burden, improves data quality, and enhances outcomes for individuals seeking education, training, and employment.

IV. DESCRIBE THE STATE'S DATA SYSTEMS AND PROCEDURES TO PRODUCE THE REPORTS REQUIRED UNDER SECTION 116, PERFORMANCE ACCOUNTABILITY SYSTEM. (WIOA SECTION 116(D)(2)).

The State is working to re-establish a WIOA Data Group which will be affiliated with the newly formed Oklahoma Workforce Commission and in alignment with the GCWED and the Local Workforce Development Boards all working together with one (1) common goal: To ensure compliance of WIOA section 116 (D) (2) is maintained, processes are streamlined, and public “dashboard-style” metrics are agreed upon as we further refine “How do we know we’ve had a good day?”

OESC: OESC Title I and Title III programs utilize EmployOklahoma. EmployOklahoma provides a self-service labor exchange system that provides job matching and workplace information service for employers and job seekers. Job seekers can establish an account to manage their job search activities, register with labor exchange activities, and explore career pathways utilizing the O*NET system to deliver highly relevant and precise job and resume matches. Employers can establish an account to manage job openings and view job seeker resumes. Staff can create

and manage job orders on behalf of employers. EmployOklahoma provides a client management application that allows case managers to track their caseload and report information required under Labor Exchange, Re- Employment Services, WIOA, TAA (TRA Adjustment Act) and other federal programs. It provides the ability to manage eligibility, maintain program registration, maintain enrollment records, store required and relevant documentation, and provides staff with a standardized process for following participants through the workforce development system network. It fully supports all state and federal programs, grant, and reporting requirements. EmployOklahoma provides the integrated statewide Eligible Training Provider (ETP) list, allowing training providers and providers of youth services to create and manage self-service accounts, allows local area and state review processes of ETP eligibility requests, and provides federal program reporting requirements.

OCTAE: Adult Basic Education at the Oklahoma Career & Technical Education (OCTEA) currently utilizes LACES (Literacy, Adult, and Community Education System) by LiteracyPro Systems, a developer of data management systems for the public and nonprofit sectors. LACES is an online student data management software with the capability of generating daily reports. Engineered for providers of literacy, Adult Basic Education (ABE), and correctional education programs, LACES allows case managers to easily set baselines, track program progress and student goals, deliver results, and streamline data reporting to state and federal agencies. ODCTE anticipates quarterly reports to local WDBs to demonstrate performance for decision-making.

OKDRS: The Oklahoma Department of Rehabilitation Services (OKDRS) is utilizing the AWARE case management system by Alliance Enterprises. Alliance Enterprises, Inc. maintains the case management system used by more than 35 Vocational Rehabilitation state agencies throughout the country. In addition to serving as a tool for managing services for vocational rehabilitation programs under Title IV of the WIOA, it also produces reports to meet the reporting requirements of the U.S. Department of Education, Rehabilitation Services Administration.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The core workforce partners will utilize the WIOA Performance Measures for the Core Programs to monitor and improve all WIOA core programs. Lead State agencies assess the post-program success of participants exiting WIOA core programs using federally required WIOA performance measures. These measures are used to monitor outcomes related to participants' entry into employment, retention in employment, earnings, credential attainment, and progress in education and training.

Core workforce partners utilize the WIOA Performance Measures for the Core Programs to assess performance and support continuous improvement across the workforce development system. These measures include:

- Employment in the Second Quarter after Exit
- Employment in the Fourth Quarter after Exit

- Median Earnings
- Credential Attainment Rate (not applicable to all programs)
- Measurable Skill Gains
- Effectiveness in Serving Employers (not applicable to all programs)

Performance outcomes are analyzed by program and population, including Adults, Dislocated Workers, Youth, Adult Education, Wagner-Peyser, and Vocational Rehabilitation. State and local workforce boards use these performance measures to assess the progress and effectiveness of core partners within their respective service areas.

These performance indicators allow the state to evaluate the effectiveness of workforce services and to identify opportunities for continuous system improvement. The State also uses the Eligible Training Provider (ETP) system to monitor training completion and employment outcomes for participants receiving training services through the workforce system.

Through the ETP system, the State reviews education and training programs to determine whether participants are obtaining employment in the occupations for which they were trained. This review process supports both the workforce and education systems in assessing the effectiveness of training programs offered statewide. Programs eligible to receive workforce funding are reviewed on a bi-annual basis, and programs that do not meet state-established performance standards are subject to removal from eligibility.

C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

The state is currently working on MOUs with core partners as well as reviewing state statutes to allow for data sharing among core partners. Some agreements have been made while others are in process. Although agreements have not been made with all partners, Oklahoma has used UI wage records for many years for performance accountability and labor market information. Currently, wage records are used to calculate performance measures for Title I and Title III programs as prescribed in WIOA.

D. PRIVACY SAFEGUARDS

Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

The State of Oklahoma consolidated data and operational systems and provides a centralized CyberCommand Security Operations Center within the Office of Management and Enterprise Services Information Services (OMES IS) that protects workforce systems from cyber threats. Automated tools assist with protecting the network. OMES ensures that all workforce systems provide security authorization and user authentication. The data retention policies are required by the Oklahoma Records Management Act for agencies to identify and adopt a records retention schedule for the retention of documents and data following state and federal

mandates. Due to the nature of consolidated operations, the state adheres to the U.S. Department of Defense standards for data protection and end-of-life destruction.

The privacy requirements for the Family Educational Rights and Privacy Act (FERPA) outlined in section 444 of the General Education Provisions Act (20 U.S.C. 1232g) are enforced through role-based user operations that ensure separation of duties and data disclosure. The state mandates the local system staff must be compliant and must sign state confidentiality agreements following data security training. All data-sharing agreements and Memorandum of Understanding (MOU) documents are strictly enforced and utilized for all data sharing.

Aggregated data is used to ensure user privacy unless approved agreements allow for participant data that support workforce or education operational and reporting needs. To further protect personally identifiable information collected in WIOA, Unemployment Insurance (UI), and statewide reporting or operational systems including EmployOklahoma and ServiceLink, have implemented state-level security measures. These include limiting and logging physical access to database servers, 128-byte encryption, SSL, and individual password protection to guard against unauthorized access as mandated by state laws and guidelines enforced by OMES.

7. PRIORITY OF SERVICE FOR VETERANS.

A. DESCRIBE HOW THE STATE WILL IMPLEMENT THE PRIORITY OF SERVICE PROVISIONS FOR COVERED PERSONS IN ACCORDANCE WITH THE REQUIREMENTS OF THE JOBS FOR VETERANS ACT, CODIFIED AT SECTION 4215 OF 38 U.S.C., WHICH APPLIES TO ALL EMPLOYMENT AND TRAINING PROGRAMS FUNDED IN WHOLE OR IN PART BY THE DEPARTMENT OF LABOR.

B. DESCRIBE HOW THE STATE WILL MONITOR PRIORITY OF SERVICE PROVISIONS FOR VETERANS.

C. DESCRIBE THE TRIAGE AND REFERRAL PROCESS FOR ELIGIBLE VETERANS AND OTHER POPULATIONS DETERMINED ELIGIBLE TO RECEIVE SERVICES FROM THE JOBS FOR VETERANS STATE GRANTS (JVSG) PROGRAM'S DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALIST/CONSOLIDATED POSITION.

A. Implementation of Priority of Service

Oklahoma ensures priority of service for veterans and eligible spouses in accordance with the Jobs for Veterans Act, codified at 38 U.S.C. §4215, for all employment and training programs funded in whole or in part by the U.S. Department of Labor.

Veterans and other persons eligible for services under the Jobs for Veterans State Grants (JVSG) program are identified at multiple points of entry throughout Oklahoma's workforce development system. All workforce system partners and staff performing labor exchange or case management functions through the State's electronic workforce system are required to provide priority of service to covered persons.

Disabled Veterans' Outreach Program (DVOP) specialists provide individualized career services to eligible veterans who have a Significant Barrier to Employment (SBE), with emphasis on serving veterans who are economically or educationally disadvantaged. Veterans with SBEs may include, but are not limited to, homeless veterans and vocational rehabilitation clients.

Priority of service for veterans and eligible spouses is implemented statewide in accordance with TEGL 10-09; TEGL 19-16, Change 1; and Oklahoma's Adult and Dislocated Worker Policy, WSD 80-2024.

B. Monitoring of Priority of Service

The State monitors compliance with priority of service requirements through system reporting, staff training, and field monitoring activities. Data from the State's workforce information system is reviewed to ensure veterans and eligible spouses receive appropriate priority in service delivery.

Local Workforce Development Boards (LWDBs) are required, pursuant to WSD 80-2024, to ensure that priority of service for veterans is applied consistently across all service delivery points operated by subrecipients and partners. LWDBs must maintain local policies and procedures addressing priority of service and are responsible for monitoring local operations to ensure compliance with federal and state requirements.

C. Triage and Referral for JVSG-Eligible Veterans

Veterans are screened for eligibility and potential SBEs during registration and assessment using a State-provided military registration checklist. Veterans determined to have an SBE are referred to a DVOP specialist for individualized career services.

If a DVOP specialist is not available, eligible veterans are immediately referred to other workforce center staff for appropriate services. American Job Centers are required to maintain a documented flowchart that describes the process for serving veteran customers, including identification of SBEs and referral to DVOP services when applicable.

Workforce Center staff identify SBEs during registration in the State's labor exchange and case management system to ensure timely referral and service coordination.

Assurances and Coordination

The State assures that veterans and other individuals eligible for JVSG-funded services will receive employment and training activities authorized under section 134 of the Workforce Innovation and Opportunity Act and Chapters 41 and 42 of Title 38, United States Code. The State complies with Priority of Service requirements established under the Jobs for Veterans Act (Public Law 107-288).

The State maintains a memorandum of understanding with the Veterans' Employment and Training Service (VETS) to ensure services are delivered in accordance with Title 38, U.S.C.; 20 CFR Part 1001; applicable TEGLs; and Veterans' Program Letters (VPLs).

Coordination with Partners and Employers

Oklahoma continues to coordinate services for veterans through cross-agency collaboration and employer engagement. A special interagency committee, OKMilitaryConnection, was established to support coordination among workforce, education, veterans' services, and military partners, including planning employment and outreach activities for transitioning service members and their families.

The State also works with employer councils, chambers of commerce, trade associations, education and training providers, and workforce partners to connect veterans and eligible spouses to training and employment opportunities. Efforts to support credit for military experience and fast-track credentialing through technology centers, community colleges, and four-year institutions continue, with coordination involving the Oklahoma Workforce Commission and the Governor's Council for Workforce and Economic Development.

8. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WITH DISABILITIES

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

Access for All Initiative

The Access for All initiative within Oklahoma Works places a focus on recruitment, hiring, and promotion of individuals with disabilities in the state of Oklahoma's workforce. Access for All focuses on the Oklahoma Works system partners as well as employers in the state. This initiative provides training, consulting, and resources to ensure that individuals with disabilities are intentionally included in efforts to achieve greater household wealth for Oklahomans.

Access for All equips Oklahoma's Workforce System with knowledge and resources to make it more accessible to individuals with disabilities that utilize one-stop system programs in person, on the phone, or through the web. The Star Accessibility Framework was implemented that operationalizes the Access for All system strategy by providing an assessment tool for the continuous improvement of the workforce system in the areas of customer service, training, outreach, and physical accessibility. The Star Accessibility Framework Rubric is designed to be a tool in support of continuous improvement at American Job Centers and system efforts including but not limited to center certification and strategic planning. In Phase I of implementation of the Star Accessibility Framework, local workforce development areas conducted an initial assessment of centers

Oklahoma Works center staff routinely refer individuals with disabilities to the DSA for more intensive training and job placement opportunities.

DSA has six certified Social Security Administration (SSA) Work Incentive Counselors working and rotating between the Workforce Centers and DSA offices. Staff collaborate to assist job seekers receiving SSA benefits, specifically when referred by center staff. A DSA Benefits Planner will explain the importance of working at the highest possible level and above SSA's Substantial Gainful Activity benchmark. Jobseekers are provided with general information concerning the impact of work on SSA disability benefits. Upon applying for VR services, these individuals would then also receive detailed reports illustrating the impact of work on other benefits and services the individual may be receiving, such as TANF, SNAP, UI compensation, Veteran's benefits, etc. DSA Benefits Planners address concerns of individuals with disabilities

about the possibility of losing benefits and help them understand and maximize their work incentives.

Business and Employer Outreach Oklahoma's Workforce System recognize opportunities to reach Oklahoma's businesses and employers with a powerful message of Access for All. Through old and new relationships, DSA and OKABT lead the workforce partners in working to arrange and deliver training to businesses and employers that will reduce their hesitation to hire job seekers with disabilities and to identify ways to educate about the benefits of directly recruiting and hiring job seekers with disabilities.

DSA utilizes its ADA Coordinator as a resource to provide consultation, technical assistance, and site reviews to identify accessibility issues to all workforce system partners and other agencies, entities, and businesses and employers. These services are available to advance the promotion of equal access for individuals with disabilities in programs, services, and buildings statewide.

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE ENGLISH LANGUAGE LEARNERS

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

OESC complies with Section 188 of the Workforce Innovation and Opportunity Act of 2014 (WIOA) [29 CFR 38]. National origin discrimination includes Limited English Proficient individuals under 29 CFR Section 38.9 and specifically states that in providing any aid, benefit, service, or training under a WIOA Title I-financially assisted program or activity, a recipient must not, directly or through contractual, licensing, or other arrangements, discriminate on the basis of national origin, including LEP which includes English Language Learners (ELL).

These requirements apply to all one-stop center operators and required one-stop delivery system partners. Operators and partners are responsible for ensuring that LEP and English language learner customers have meaningful access to programs, services, and activities offered through the one-stop delivery system, consistent with section 188 of WIOA and 29 CFR Part 38.

Additionally, 29 CFR Section 38.41 added "LEP and preferred language" to the list of categories of information that each recipient must record about each applicant, registrant, eligible applicant/registrant, participant, and terminee.

It is the policy of the State to provide services and information in a language other than English for customers with Limited English Proficiency (LEP) to effectively inform or enable those customers to participate in departmental programs or activities. Limited English Language Proficiency Policy (WSD 32-2024) requires LWDBs to take reasonable steps to ensure that LEP individuals have meaningful access to their programs and activities. Reasonable steps (29 CFR Section 38.9(b)(1)) may include, but are not limited to, the following:

- Assessing an LEP individual to determine their language assistance needs.
- To LEP individuals, provide oral interpretation or written translation of both hard-copy and electronic materials in the appropriate non-English languages.

- Conducting outreach to LEP communities to improve service delivery in needed languages.

LWDBs must ensure that these services are provided free of charge and in a timely manner. LEP individuals must be given adequate notice of the availability of interpretation and translation services. For LEP individuals entering an Oklahoma Works American Job Center, language assistance services must be timely and provided in a manner that ensures equal access and avoids delay or denial of aid, benefits, services, or training.

When an LWDB determines that a significant proportion of the population eligible to be served is likely to be directly affected by a program or activity requiring information in a single language other than English, the LWDB must translate written vital program materials into that language and provide effective oral interpretation services. The State may also provide oral interpretation for LEP individuals who are not part of a significant group to ensure meaningful access. When an interpreter for a needed language cannot be located, Language Line Solutions (1-866-874-3972) is used to provide interpretation services. Language assistance services are also provided to individuals, accessing virtual services through the one-stop delivery system.

For LEP individuals needing to file unemployment insurance claims in Spanish or Vietnamese, the Oklahoma Employment Security Commission's Interactive Voice Response (IVR) system provides a full range of self-service options, including filing an initial claim and obtaining information on existing claims. For LEP individuals requiring assistance in other languages, OESC maintains a full-service contract with Language Associates Inc. Interpreter services through Language Associates are also available for employers and have been used during Employer Council meetings.

LWDBs must not require an LEP individual to provide their own interpreter and must not rely on a minor child or adult family member or friend to interpret or facilitate communication, except in limited circumstances permitted under 29 CFR Section 38.9, including emergency situations, minimal information exchanges, or when an LEP individual specifically requests an accompanying adult and agrees to that assistance. When an LWDB permits an accompanying adult to interpret, documentation of the individual's decision must be maintained.

Where precise, complete, and accurate interpretation or translation is required for adjudicatory or legal purposes, LWDBs may provide an independent interpreter even if the LEP individual prefers to use their own interpreter, particularly when interpreter competency cannot be established, consistent with 29 CFR Section 38.9(f).

LWDBs must also include a Babel Notice indicating that language assistance is available in all communications containing vital information, whether in hard-copy or electronic format, consistent with 29 CFR Section 38.9(g). OESC provides technical assistance to LWDBs regarding Babel Notice requirements through TA-02-2019.

English language learners are informed of their right to access, enroll, and co-enroll in all WIOA core programs for which they are eligible through translated materials, interpretation services, and direct assistance from one-stop staff. Information on available programs, eligibility requirements, and referral options is provided in a language and manner that ensures meaningful access and informed participation.

IV. COORDINATION WITH STATE PLAN PROGRAMS

DESCRIBE THE METHODS USED FOR JOINT PLANNING AND COORDINATION AMONG THE CORE PROGRAMS, AND WITH THE REQUIRED ONE-STOP PARTNER PROGRAMS AND OTHER PROGRAMS AND ACTIVITIES INCLUDED IN THE UNIFIED OR COMBINED STATE PLAN.

Oklahoma uses structured joint planning and ongoing coordination among core programs, required one-stop partner programs, and other programs included in the Combined State Plan to ensure an integrated, responsive, and accountable workforce system.

On August 10, 2023, Executive Order 2023-21 was filed with the Oklahoma Secretary of State, transferring responsibility and authority for administering WIOA Title I program to the Oklahoma Employment Security Commission. The Executive Order emphasizes the State's commitment to maximizing economic effectiveness, improving efficiency, and maintaining Oklahoma's competitiveness, while delivering a coordinated workforce system that enables job seekers to access career opportunities and employers to secure needed talent.

OESC has long served as a central partner within Oklahoma's workforce system and continues to strengthen collaboration with workforce stakeholders, including the Governor's Council for Workforce and Economic Development, the Oklahoma Department of Career and Technology Education, the Oklahoma Department of Rehabilitation Services, Local Workforce Development Boards, and other required and optional partners. These entities work jointly to address the priorities identified through the Workforce Transformation Taskforce and to support development and implementation of this Combined State Plan.

Joint planning and coordination among State Plan programs are advanced through statewide policy alignment, shared performance priorities, and structured partner engagement. Examples of coordinated statewide efforts include:

- **Data-informed planning and accountability**, including shared use of performance data to inform policy decisions, monitor progress, and evaluate outcomes across programs.
- **Systemwide coordination and barrier resolution**, with oversight, policy alignment, and system improvement functions carried out through the Governor's Council and its committee structure, supported by interagency collaboration among core and partner programs.
- **Accessibility and inclusion initiatives**, including Oklahoma's Access for All Initiative, led by the Oklahoma Department of Rehabilitation Services. This initiative promotes equitable access to workforce services for individuals with disabilities and supports compliance with the Americans with Disabilities Act (ADA) across the Oklahoma Works system. Through training, consultation, and technical assistance, delivered in partnership with Oklahoma ABLE Tech, Access for All strengthens accessibility for job seekers by accessing services in person, by phone, or online, and supports employers in recruiting, hiring, and retaining individuals with disabilities.
- **Youth engagement and development strategies**, including coordinated efforts to support youth participation in education and training leading to credentials, degrees, and employment in high-demand sectors. Oklahoma continues to monitor youth workforce trends and implement dropout prevention strategies for youth ages 14–21, as

well as re-engagement and recovery strategies for disconnected youth ages 16–24, in collaboration with education, workforce, and community partners.

Through these joint planning and coordination mechanisms, Oklahoma ensures that core programs and partner activities are aligned, complementary, and focused on shared outcomes. This coordinated approach strengthens service delivery, reduces duplication, and supports a comprehensive workforce system responsive to the needs of individuals, employers, and communities statewide.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the	Yes

The State Plan must include	Include
general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant	Yes

The State Plan must include	Include
Barriers to Employment (SBE) to DVOP services, when appropriate; and	
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

A. IDENTIFY THE REGIONS AND THE LOCAL WORKFORCE DEVELOPMENT AREAS DESIGNATED IN THE STATE

Oklahoma's four Local Workforce Development Boards comprise the service delivery component of the State's public workforce system. Local Workforce Development Boards:

1. Link Oklahomans with workforce services and resources to develop the talent of the State's workforce.
2. Serve as connectors to Oklahoma Works and American Job Centers that deliver services to job seekers and employers.
3. Develop regional and local strategic plans and establish funding priorities.
4. Facilitate partnerships among employers with shared workforce and training needs; and
5. Use labor market information to guide workforce strategies that focus resources on high-growth industries.

Local Workforce Development Boards are business-led, with more than 50 percent private-sector representation. Boards also include representatives from community colleges and other education and training providers, elected officials, and workforce program partners to ensure that employer skill needs are effectively communicated to the education and training system.

Federally Recognized Planning Regions and Local Workforce Development Areas

The regions and local workforce development areas described below reflect the federally recognized designation structure in effect at the time of this State Plan submission.

CENTRAL PLANNING REGION

The Central Planning Region comprises one (1) Local Workforce Development Area:

- **Central Oklahoma Workforce Innovation Board (COWIB)**

Counties: Canadian, Cleveland, Hughes, Lincoln, Logan, Okfuskee, Oklahoma, Pottawatomie, and Seminole.

NORTHEAST PLANNING REGION (GREEN COUNTRY REGION)

The Northeast Planning Region comprises one (1) Local Workforce Development Area:

- **Green Country Workforce Development Board**

The Green Country Workforce Development Board resulted from the legal merger of the former Northeast Oklahoma Workforce Development Board and Green Country Workforce Development Board, which were located within the same planning region. This merger was completed in accordance with State policy and WIOA requirements and did not require a federal waiver.

Counties: Adair, Cherokee, Craig, Creek, Delaware, Mayes, McIntosh, Muskogee, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Rogers, Sequoyah, Tulsa, Wagoner, and Washington.

SOUTHEAST PLANNING REGION

The Southeast Planning Region comprises one (1) Local Workforce Development Area:

- **Southern Workforce Board**

Counties: Atoka, Bryan, Carter, Choctaw, Coal, Garvin, Haskell, Johnston, Latimer, Le Flore, Love, Marshall, McCurtain, Murray, Pittsburg, Pontotoc, and Pushmataha.

WESTERN PLANNING REGION

The Western Planning Region comprises two (2) Local Workforce Development Areas as federally recognized at the time of this State Plan submission:

- **Western Oklahoma Workforce Development Board**
- **South Central Workforce Investment Board**

Counties: Alfalfa, Beaver, Beckham, Blaine, Caddo, Comanche, Cimarron, Cotton, Custer, Dewey, Ellis, Garfield, Grady, Grant, Greer, Harmon, Harper, Jackson, Jefferson, Kay, Kingfisher, Kiowa, Major, McClain, Noble, Payne, Roger Mills, Stephens, Texas, Tillman, Washita, Woods, and Woodward.

Operational Alignment and Designation Status

Local Workforce Development Boards have initiated operational alignment of administrative and service-delivery functions to reduce administrative costs and increase resources available for participant services.

Specifically, the Central Oklahoma Workforce Innovation Board and the Western Oklahoma Workforce Development Board have begun operating under a single, combined local administrative and service-delivery structure. This operational alignment includes shared

For purposes of WIOA Section 106, this operational alignment does not yet constitute a federally recognized local workforce development area designation. At the time of this State Plan submission:

- Consultation with Chief Elected Officials and Local Workforce Development Boards regarding local workforce development area designation has occurred over multiple years through formal and informal mechanisms, including statewide meetings, structured engagement with local leadership, and discussions facilitated through the Governor's Council for Workforce and Economic Development and the Oklahoma Workforce Commission. These consultations addressed governance alignment, administrative capacity, service delivery effectiveness, and system accountability. Following sustained consultation efforts and the absence of statewide consensus on local-area restructuring, the Governor has formally announced his intent to designate Oklahoma as a single statewide local workforce development area pursuant to his authority under WIOA Section 106 and has issued written notice to Chief Local Elected Officials initiating formal designation consultation consistent with statutory requirements.

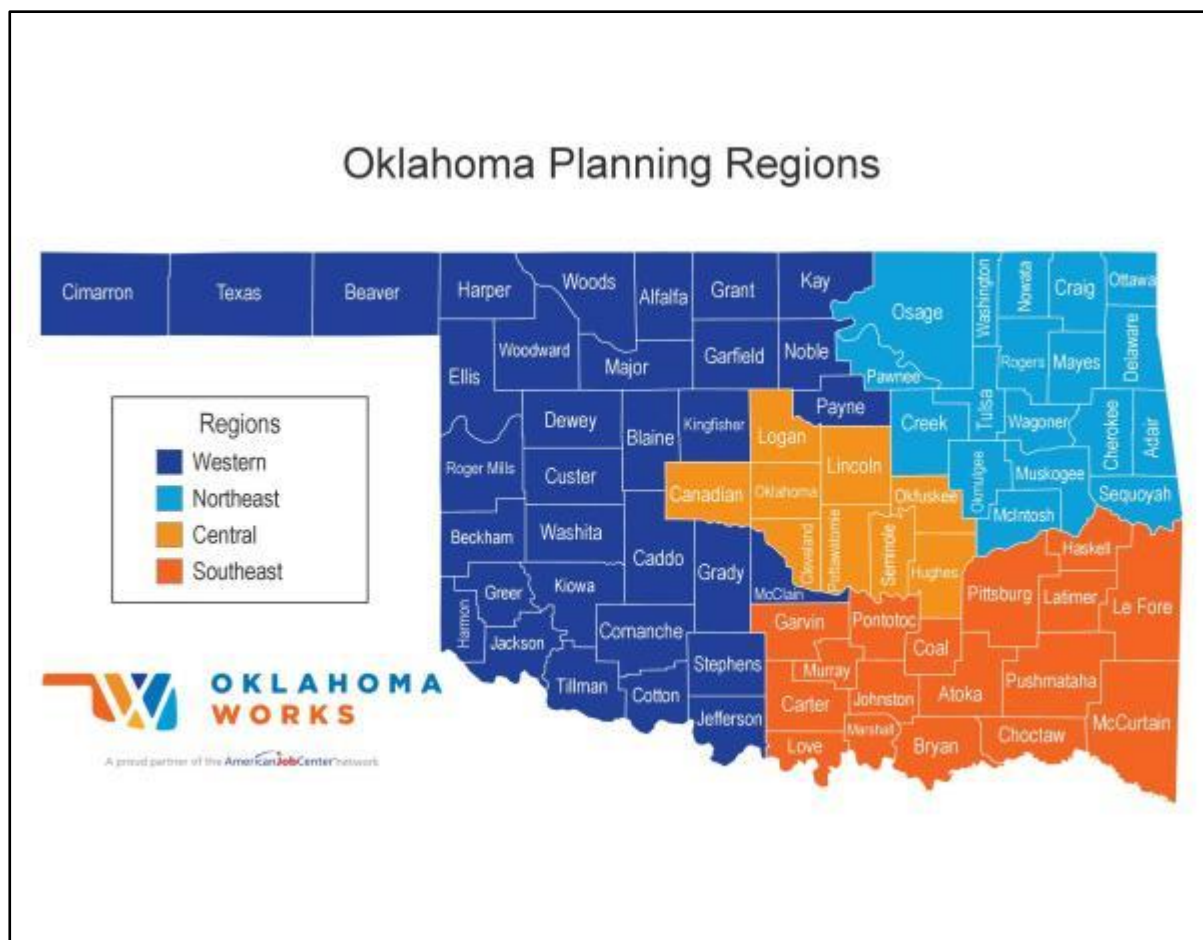
Areas

- Central
- South Central
- Southern
- Green Country

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Current Operational Planning Regions

B. DESCRIBE THE PROCESS AND POLICY USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR “PERFORMED SUCCESSFULLY” AND “SUSTAINED FISCAL INTEGRITY” IN ACCORDANCE WITH 106(B)(2) AND (3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN IDENTIFYING THE REGIONS

Oklahoma designates local workforce development areas in accordance with Section 106 of the Workforce Innovation and Opportunity Act and implementing federal regulations. The State’s designation, redesignation, and conditional designation processes are governed by formal state policies, including Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Workforce Development Board (WSD-13-2024) and Process for Local Workforce Development Area Conditional Designation (WSD-65-2024).

Planning Regions and Regional Planning

Oklahoma currently operates four planning regions, Central, Northeast, Western, and Southeast. These planning regions were established through a consultative process that included statewide public meetings and input from core partner agencies, Local Workforce Development Boards, and Chief Elected Officials. As described in the section below, Oklahoma is proposing a

transition to a single statewide local workforce development area, which would modify the current regional structure if approved. Planning regions were identified based on:

- natural labor market areas;
- commuting patterns and employment flows;
- population and demographic characteristics;
- regional asset mapping and economic conditions; and
- alignment with other state regional frameworks, including Oklahoma Department of Commerce Economic Development Areas and Oklahoma Health Care Authority regions.

Consultation with Local Boards and Chief Elected Officials

The State consults with Local Workforce Development Boards and Chief Elected Officials throughout the designation and regional planning processes. Consultation occurs through public meetings, formal comment opportunities, and structured engagement with local leadership to ensure that regional configurations reflect labor market realities, administrative capacity, and service delivery considerations.

Local Area Designation and Redesignation

The Governor's Council for Workforce and Economic Development reviews and recommends designation, redesignation, and conditional designation of local workforce development areas. The Oklahoma Employment Security Commission, as the administrative entity for WIOA Title I, supports these processes through policy administration, technical review, and documentation.

Initial designation, redesignation, consolidation, or creation of a new local workforce development area requires:

- submission of a formal request by the affected Local Elected Officials;
- review of the request against statutory and policy criteria; and
- consideration by the Governor's Council during a public meeting or through established Council processes.

These procedures are detailed in state policy and ensure transparency, consistency, and compliance with WIOA requirements.

Criteria for "Performed Successfully" and "Sustained Fiscal Integrity"

In accordance with WIOA Sections 106(b)(2) and (3), Oklahoma evaluates whether a local area has performed successfully and sustained fiscal integrity when considering designation or redesignation.

State policy defines "performed successfully" as a local area achieving at least 80 percent of its negotiated local performance levels for each applicable performance indicator for the two most recently completed program years, consistent with WIOA Section 116.

"Sustained fiscal integrity" is defined as a local area having no:

- final determination findings from audits, evaluations, or reviews identifying fiscal integrity violations or mis-expended funds due to willful disregard or failure to comply with WIOA requirements;
- findings of gross negligence, defined as a conscious and voluntary disregard of reasonable administrative standards; or
- failure to observe accepted standards of administration.

Local areas must also demonstrate:

- compliance with 2 CFR Part 200 and applicable Department of Labor regulations;
- timely submission of required financial and participant reports;
- timely completion of annual audits; and
- no placement on cash hold status for more than 30 days during the relevant review period.

These standards align with WIOA Section 106(e)(2) and applicable federal guidance.

Additional Assurances for Redesignation or Consolidation

State policy further requires assurances that any newly designated or redesigned local area will:

- comply with applicable uniform cost principles and procurement standards;
- maintain complete and auditable financial and program records;
- adhere to nondiscrimination requirements under WIOA Section 188;
- comply with priority of service requirements for veterans and other statutorily prioritized populations;
- meet audit and reporting requirements under 2 CFR Part 200 Subpart F; and
- fulfill regional planning requirements if located within a planning region, consistent with WIOA Section 106(c)(1).

Consultation Status

Consultation with Chief Elected Officials and Local Workforce Development Boards regarding local workforce development area designation has occurred over multiple years through formal and informal mechanisms, including statewide meetings, structured engagement with local leadership, and ongoing discussion through the Governor's Council for Workforce and Economic Development and the Oklahoma Workforce Commission.

These consultations addressed governance alignment, service delivery effectiveness, administrative capacity, and system accountability.

Following sustained consultation efforts regarding governance alignment, the Governor has formally announced his intent to designate Oklahoma as a single statewide local workforce development area pursuant to his authority under WIOA Section 106. Written notice has been issued to Chief Local Elected Officials initiating formal designation consultation process.

Public comment opportunities are provided through the WIOA State Plan modification process, and final designation actions will occur consistent with statutory notice, consultation, and transparency requirements under WIOA and applicable state policy.

Oklahoma's transition to a single statewide local workforce development area is intended to strengthen statewide coordination and administrative efficiency while maintaining regional service delivery capacity. Workforce services will continue to be delivered through existing workforce centers, partner facilities, and affiliated service locations across the state, ensuring continued access for job seekers and employers while statewide governance alignment is implemented.

C. PROVIDE THE APPEALS PROCESS AND POLICY REFERRED TO IN SECTION 106(B)(5) OF WIOA RELATING TO DESIGNATION OF LOCAL AREAS

Oklahoma's policies governing the designation of local workforce development areas are articulated in the Local Area Initial Designation Process policy (WSD-11-2024). That policy includes an appeals process that references the Governor's Council for Workforce and Economic Development's Workforce System Oversight Committee (WSOC) as the entity to receive and hear appeals of designation decisions.

Although the policy language names WSOC, this committee is no longer operational. In practice, appeals of designation determinations, including requests for a hearing, are coordinated by the Oklahoma Employment Security Commission (OESC) with support from the Executive Committee of the Governor's Council for Workforce and Economic Development. This reflects current governance arrangements and ensures that appeal hearings and recommendations are conducted by the appropriate leadership entity.

Under current practice:

- A local area that wishes to appeal a denial of initial designation or redesignation must submit a written appeal to OESC within 20 calendar days following denial.
- OESC coordinates the logistics of the appeal and facilitates scheduling with the Executive Committee of the Governor's Council for Workforce and Economic Development.
- The Executive Committee conducts or oversees the appeal hearing in accordance with the policy's procedural parameters and issues a written recommendation.
- The Governor retains final decision-making authority over local area designation.
- If a local area disagrees with the Governor's decision, a second-level appeal may be submitted to the U.S. Department of Labor in accordance with WIOA Section 106(b)(5) within 14 days with a copy provided to the Dallas ETA Regional Administrator.

This approach reflects the State's current governance structure and ensures appeal rights are preserved even as policy language is updated.

D. PROVIDE THE APPEALS PROCESS AND POLICY REFERRED TO IN SECTION 121(H)(2)(E) OF WIOA RELATING TO DETERMINATIONS FOR INFRASTRUCTURE FUNDING

The appeals process relating to WIOA determinations for infrastructure funding is outlined in WSD 37-2024 (MOU/IFA Guidance). One-Stop partners have the right to file an appeal of the

Governor's determination regarding the one-stop partner's portion of funds to be provided for one-stop infrastructure costs under the State Funding Mechanism (SFM). The appeal process related to the SFM is a modified version of the complaint and grievance procedures found in WSD 31-2024 (Grievance and Complaint Process).

Within 5 business days from the notification of contributions under the SFM, appeals may be sent by email to deanna.smith@oesc.ok.gov, or mail to: Oklahoma Employment Security Commission P.O. Box 52003 Oklahoma City, OK 73152-2003

An opportunity for an informal resolution and a hearing to be completed within 60 days of the filing of the appeal. The Contents of the Appeal must contain a clear and concise statement of the facts describing the appeal. The statement of facts should include enough information to allow the entity to determine whether provisions of WIOA, the WIOA regulations, grant or other agreements under WIOA believed to have been violated; The remedy sought by the complainant.

Informal resolution: An attempt must first be made to informally resolve the complaint to the satisfaction of all parties. Informal resolution must be completed within 10 business days from the date the complaint was filed. If all parties are satisfied, the complaint is considered resolved and a letter outlining the funding agreement is attached to the appeal and sent to the parties.

Hearing: Any party dissatisfied with the determination from the informal resolution or no determination is made, any party may request a hearing for the appeal in writing within 2 business days from the close of the 10-day informal resolution period. The request for a hearing must be filed in writing to deanna.smith@oesc.ok.gov or to: Oklahoma Employment Security Commission PO Box 52003 Oklahoma City, OK 73152-2003.

Upon receipt of the request for a State hearing, the Executive Director of OESC or his/her designee shall review the appeal and provide an opportunity for a hearing. The Executive Director of OESC or his/her designee shall notify the complainant and the respondent within 10 business days of receipt of the hearing request.

Hearing Procedure: In any hearing conducted pursuant to a SFM appeal, all parties shall be afforded an opportunity for a hearing with the Appellate Panel after reasonable notice. Such notice shall include: 1) The date, time, and place of the hearing, in writing at least 10 business days prior to the date of hearing; 2) The original appeal filed and documentation of informal resolution attempts; 3) Relevant sections of WIOA or any other federal regulations involved; 4) If not in the original filed appeal, a statement of the foundation for the appeal. The statement must accurately reflect the content of the appeal as submitted by the complainant. However, clarifying notes may be added to ensure the appeal is addressed accurately; and 5) The right of the parties to be represented by an attorney or another designated representative (at their own expense).

The hearing is conducted in an informal manner in front of the Appellate Panel with strict rules of evidence not being applicable. Both parties have the right to present written and/or oral testimony and arguments; the right to call and question witnesses; the right to request and examine records and documents relevant to the issues; and the right to be represented. All evidence and a list of witnesses must be made available in advance to all parties five (5) business days prior to the hearing. Prior to the hearing, the Chair of the Appellate Panel will

inform the parties, in writing, of the hearing process (i.e., order of arguments, rebuttals, time restrictions, etc.). The hearing will be recorded electronically.

The hearing process will be completed within 60 days from the date the appeal/request for hearing was received by OESC.

Composition of Appellate Panel: The Appellate Panel will consist of three (3) members who are appointed by the Executive Director of OESC, along with two (2) alternates. Where feasible, the Panel may include a representative from the Governor's Council for Workforce and Economic Development, a State Agency partner, and a Local Area Staff member of any of the WIOA Core Programs. Alternates may be any combination chosen from any of the above entities, including OESC staff or hired entities. The Chief Executive Officer of OESC or his/her designee will oversee the hearing.

Final Decision by Appellate Panel: Unless precluded by law, informal disposition or resolution may be made of any individual proceeding by stipulation, agreed settlement, consent order, or default.

If informal disposition or resolution is not achieved, the Appellate Panel shall, within 60 calendar days from the date the complaint was filed, mail electronically and via the United States Postal Service, a written decision to both parties. The decision shall contain the following information: 1) The names of the parties involved; 2) A statement of the SFM appeal and issues related to the appeal; 3) A statement of the facts; 4) The State Appellate Panel's decision and the reasons for the decision; and 4) A statement of the action, if any, to be taken. The determination by the Appellate Panel for the SFM is considered final.

2. STATEWIDE ACTIVITIES

A. PROVIDE STATE POLICIES OR GUIDANCE FOR THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM AND FOR USE OF STATE FUNDS FOR WORKFORCE INVESTMENT ACTIVITIES

The Oklahoma Employment Security Commission (OESC) oversees the administration of the Workforce Innovation and Opportunity Act (WIOA) Title I programs. As administrator, OESC issues policy guidance through its series of Workforce System Directives (WSDs) and formal memos that are posted online on the Oklahoma Works website at <https://oklahoma.gov/workforce/about/policies.html>.

State funds are used to support Oklahoma Works, which is the umbrella entity for both workforce and education coordination. In addition, the funds are used to augment funds at the local level to provide incentives for performance and for statewide activities that might be identified by the Governor.

The Workforce Innovation and Opportunity Act provides opportunities for use of funds to support integrated workforce activities across the state. Oklahoma will follow all applicable Federal regulations and guidance pertaining to the use of each individual funding source while allowing limited amount of funding for statewide initiatives at the discretion of the Governor.

Funding will be primarily used in the support and development of strong regional sector strategies. Also, planning regions that share administrative costs will allow more resources to be prioritized toward training individuals for the state's most in-demand occupations.

System governance policies and guidance are collaboratively developed under the leadership of the Governor's Council for Workforce and Economic Development, with support from the Oklahoma Employment Security Commission (OESC). The Executive Committee of the Governor's Council fulfills the system-level coordination and oversight functions for statewide policy alignment. Core and required partners work collaboratively to develop policy for the state system. Additional partners and workforce system stakeholders are consulted through a task force model and can provide feedback to policy drafts based on areas of subject matter expertise. When released, all policies are located on the Oklahoma Works website.

The Governor's set-aside funding is used to lead efforts in expanding and enhancing the state's workforce system. These efforts include access to data, sponsoring events to bridge the gaps existing between education and business & industry. While spending occurs at the state level the impact of the use of the set-aside funding spreads across the state, reaching regions and local areas. Examples of this impact, as funded with the Governor's set-aside funding include:

Monitoring & Technical Assistance: In addition to the required monitoring for WIOA Title I programs, the Governor's set aside funds additional technical assistance for financial, programmatic and strategic operations. These efforts continue to be a priority for the state.

Non-formula Local Area Awards: The State uses a portion of the Governor's set aside funds to provide various awards to Local Workforce Development Areas. These awards include but are not limited to discretionary awards for system improvements as prioritized and outlined in WIOA; performance incentive awards; and programmatic pilot efforts as allowable with WIOA and federal regulations.

Software & Systems: Set aside funding is used to purchase licenses to, and maintain, various software and systems. These systems allow the state to provide an extensive case management and labor exchange system, increase accessibility to data, operate electronic grants management processes, increase the accessibility of state resources to local areas and system partners, and improve the effectiveness and efficiencies of state administration. Examples of these systems, as funded by the Governor's set aside, include but are not limited to: America's Joblink Alliance via contract with the Oklahoma Employment Security Commission, OKGrants via contract with Agate Software, and others.

Sponsorships: Set aside funding used to sponsor events throughout the state is used only for events that encourage collaboration and partnerships between business & industry, education and the WIOA system partners. One outstanding example is the Oklahoma Education and Industry Partnership initiative. This initiative strives to bridge the gap between the needs of the private sector and education. The closer we can bring all the partners, the further each generation of workforce will be able to carry Oklahoma's economy. The Oklahoma Works Partners Conference is another yearly sponsorship that brings individuals with a variety of positions from the partners together for education, professional development and collaboration.

Subject matter experts, including representatives from different federal agencies, are present to offer their expertise, improving the knowledge of the individuals working to serve Oklahoma's population.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING FOR MANDATORY AND DISCRETIONARY ACTIVITIES, INCLUDING HOW THE STATE WILL CONDUCT EVALUATIONS OF TITLE I ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES.

The State will use Governor's set-aside funds for required and allowable statewide activities consistent with WIOA to support system alignment, performance accountability, and continuous improvement of Title I Adult, Dislocated Worker, and Youth programs.

Carry Out the Three-Year Workforce Strategy

Governor's set-aside funds will support implementation of the Three-Year Workforce Strategy outlined in *The Transformation Report*, which describes development of a comprehensive strategic plan coordinated with the Oklahoma Workforce Commission, updated annually, and shared with policymakers. This strategy is centered on two complementary aims: (1) identifying and producing the workforce needed to meet employer demand and support economic growth, and (2) creating pathways and opportunities that enable individuals served by the workforce system to achieve long-term success.

The comprehensive strategic plan includes analysis of workforce needs, performance targets aligned to short-term and long-term outcomes, and strategies for leveraging public and private resources to support measurable results. Annual updates document progress, identify barriers, highlight best practices, and inform adjustments to statewide workforce priorities.

Illustrative activities supported through this strategy may include establishing quarterly workforce goals, surveying key industry sectors, convening workforce stakeholders to align data and resources, establishing key performance indicators and dashboards, identifying short-term investment priorities and longer-term targets, aligning education and training curricula to workforce needs, supporting innovation grants, and aligning workforce and economic development strategies.

Conduct Research and Evaluation

Governor's set-aside funds will be used to support research, analysis, and evaluation activities that inform statewide workforce strategy and assess the effectiveness of Title I Adult, Dislocated Worker, and Youth programs. Building on prior statewide workforce assessments, the State will continue to engage system partners to evaluate labor market needs, service alignment, and program outcomes.

These efforts support evaluation of program effectiveness, equity of access, and return on investment using WIOA performance measures and other allowable data sources. Findings from research and evaluation activities will inform policy development, investment decisions, and continuous improvement of statewide workforce programs.

Administer the State Eligible Training Provider List

The State will use set-aside funds to administer and maintain the Eligible Training Provider List (ETPL), including dissemination of provider information, technical assistance to local ETPL officers, and capacity-building efforts to expand access to quality training opportunities for WIOA participants. These activities support alignment of training investments with credentials of value and labor market demand.

Employer Engagement and Business Outreach

Governor's set-aside funds may be used to support employer engagement and business outreach activities, including state-led convenings and discovery sessions with core partners.

These efforts focus on identifying duplicative activities, improving coordination, and developing service roadmaps to support braided funding and aligned service delivery. Employer focus groups and engagement activities help inform workforce priorities and future employment needs.

Support Regional Planning and Innovative Service Delivery

The State may use discretionary set-aside funds to support regional planning and innovative service delivery projects, including industry and sector partnerships, performance incentive awards, and pilot initiatives consistent with WIOA and federal regulations. These activities support system improvement and testing promising practices.

Provide Sponsorships

Set-aside funds may be used to sponsor workforce-related events that promote collaboration among business, education, and workforce partners. One example is the Oklahoma Works Partners Conference, which provides professional development, knowledge sharing, and coordination opportunities for workforce system stakeholders statewide.

Improve Access to and Sharing of Data

Governor's set-aside funds will support efforts to improve access to, quality of, and use of workforce data. These efforts include strengthening data sharing among partners, coordinating research investments, and expanding dashboards and modern technologies to support data-informed decision-making and aligned outcomes across the workforce system.

C. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS.

The Oklahoma Employment Security Commission assumes responsibility for all statewide Rapid Response efforts. These activities are provided as part of a comprehensive workforce investment system designed to respond quickly when a layoff and/or plant closure appears imminent. Staff members at the Oklahoma Employment Security Commission (OESC), local WDBs, Oklahoma Department of Career and Technology Education (ODCTE), Rehabilitation Services and other system partners respond quickly to employer, employee and community needs when layoffs and/or plant closures occur. The objective of the Rapid Response team is to help workers transition from notification of layoff to re-employment as soon as possible.

Oklahoma maintains a database of WARN layoffs and plant closings. This database captures the number and job titles of workers laid off, the reason for layoff, presence of a labor union, and tracks the services provided to the employers and affected workers. This information is available to the public at www.employoklahoma.gov consistent with confidentiality requirements. When the layoff or closure involves organized labor, Rapid Response works closely with organized labor representatives in conducting Rapid Response activities.

The vast majority of companies in Oklahoma do not fall under the WARN Act provisions, so most are not statutorily required to file a WARN notification. Notices of impending layoffs received from these employers are informal in nature. These may include telephone calls from local elected officials, local workforce area service providers, economic development professionals,

the employer, news media, social media, or the affected workers themselves. The workers affected in this situation are also offered Rapid Response services.

Once a notification of a layoff happens, a telephone call or personal visit is made to the company to gather information about the layoff, explain Rapid Response services and processes, and set up employee meetings. The remainder of the Rapid Response team (including the partners listed previously) is then notified. The team makes every effort to work with the employer to set up meetings during the affected workers' shifts so workers can continue to be paid while learning about the various services available.

This often results in Rapid Response meetings held during early morning hours, on weekends, and late in the evenings. If it is not possible to conduct Rapid Response meetings on company time, then the workers are notified by announcement at the workplace and/or through the news media of the time and place for the meetings.

To expand the state's ability to respond quickly and provide services directly to affected workers, Oklahoma also utilizes mobile workforce response units. These mobile units allow Rapid Response teams to deliver workforce services, including job search assistance, unemployment insurance guidance, and enrollment in Oklahoma Works programs, directly at layoff sites and community locations. Mobile response units support timely service delivery, particularly in rural areas or in situations where large numbers of workers are affected and immediate access to workforce services is critical.

A team of workforce professionals and other service providers present information to affected workers at all Rapid Response meetings. Affected workers receive a 40-page handbook - Tools and Resources for Transitioning to Your Next Job. The handbook includes information about services and resources to help them get through the layoff and move to new employment as quickly as possible, including: programs and assistance available at their local Oklahoma Works American Job Center, tips for job searches, including resume development and interviewing skills, community services like consumer credit counseling, healthcare, and childcare, access to helpful websites, and physical locations of local Oklahoma Works American Job Centers.

During the meetings, workers are told which documentation they will need to register for Oklahoma Works and Unemployment Insurance programs/benefits, and they are given an approximate timetable on how quickly services can be provided. In many cases, job fairs are scheduled and held for the affected workers on the day of the Rapid Response meeting. All materials are available in both English and Spanish. Each presenter receives a handout reminding them of effective presentation techniques for the meeting. Records are kept on all rapid response events, including sign-in sheets, number of employees in attendance, an initial inventory of each employee's needs, and a satisfaction survey related to the meeting. Rapid Response events are consistently rated at 3.6 out of a possible 4.

Because receipt of a WARN notice is not sufficient, in most cases, for helping avert a layoff, proactive layoff aversion strategies are needed. Oklahoma has several strategies in place, including:

- Incumbent Worker Training to help avert layoffs.
- Oklahoma Works Rapid Response staff monitor news feeds, maintain relationships with business and industry across the state, and touch base with workforce teams and

economic developers at the local level for information related to Oklahoma companies that may be in distress. When companies are identified, contact is made with the company and/or local economic development officials to offer support and needed services.

- Local Workforce Development Boards (LWDBs) have strong relationships with local economic development staff and the companies in their area. These relationships sometimes allow the LWDB to become aware of challenges a company is experiencing and provides an opportunity to offer layoff aversion assistance.
- Oklahoma Employment Security Commission (OESC)- Local Oklahoma Works Centers often hear about companies in their area that may be struggling. Working with local and/or state economic developers allows for proactive efforts to avert potential layoffs.
- Oklahoma Department of Commerce - Rural Development Specialists (RDSs) live and work in their assigned areas across the state. They call on companies, provide resource referrals as needed, and build relationships with the companies. When companies experience difficulties, they often turn to the RDSs, who bring in a variety of resources to help solve problems. The Commerce Research Team provides research services for companies as needed. For example, a company in rural Oklahoma was having supply chain issues. The Commerce research team pulled together information and resources to help the company find additional/alternative supply chain resources. Without that assistance, layoffs may have been necessary. Proactive communications and call trips to corporate headquarters of Oklahoma companies, often by the Governor, help Oklahoma know of any issues corporate offices see at the local level. Issues can then be addressed effectively.
- Oklahoma's Career and Technology Education system (Career Tech) consists of 29 technology center districts with 59 campuses that provide technical, management, safety, and process improvement training for incumbent workers in Oklahoma companies. Career Tech also provides startup training when qualifying companies that are expanding and hiring new employees for that expansion.

Layoff Aversion/Business Retention and Expansion is ultimately about keeping existing businesses strong and growing. Oklahoma's workforce system strives to ensure we have the business relationships necessary to understand employer needs, to be aware of challenges they are experiencing, and be able to assist them in getting to the resources they need to succeed. This includes the assurance of access to a talent pipeline that has the skills and credentials demanded by employers.

D. DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES.

The state will provide Rapid Response services to areas that have natural disasters affecting the ability to be employed and receive income. The intent will be to provide assistance to employees until they are able to work again, and their employer is able to provide a place of employment. This will be accomplished by coordinated efforts of core partners, emergency management partners, charitable service providers and business services providers.

The Rapid Response Coordinator will discuss with the Oklahoma Employment Security Commission Area Manager, the Local Workforce Development Board Director, and the local and state emergency management agencies what services are required and what businesses are impacted. The group will also discuss whether a National Emergency Grant is needed. If required, the group will also provide the Governor's office with necessary information.

OESC will track and identify needs, notify the Business Services representatives at Local Workforce Development Boards. The Business Services representative will contact the affected business to determine the types and scale of needs. Frequently the business site may not be available, so the local Business Services representative will need to secure a meeting place. The Business Services representative will coordinate with partners to provide services as needed by the employees.

This should include:

- Oklahoma Employment Security Commission Area Manager or their designated representative
- The local One-stop operator
- Unemployment Insurance Department of OESC or their designated representative
- Oklahoma Department of Insurance
- Local and State Emergency Management Agencies

If needed this will also include:

- Veteran Services Department of OESC
- Tribal Governments
- Federal Emergency Management Agency (FEMA)
- Oklahoma Department of Rehabilitation Services
- Local charitable service providers like Red Cross, Salvation Army, etc.

Information and reports will be provided to concerned partners to assist employers getting back up and operating as soon as possible.

- FEMA
- Oklahoma Department of Commerce
- Local Economic Development groups
- Small Business Development Centers (SBDCs)

E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED.

(SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING

OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION AND HOW THE STATE WILL ENSURE THE PROVISION OF APPROPRIATE CAREER SERVICE TO WORKERS IN THE GROUPS IDENTIFIED IN THE PETITION (TAA SEC. 221(A)(2)(A)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

The Trade Adjustment Assistance (TAA) program began a phased termination on July 1, 2022. As of that date, no new TAA petitions have been certified. Workers who were separated from employment on or before June 30, 2022, under a previously certified petition may still be eligible for certain TAA benefits. These individuals were notified of potential eligibility at the time of layoff, and local office staff have been advised to direct all TAA-related inquiries to the State office to provide additional guidance.

While no new petitions are being certified, petitions can still be filed. In the event of reauthorization of the program, USDOL will review and issue determinations on petitions currently being held; the state will implement the program as directed by the U.S. Department of Labor. Unless otherwise directed by USDOL, OESC will follow the procedures outlined below.

If there is an existing petition, a pending petition or if it is suspected that a petition needs to be filed prior to a layoff, the Trade Adjustment Assistance (TAA) representative or their designee from the Oklahoma Employment Security Commission will attend the Rapid Response event explaining the benefits and services TAA will provide. The other departments and partners will still enroll the individuals for the appropriate other programs since a petition may take weeks to approve or may not be approved. While the benefits of TAA may be greater, the time limits of TAA may be shorter than some other benefits offered.

Upon certification of a TAA petition, the state TRA Coordinator obtains a list of affected workers from the layoff employer and issues a TAA eligibility letter to each worker. The letter directs the worker to the nearest Workforce office, where they will be advised of TAA benefits and services.

If a petition is approved after the original Rapid Response event, and TAA was not fully discussed in the original Rapid Response, the Business Services representative shall host an additional Rapid Response event centered on TAA and its benefit. In all cases if the petition is approved several weeks after the original Rapid Response event, another one should be held.

When the Rapid Response occurs after the layoff, efforts will be made to contact the employees through the company, through social media, public media, and at Oklahoma Works locations. The Rapid Response meeting will be held at a suitable location like Career Tech or some other public space.

The TAA Coordinator, the State Rapid Response Coordinator, and the Local Business Services representatives will keep each other up to date on their activities.

The TAA Coordinator and the Rapid Response Coordinator will ensure that all Local Business Services representatives fully understand TAA so they can spot companies that need a petition filed.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

IF THE STATE IS UTILIZING WORK-BASED TRAINING MODELS (E.G. ON-THE-JOB TRAINING, INCUMBENT WORKER TRAINING, TRANSITIONAL JOBS, AND CUSTOMIZED TRAINING) AS PART OF ITS TRAINING STRATEGY AND THESE STRATEGIES ARE NOT ALREADY DISCUSSED IN OTHER SECTIONS OF THE PLAN, DESCRIBE THE STATE'S STRATEGIES FOR HOW THESE MODELS ENSURE HIGH QUALITY TRAINING FOR BOTH THE PARTICIPANT AND THE EMPLOYER.

Through Oklahoma's American Job Centers, the core partners and other workforce partner entities develop, offer, and deliver quality business services that assist businesses and industry sectors in overcoming the challenges of recruiting, retaining, and developing talent for the regional economy. These services are facilitated through the local workforce development boards (LWDBs). Upon implementation of the state's single-area designation, these functions will be carried out at the statewide level by the Governor's Council for Workforce and Economic Development, which will assume the responsibilities of the local workforce development board consistent with WIOA. Each LWDB's local plan includes a description of the strategies and services used to:

- Facilitate engagement of employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations;
- Support a local workforce development system that meets the needs of businesses in the local areas;
- Coordinate workforce development programs and economic development; and
- Strengthen connections between the one-stop delivery system and unemployment insurance programs.

Local plans also describe strategies and services that are used in the local area to implement initiatives such as incumbent worker training, on-the-job training programs, customized training programs, industry and sector strategies, career pathway initiatives, utilization of effective business intermediaries, and other business services and strategies.

These work-based training models are designed to ensure high-quality training for both participants and employers by aligning training activities with clearly defined occupational competencies, documented training plans, and employer commitments to skill development, supervision, and retention.

Oklahoma prioritizes diversifying and expanding work-based learning opportunities as a vital component of strengthening career pathways, increasing credential attainment, and closing the skills gap. To do this, OESC's partner agencies collaborate to implement the policies and v necessary to support work-based learning strategies like Registered Apprenticeships, on-the-job training (OJT), work experience, and job shadowing.

LWDBs are tasked with identifying and vetting employers who can provide quality work experience to assist individuals with barriers in obtaining unsubsidized employment while ensuring there is no displacement of current employees and that WIOA funds will not be utilized to fill openings resulting from labor disputes. These safeguards help maintain training quality, protect workers, and preserve the integrity of the local labor market.

Local boards develop strategies to utilize transitional jobs (a type of work experience) as a gateway to unsubsidized employment for individuals who are chronically unemployed or have inconsistent work history, such as formerly incarcerated individuals, low-income individuals who must meet employment or training requirements to receive Supplemental Nutrition Assistance Program (SNAP) benefits, out-of-school youth, veterans, and other individuals with barriers to employment. Transitional jobs are structured with defined timeframes, skill-development expectations, and benchmarks for progression toward permanent unsubsidized employment.

Oklahoma allows for the stacking of work-based training. One such example is when a work experience or transitional job participant is hired for an on-the-job training position that results in full time unsubsidized employment with the OJT employer. Hiring an individual in an OJT continues to be a successful strategy for delivering training services through the adult and dislocated worker funding streams, allowing businesses to provide specific job training to new employees in a normal work environment. OJT agreements include defined training periods, employer reimbursement tied to skill attainment, and expectations for successful completion and retention following training.

Incumbent Worker Training (IWT) is utilized to increase the competitiveness of employers by developing a highly skilled workforce that will result in increased financial viability, stability, competitiveness, and productivity for the employer/business. To avert the risk of a business closing, IWT may be developed with a business or business association to maintain their competitive status, incorporate new technology, or prevent downsizing. Process improvements that contribute to the competitiveness and productivity of a business are allowed as a component of IWT, when combined with training that results in new skills attainment for incumbent workers. The competitiveness of workers participating in IWT is increased by enhancing existing skills, learning new skills, and earning employer or industry-recognized credentials, aligned with in demand occupations, in addition to retaining employment, maintaining their careers, and/or increasing their earnings potential. An ideal Incumbent Worker Training project allows the opportunity for employers to promote incumbent workers with increased skill levels, which creates backfill opportunities for other WIOA participants, such as less skilled or underemployed employees within the company, or for other individuals seeking employment.

2. REGISTERED APPRENTICESHIP

DESCRIBE HOW THE STATE WILL INCORPORATE REGISTERED APPRENTICESHIP INTO ITS STRATEGY FOR SERVICE DESIGN AND DELIVERY (E.G., OUTREACH TO SPONSORS AND PROSPECTIVE SPONSORS, IDENTIFYING POTENTIAL PARTICIPANTS AND CONNECTING THEM TO APPRENTICESHIP OPPORTUNITIES).

Registered Apprenticeship (RA) enables Oklahoma to prioritize education and training resources to support placement into high demand occupations through hands-on training and

technical instruction while helping employers build the skilled workforce their businesses need to succeed. Registered Apprenticeship is integrated into the State's overall workforce service design as a preferred earn-and-learn model that aligns education, training, and employment outcomes for both jobseekers and employers.

Oklahoma has developed apprenticeship outreach and communications plans to increase public awareness, conducted engagement activities with industry partners, and initiated collaborations with several businesses to explore innovative work-based learning solutions. This includes the creation of an Oklahoma Work-Based Learning Guide to explain the benefits and procedures to register apprenticeships and work-based learning programs. These outreach efforts are coordinated with workforce system partners and American Job Centers to ensure consistent messaging, streamlined referrals, and increased access to apprenticeship opportunities statewide.

Using U.S Department of Labor grant funds, apprenticeship program officers will focus on creating and expanding RA opportunities within the industries that demonstrate a need for skilled workers and a high potential for growth. These industries were identified using data from the Oklahoma Works Ecosystem Gap Analysis report published in February 2017, the Oklahoma's Talent Pipeline Report published by Oklahoma Works in May 2019, and data from Emsi Labor Market Analytics and Dun & Bradstreet Econovue to identify industry sectors for outreach. Staff reviewed the skills gap, occupational growth rate, the percentage of workers who are 55+ to total jobs, and the potential for opportunities for special populations based on licensing requirements and safety regulations.

The ten (10) industry sectors staff are targeting program registration include: Finance, IT, Public Service/Government, Retail, Childcare, Food Service, Public Utilities, Alternative Energy, Aerospace, and Health Care.

These data-driven targeting strategies ensure Registered Apprenticeship programs are aligned with current and projected labor market demand and provide high-quality training opportunities with strong employment outcomes.

Strategies for expansion and diversification also include outreach to specific underserved populations such as women, individuals with disabilities, formerly incarcerated individuals, minorities, veterans, and out of school youth. OESC staff are developing collaborative partnerships with the Oklahoma Department of Rehabilitative Services, the State Department of Veterans Affairs, the Oklahoma State Regents for Higher Education, Tribal Career Services, the Oklahoma Department of Career and Technical Education, and non-profit organizations to develop Registered Apprenticeship Programs targeted to non-traditional and underserved populations.

These partnerships support participant identification, referral, and co-enrollment strategies that connect individuals to Registered Apprenticeship opportunities while providing access to supportive services as needed.

Youth Apprenticeship Expansion

Youth apprenticeship is a strategy for building a more inclusive economy by creating affordable, reliable, and equitable pathways from high school to good careers and college degrees. It allows students to complete high school, start their postsecondary education at little to no cost, get

paid work experience alongside a mentor, and embark on a path that broadens their options for the future. Youth apprenticeship programs equip young people with post-secondary credentials, credits, and degrees, and the work experience, mentorship, and networks they need to thrive in a rapidly changing economy.

For employers, youth apprenticeships are a cost-effective talent strategy, as apprentices build skills to meet evolving business needs and contribute to their employers' bottom line.

Youth apprenticeship programs are coordinated with education and workforce partners to ensure alignment with career pathways, credential attainment, and seamless transition into postsecondary education, Registered Apprenticeship, or unsubsidized employment.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

PROVIDE THE PROCEDURE, ELIGIBILITY CRITERIA, AND INFORMATION REQUIREMENTS FOR DETERMINING TRAINING PROVIDER INITIAL AND CONTINUED ELIGIBILITY, INCLUDING REGISTERED APPRENTICESHIP PROGRAMS (WIOA SECTION 122).

Oklahoma's eligible training provider list (ETPL) is designed to maximize customer choice and ensure all priority groups under WIOA are served. The ETPL is administered in a manner to ensure significant numbers of competent providers offering a wide variety of training programs and occupational choices are available to customers. Oklahoma's ETPL is disseminated electronically through EmployOklahoma.

Oklahoma's process for determining eligible training providers and programs for adults, dislocated workers, and out-of-school youth aged 16-24 includes identifying training providers whose performance qualifies them to receive WIOA training funds through Individual Training Accounts (ITAs). An eligible training provider (ETP) is the only type of entity that may receive funding for training services through an ITA.

The following types of entities may qualify as ETPs:

- 1) Institutions of higher education that provide programs leading to recognized postsecondary credentials;
- 2) Registered Apprenticeship program sponsors, per 50 Stat. 664, chapter 6631 29 U.S.C. 50 et seq.; and
- 3) Other public or private providers of programs of training services, which may include joint labor-management organizations and eligible providers of adult education and literacy activities under Title II when combined with occupational skills training.

Local workforce development board (LWDBs) and/or service providers assist individuals in the selection of training programs that are directly linked to employment opportunities in their local area. Each local board must establish, maintain, review and update annually a list of existing or emerging occupations determined to be in-demand based on labor market information, sector strategies, and economic growth priorities.

This process ensures that ETPL programs are aligned with high-demand occupations and that training investments support quality outcomes for both participants and employers.

On-the-job training, internships, paid or unpaid work experience, and transitional employment are not required to be listed on the ETPL.

Eligible Training Provider List Procedure

Training providers must apply for inclusion on the statewide ETPL through EmployOklahoma. By creating an account in EmployOklahoma training providers may enter and edit information about their training institutions and the programs they offer. Once a provider is approved by the State, local workforce development boards review submitted programs and recommend approval based on local demand and compliance with state policy.

An ETP must ensure their ability to provide training programs that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities. Assurances must be signed by each ETP that it and all of the provider's employees responsible for providing training services will comply fully with all nondiscrimination and equal opportunity provisions of the laws, including WIOA Section 188, Title IV of The Civil Rights Act of 1964, Section 504 of The Rehabilitation Act of 1973, which prohibits discrimination against qualified individuals with disabilities, The Americans with Disabilities Act (ADA) of 1990, The Age Discrimination Act of 1975, Title IX of The Education Amendments of 1972, and The Oklahoma Act Against Discrimination. If the training provider does not check YES to all assurances above, they will not be able to complete the application for inclusion on the ETPL.

Except for Registered Apprenticeship programs, providers must comply with WIOA Section 122 performance and reporting requirements. Registered Apprenticeship programs are exempt from performance reporting requirements and are automatically included on the ETPL upon verification of registration with the U.S. Department of Labor, Office of Apprenticeship.

Automatic inclusion of Registered Apprenticeship programs ensures timely customer access to high-quality earn-and-learn training opportunities and supports streamlined service delivery across the workplace.

Initial Eligibility

New training providers may seek initial eligibility electronically through EmployOklahoma. Approved providers will remain eligible and listed on the ETPL for only 1 year for a particular program. After the first year, if the provider/program meets subsequent approval requirements, continued eligibility will be reviewed every two years. The criteria and information requirements established by OESC require a provider and/or program to provide verifiable information pertaining to:

- 1) A detailed description of each program of training to be offered, including the cost of training;
- 2) Program-specific performance related to the indicators of performance;
- 3) A description of the provider's partnership with at least one business, if such partnership exist;
- 4) Other factors that indicate high-quality training services, such as accreditation, registration and /or state licensing requirements specific to the industry, and whether the training leads to a recognized postsecondary credential; and
- 5) Information addressing the alignment of the training services with in-demand industry sectors and occupations, to the extent practicable, as evidenced by the Occupational Information Network Standard Occupation Classification (O*NET-SOC) code(s) and a Classification of Instructional Programs (CIP) code. An exception to the program

specific performance requirement will be made for new programs that the ETP has never provided before.

ETPs are able to upload documentation to EmployOklahoma. The number of private vocational schools that have uploaded documentation pertaining to approval, licensing or registration from their oversight organization or agency continues to increase as new training facilities are added to the ETPL. This process helps to ensure quality training providers and programs for individuals seeking training. State Institutions of Higher Education are not required to upload proof of accreditation but are required to list their accrediting agency in the initial application.

Continued (Subsequent) Eligibility

The following factors must be considered by Local Workforce Development Boards (LWDBs) when electronically recommending subsequent eligibility approval to the State:

- 1) The specific economic, geographic, and demographic factors in the workforce areas in which providers seeking eligibility are located;
- 2) The characteristics of the population served by providers seeking eligibility, including the demonstrated difficulties in serving such populations, where applicable;
- 3) The degree to which training programs relate to in-demand industry sectors and occupations within the state;
- 4) The performance of a provider of program(s) of training services as outlined by OESC;
- 5) The program cost of training services; and
- 6) The involvement of employers in the establishment of skill requirements for the training program.

Each training program must meet subsequent approval requirements after the initial year of eligibility. Continued eligibility will then be reviewed every two years. In the previous State Plan, it was stated that the program-specific performance required for continued eligibility) included the number participated, number completed, number employed after leaving the program, credentials attained, and median and average earnings pertaining to the All-Student population. With the change of WIOA performance indicators for continued eligibility now requiring the number employed in the second and fourth Quarters after exit, median earnings, and credential attainment, OESC is exploring setting new benchmarks for subsequent approval. Performance is still required to be entered biennially, at a minimum, by the training provider (or by their oversight agency through a data exchange process) for each training program. Local workforce boards cannot require training providers to update information more frequently than once per year, provided the information is accurately submitted.

All Student and WIOA performance data will be captured through EmployOklahoma and reported to ETA via the Workforce Integration Performance System (WIPS). Additional factors that may be considered by local workforce boards prior to the electronic submission of training programs to the State for subsequent approval, include:

- Specific economic, geographic and demographic factors in the workforce area in which the providers seeking eligibility are located;
- Characteristics of the population served by providers seeking eligibility, including the demonstrated difficulties in serving such populations;

- The degree to which training programs relate to in-demand industry sectors and occupations within the state;
- The performance of the provider's training programs;
- The program's cost of training;
- The involvement of employers in the establishment of skills requirements for the training program; and
- The impact provider performance will have on State-negotiated WIOA performance measures for all program participants.

Continued eligibility is based on information, reported by the ETP, for the All-Student population of each program of training service (program of study) on the ETPL. The All-Student data is reviewed by the local area for a local determination, and then by the state for approval.

Information reported to state agencies on federal and state training programs other than WIOA Title I-B programs: the Oklahoma Employment Security Commission (OESC) reports all required ETP wage data. This data does not include the names or other personally identifying information.

MOUs have been signed with the Oklahoma State Regents for Higher Education (OSRHE) and the Oklahoma Department of Career and Technology Education (ODCTE) for the provision of performance data from Oklahoma colleges and technology centers, respectively, based on their All Student populations. When the process is in place with Launchpad, data will be "dropped" into the state's system, allowing for a more accurate reporting of performance, as well as protecting the personally identifying information of students.

Timeliness and accuracy of ETP's performance reports: An Eligibility Expiration Notification is automatically generated to ETPs for each approved training program 30 days and 15 days prior to the date their continued eligibility renewal is due. ETPL coordinators also receive notification of when program performance is due to be updated. A list of Eligibility Expiration Notifications is found on the local ETPL Coordinators Approval Menu page. Local coordinators are encouraged to contact the ETP within the 30 and 15-day period as a courtesy reminder and to prevent removal of programs from the ETPL. The state considers failure of the training provider to accurately update program performance within 60 days a substantial violation of the requirement to submit timely information for continued performance. Exceptional circumstances beyond the ETP's control, such as natural disasters, unexpected personnel transitions, and unexpected technology-related issues will be taken into consideration, however. Providers who substantially violate the requirement to timely and accurately submit all required information will be removed from the ETPL.

Access to training services throughout the state (including rural areas and through technology use): Oklahoma's eligible training provider lists includes programs of study that are offered onsite, online, or a combination of the two. This is especially important due to the rural nature of the state. Oklahoma is fortunate to have 25 public colleges and universities offering instruction at 49 campuses throughout the state, as well as 29 technology center districts operating on 58 campuses. In addition, private vocational training facilities are located in several counties. Out-of-state providers and programs are also included on the ETPL, including

online programs and brick and mortar facilities located in bordering states. The latter may be closer for individuals opting for onsite training that is closer than programs in neighboring counties. It is also important to note that many ETPs offer onsite training during daytime hours, evening hours, and weekends.

An ETP's ability to offer industry recognized certifications and credentials: Providers are required to enter the name(s) of the entity (or entities) that authorizes, approves, licenses, and/or accredits their school and their programs. ETPL approval is not granted unless this information is entered. OSRHE, ODCTE, and the Oklahoma Board of Private Vocational Schools each have requirements for ensuring their training programs result in industry-recognized certifications and credentials. Eligible training and education providers strategize with the state and local workforce development areas on how to be more job-driven and meet the needs of employers. Using the state's strategies, OESC collaborates with the state's educational leaders and partners to create accessible training programs that meet the needs of our WIOA eligible individuals and provide them with meaningful training, including training that results in industry-recognized certifications and credentials.

Oklahoma continues to explore solutions to lessen the annual reporting burden on ETPs and on the local workforce boards, through the MOUs and by exploring the effect of reducing the initial eligibility requirements from the seven indicators of performance that currently require entries in EmployOklahoma. As stated earlier, the state is in the process of re-evaluating the current performance benchmarks for ETPL eligibility, including continued eligibility requirements. Oklahoma is considering program completion rate and the credential attainment rate as the indicators of program performance used for ETPL eligibility determinations and, with the aid of the State entities responsible for oversight of the training providers including ODCTE, OSRHE and the Oklahoma Board of Private Vocational Schools (OBPVS) with input from the local workforce development boards, will determine a reasonable increase in the levels of each performance benchmark. This is intended to ensure quality training providers and programs on the ETPL, as well as better performance outcomes. Once the mechanism for collecting All-Student performance information is in place, AJLA will provide the information to populate the annual performance report to DOL.

Until there is an established process for capturing the performance of WIOA-only participants in the approved training programs, OESC will require the local areas to develop a process for tracking and entering the data into EmployOklahoma.

The current performance benchmarks for eligible training programs, except for Registered Apprenticeships, are based on the All-Student population: 1) Number of students who completed training - 40%; 2) Entered Employment Rate, defined as the percentage of training program participants who are in unsubsidized employment in the 2nd quarter after exit from the program - 20%; 3) Employment Retention Rate: The percentage of training program participants who are in unsubsidized employment in the 4th quarter after exit -20%; 4) Number of students that attained credentials - 50%; 5) Median Earnings: The median earnings of training program participants who are in unsubsidized employment during the second quarter after exit- minimum wage or based on local policy requirements, whichever is higher; 6) Average Earnings in the 2nd quarter after exit; and 7) Average Earnings in the 4th quarter after exit.

Conditions For Removal

The State may remove a program or programs from the ETPL for failing to meet the established criteria or for not providing all required performance information for subsequent eligibility. Removal is also appropriate if the program has failed to attain or has lost the accreditation required for professional licensure. A training provider that is removed from the list for reasons stated above may reapply for continued eligibility when they can demonstrate that they meet all requirements. Any providers that willfully supply false performance information, misrepresent costs or services, misrepresents their financial stability relating to the ability to provide training services, or violate requirements of WIOA law, including the provisions addressed in the Assurances section of the ETPL application regarding nondiscrimination, will be removed from the ETPL by the State for a period of not less than two years. Providers are liable to repay all adult, dislocated worker, and youth funds received during the period of non-compliance. No training provider debarred by the Federal Government may be permitted to be placed or remain on the ETPL. In the case of a training provider or a program of training services that is removed from the list while WIOA participants are enrolled, the participants may complete the program unless the provider or program has lost state licensing, certification, or authorization to operate by the appropriate state oversight agency. This section does not apply to Registered Apprenticeship programs, whose registration status is required to be assessed by OESC on a biennial basis at a minimum.

Appeal Process

Training providers can choose to appeal the rejection of their program for inclusion on the ETPL, or its subsequent termination of eligibility. The appeal must be submitted in writing via email to OESC within 14 days after notification of the decision. The appeal must include the justification for the appeal in the request. The provider must also have the right to request a hearing to discuss their appeal. If a hearing is requested, a board will be convened consisting of OESC management, the OESC ETPL Administrator, and the LWDB Director. A decision will be made within 60 days of appeal. This will be a final decision and, if the removal is upheld, the program will be prohibited from reapplying for one year from the date of the final decision or for two years if the removal was for submittal of false information.

State Responsibilities

OESC is responsible for: 1) The development, maintenance and dissemination of the State list of providers and programs; 2) Ensuring programs meet the eligibility criteria and performance levels established by the State; 3) Verifying the accuracy of submitted information; 4) Removing programs that do not meet established program criteria or performance levels; 5) Ensuring performance and cost information relating to each provider is available to the public; 6) Finalizing approval for providers and programs recommended by the Local Workforce Development Boards (LWDB); 7) Ensuring Registered Apprenticeship program sponsors are contacted to voice their willingness to be part of the ETPL (with assistance from DOLETA/OA); 8) Verifying the registration status of Registered Apprenticeship programs on at least a biennial basis; and 9) Ensuring new Registered Apprenticeship programs are placed on the ETPL in a timely manner.

Local Workforce Board Responsibilities

The LWDB is responsible for carrying out the following procedures assigned by the State: 1) Identification of in-demand sectors or occupations for the local area using relevant labor market

information; 2) Reviewing new and subsequent training providers and programs of training services to ensure accurate eligibility criteria and performance information has been provided prior to submission to the OESC for final approval; 3) Recommending the termination of providers due to the provider's submission of inaccurate eligibility and/or performance information; 4) Working with the State to ensure that sufficient numbers of providers of training services have the expertise in assisting individuals with disabilities and training providers are available to assist adults in need of adult education and literacy activities; and 5) Making recommendations to OESC for approval or denial of providers and/or programs based on the local area's demand occupation information and the program's performance.

Except for Registered Apprenticeships, LWDBs may require additional information and/or set higher levels of performance for providers to become or remain eligible for provider services in their area. If a Local Board establishes minimum standards in local policy, the Local Board may direct the removal of a provider's program from the eligible programs in that local area for failure to meet established criteria. The appeal process outlined in this section must be followed for rejected training providers or those providers removed for cause.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR FOR THE ADULT PRIORITY OF SERVICE REQUIREMENT IN WIOA SECTION 134 (C)(3)(E) THAT REQUIRES AMERICAN JOB CENTER STAFF, WHEN USING WIOA ADULT PROGRAM FUNDS TO PROVIDE INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES, TO GIVE PRIORITY OF SERVICE TO RECIPIENTS OF PUBLIC ASSISTANCE, LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT (INCLUDING ENGLISH LANGUAGE LEARNERS).

Oklahoma's Adult and Dislocated Worker policy addresses the priority requirements of WIOA sec. 134 for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient. As with all DOL-funded job training programs, veterans and eligible spouses continue to receive priority of service for individualized career services and training services authorized under WIOA Chapter 3 sec. 134(c).

Due to the statutorily required priority for Adult funds, the following priority of service requirements must be adhered to in this order by local workforce development boards (LWDBs) regardless of the level of Adult Formula funds received:

1. Veterans and eligible spouses who are recipients of public assistance, or who are determined to be other low-income individuals, or individuals who are basic skills deficient;
2. Non-Covered persons (that is, individuals who are not veterans or eligible spouses) who are public assistance recipients, determined to be low-income, or are basic skills deficient;
3. Veterans and eligible spouses who are not included in WIOA's priority groups;
4. Priority populations established by the LWDB; and
5. Non-Covered persons outside the groups given priority under WIOA.

As part of regular monitoring and oversight responsibilities, the State ensures that all LWDBs have developed and implemented an Adult Priority of Service policy. Additionally, each local area addresses the adult priority of service in their Adult and Dislocated Worker Policy.

Each local area utilizes either a Priority Ranking Worksheet and/or an Adult and Dislocated Worker Eligibility Form, both of which must be uploaded into the virtual case management system as an enrollment document, along with supporting documentation that validates the priority of service. These tools ensure that priority determinations are applied consistently at the point of service and are verifiable through case file review.

The State's Individual Employment Plan (IEP) policy also requires documentation of the Adult Priority of Service to ensure that IEPs target the specific needs of each eligible Title I Adult program participant. The IEP must include the appropriate combination of services needed to achieve each participant's employment goals and must describe how and when those services are provided. This process helps to ensure that the needs of individuals who meet one or more priority population criteria, particularly individuals who are low-income, receiving public assistance, or basic skills deficient, are appropriately addressed.

Finally, monitoring of the priority of service is routinely completed by desk reviews throughout the program year, particularly in instances when a local area request any technical assistance related to eligibility for individualized career services and/or training services funded by the Adult Formula program. When monitoring identifies priority of service deficiencies, the State provides technical assistance and requires corrective action, as appropriate, to ensure ongoing compliance with WIOA requirements.

5. DESCRIBE THE STATE'S CRITERIA REGARDING LOCAL AREA TRANSFER OF FUNDS BETWEEN THE ADULT AND DISLOCATED WORKER PROGRAMS

WIOA 20 CFR 683.130 allows Local Workforce Development Boards (LWDBs) to transfer up to 100% of program year funds between the adult and dislocated worker employment and training allocations. Transfers require OESC approval.

Conditions for Approval

- LWDBs may not transfer funds to or from the youth program.
- Transfers must be approved by the LWDB and documented in board meetings, or executive committee meeting, minutes.
 - Requests may be submitted prior to board approval with the date and time of the upcoming board or executive committee meeting. If requests are submitted without prior approval, OESC will not approve or deny until the submission of the required meeting minutes.
- Maintain compliance with WIOA program requirements for the receiving fund stream.
- Support service delivery needs based on labor market and economic data.
- All transferred funds are subject to priority of service requirements.

OESC has the authority to approve the request, as is, approve a partial transfer, or deny the request.

Justification for Fund Transfers

A Local Workforce Development Board must demonstrate a need for transferring funds, which may include:

- **Labor Market Demand:** Increased need for Adult or Dislocated Worker services based on local workforce data.
- **Program Enrollment Data:** Higher-than-expected enrollment in one program but under-enrollment in another.
- **Projected Expenditures:** The LWDB is at risk of underspending in one program while experiencing greater demand in another.
- **Strategic Initiatives:** The transfer will support new programs, such as sector partnerships, apprenticeships, or targeted training programs.

Fund Transfer Request Process

Step 1: Submission of Request

- The LWDB must submit a formal request using Attachment I, WIOA Formula Fund Transfer Request Form, via email to WorkforceServices.Inquiry@oesc.ok.gov.

Step 2: State Review

OESC will review the request within 15 days, evaluating:

- Local area's financial and programmatic performance.
- Justification based on labor market conditions and projected service needs.
- The impact on WIOA performance measures.

Step 3: Approval or Denial

- If approved, OESC will issue a written confirmation of the transfer
- If denied, OESC will provide a written explanation with recommendations for alternative funding strategies.

Appeal Process for Transfer Denials

If a transfer request is denied, the LWDB may submit a written appeal to VP of Workforce Service at DeAnna.Smith@oesc.ok.gov. The appeal must be done within 15 calendar days.

Appeal Submission Requirements:

- A formal appeal letter addressed to VP of Workforce.
- A detailed explanation of why the transfer is necessary.
- Any additional financial and labor market evidence supporting the request.

Review & Decision Process:

- The VP will review appeals within 30 days.
- If the appeal is upheld, the transfer will be approved.
- If the appeal is denied, the decision will be final and binding.

Compliance and Reporting Requirements for Transferred Funds

When Local Workforce Development Boards transfer funds between Dislocated Worker to Adult, the transferred funds adopt the rules and performance measures of the receiving program.

However, for fiscal tracking and reporting, the money is still recorded under the original funding source (in this case, Dislocated Worker funds). In other words, even though the performance follows Adult rules, the dollars are still counted as part of the Dislocated Worker fund allocation when reporting to the state or federal level.

LWDBs must still meet the minimum required thresholds tied to their original funding streams regardless of transfers. Failing to do so may result in corrective actions and or sanctions.

6. DESCRIBE THE STATE'S POLICY ON WIOA AND TAA CO-ENROLLMENT AND WHETHER AND HOW OFTEN THIS POLICY IS DISSEMINATED TO THE LOCAL WORKFORCE DEVELOPMENT BOARDS AND REQUIRED ONE-STOP PARTNERS. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.325, 20 CFR 618.824(A)(3)(I).

Excerpt from WSD 80-2024 Adult and Dislocated Worker Program: 20 CFR 618325(a)(1)] of the TAA Final Rule requires co-enrollment between the TAA Program and the WIOA DLW Program if the trade-affected worker is eligible for the DLW program. Data shows that co-enrollment between the TAA and Title I Dislocated Worker (DLW) programs results in better performance outcomes that are significant and consistent over time. Coordination between the Title I case manager and OESC's TAA staff is essential to ensure successful training completion and allows for the timely provision of individualized career services while improving the effectiveness of both the DLW and TAA Programs.

When ES staff identify any supportive needs necessary for the success of TAA participants, they are required to refer TAA-eligible individuals to the appropriate Title I staff member. WIOA staff must then provide supportive services as per this issuance and local supportive services policy.

A trade-affected worker has the option of declining co-enrollment with the WIOA DLW program. However, AJC staff must thoroughly explain the benefits of co-enrollment to individuals whose employment is affected by foreign trade. It is recommended that AJC staff obtain a written statement from trade-impacted workers who wish to decline enrollment in the WIOA Dislocated Worker program.

The statement should be uploaded to the virtual case management system. Regardless of whether a written statement to decline co-enrollment was provided, AJC staff must document in case/program notes that the benefits of co-enrollment were explained, as well as the individual's stated reason for declining DLW services (i.e., co-enrollment). This policy is disseminated when changes are required/made.

This policy is disseminated to Local Workforce Development Boards and required One-Stop operators whenever updates or changes are made. While no new TAA petitions have been certified since July 1, 2022, certain workers remain potentially eligible for certain benefits under previously certified petitions if their layoff dates fall within the applicable petition periods and occurred on or before June 30, 2022. State TAA staff continue to work with local office staff to ensure these workers are advised of all potential benefits and are strongly encouraged to co-enroll in WIOA.

7. DESCRIBE THE STATE'S FORMAL STRATEGY TO ENSURE THAT WIOA AND TAA CO-ENROLLED PARTICIPANTS RECEIVE NECESSARY FUNDED BENEFITS AND SERVICES. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.816(C)

In areas in which TAA participants are present, TAA and WIOA staff establish and implement Co-Enrollment procedures which identify which services should be provided by TAA staff and which should be provided by WIOA staff. This includes determining who is responsible for enrollment procedures, assessments, IEP development, training and supportive service costs, and case management services.

Although the number of participants being served under the TAA program has declined significantly, when a participant is deemed eligible for TAA benefits, OESC staff will continue to collaborate closely with WIOA partners to ensure coordinated, comprehensive service delivery. This approach is designed to maximize available resources and best meet the needs of each participant.

8. DESCRIBE THE STATE'S PROCESS FOR FAMILIARIZING ONE-STOP STAFF WITH THE TAA PROGRAM. 20 CFR 618.804(J), 20 CFR 618.305

Prior to the phased termination of the program, the State conducted annual and semi-annual statewide training on TAA policies and procedures. In addition, the State provided targeted one-on-one training in specific areas or local workforce offices affected by a trade-impacted event. This included in-person onsite training, as well as supplemental technical assistance via emails, phone calls, or virtual (Teams) meetings. Following program termination, outreach has been primarily focused on local offices with higher volumes of worker certification. This outreach has included guidance on posting local certification lists and instructions on how individuals may obtain information regarding potential eligibility. In the event of reauthorization, the state will reinstate statewide training on a quarterly basis or as needed.

C. YOUTH PROGRAM REQUIREMENTS.

WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA, STATES SHOULD DESCRIBE THEIR STRATEGIES THAT WILL SUPPORT THE IMPLEMENTATION OF YOUTH ACTIVITIES UNDER WIOA. STATE'S MUST-

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDED GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA.¹¹ FURTHER, INCLUDE A DESCRIPTION OF HOW THE STATE ASSISTS LOCAL AREAS IN DETERMINING WHETHER TO CONTRACT FOR SERVICES OR TO PROVIDE SOME OR ALL OF THE PROGRAM ELEMENTS DIRECTLY.

¹¹ SEC. 102(B)(2)(D)(I)(V)

The state developed criteria for Local Workforce Development Boards to utilize in awarding grants for youth workforce investment activities is Oklahoma Workforce System Directive 10-2025 "Fiscal Requirements, Procurement, and Contracting." Local areas must also follow the procurement requirements in the Uniform Code at 2 CFR 200.320.

The local board will evaluate the ability of the solicited contractors to deliver the full array of youth services within the workforce development area. Ability/experience normally includes a background in service provision within WIOA programs including experience in making performance measures and a track record in meeting or exceeding mandated performance criteria. All local areas must explain how the 14 WIOA youth program elements will be available to youth on an as needed basis and must include the elements in their procurements.

EXCEPTIONS: A local board may award grants or contracts on a sole-source basis if such board determines there is an insufficient number of eligible providers of youth workforce investment activities in the local area involved (such as a rural area) for grants and contracts to be awarded on a competitive basis: “sole source procurement” occurs when one of these circumstances apply:

- The item or service is available from only a single source.
- An emergency that will not permit the time required for competitive solicitation exists.
- After solicitation from several sources, competition is determined to be inadequate.

Following federal approval of Oklahoma’s proposed transition to a single statewide local workforce development area, the Governor’s Council for Workforce and Economic Development (GCWED) will assume the responsibilities of the Local Workforce Development Board. In this role, GCWED will carry out the functions assigned to local boards under WIOA, including the awarding of grants or contracts for youth workforce investment activities, and will follow the same state fiscal policies and procurement requirements described above, including Oklahoma Workforce System Directive 10-2025 and the federal procurement standards at 2 CFR 200.320.

2. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING EQUITABLE RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH. DESCRIBE PROMISING PRACTICES OR PARTNERSHIP MODELS THAT LOCAL AREAS ARE IMPLEMENTING AND THE STATE’S ROLE IN SUPPORTING AND SCALING THOSE MODELS WITHIN THE STATE FOR BOTH IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.

The state of Oklahoma vision for a quality public workforce is inclusive of services and outcomes that enable Oklahoma’s population of in-school and out-of-school youth the opportunity based on eligibility to enter our comprehensive programs consisting of the required 14 program elements, after receiving an assessment to determine any barriers to education and employment via multiple assessment types. For example, the TABE, OKCareer Guide in partnership with the Oklahoma Department of Career Technical Education, prior assessments of basic skills completed by partner agencies which are in line with state and federal statute to provide the flexibility to local partners and the seamless service individual youth need to fully engage in the appropriate services. We allow reliable assessment instruments and provide reasonable accommodation to youth with disabilities in the assessment process. Local programs may use previous basic skills assessment results if such previous assessments have been conducted within the past six months. Our effort is to ensure equality in opportunities in the outcomes for all youth.

Oklahoma continues its focus on all qualified youth being enrolled, served, and having a positive outcome and impact on the public workforce system including youth identified as disabled and those with severe developmental disabilities by connection of the Central Oklahoma Workforce

Innovation Board as an example with the Dale Rogers population of youth at the heart of our flexible assessment definition of basic skills deficient as described in the State Plan. We've also taken full advantage of the flexibility in Section 681 to allow all eligible youth to be served including juvenile offenders such as those currently enrolled or exited in Oklahoma's WIOA youth program including Central Oklahoma Juvenile Center youth. Our goal is to increase workforce participation in Oklahoma. Therefore, a comprehensive workforce system is an inclusive system developed for all eligible youth.

3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

Oklahoma requires local workforce development board front line staff to demonstrate and document that clients are informed of the fourteen (14) program elements, offered the 14 program elements instead of only offering the elements they feel appropriate for the specific client. The elements that tie to the ISS must also be included in the ISS, including the follow-up element that all clients are required to be recipients of. Front line staff must also reach out to the youth that are in the exit and follow-up stage and inform them and offer them follow-up services that don't require reenrollment. Oklahoma's WIOA Youth program is the 14 program elements:

- Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
- Alternative secondary school services, or dropout recovery services, as appropriate.
- Paid and unpaid work experiences that have academic and occupational education as a component of the work experience.
- Occupational skill training, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area involved, if the Local WDB determines that the programs meet the quality criteria described in WIOA sec. 123.
- Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
- Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors:
- Supportive services, including the services listed in § 681.570.
- Adult mentoring for a duration of at least 12 months that may occur both during and after program participation.

- Follow-up services for not less than 12 months after the completion of participation, as provided in § 681.580.
- Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth:
- Financial literacy education.
- Entrepreneurial skills training.
- Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.
- Activities that help youth prepare for and transition to postsecondary education and training.

The current youth policy also addresses each of the 14 program elements in detail and the state has set the elements as service delivery requirements in accordance with the WIOA statute; provided definitions of each element in detail in policy, and we also in policy have provided Oklahoma Service Link uploading, data entry and source documentation requirements to ensure that our local boards have the technical resources needed to successfully apply these elements.

Our local boards have been made aware through our policy and monitoring component that the discretion to determine what specific program services a youth participant receives is based on each participant's objective assessment and individual service strategy (ISS).

Technical assistance has also been provided in policy and the monitoring component that our local programs staff are not required to provide every program service to each participant. Again, provision of the required elements is based on objective assessment and ISS.

We have advised our local boards of the necessity of braiding resources and will continue to support local partnering with qualified organizations with documented success at providing the elements.

The goal is to introduce youth to outlets to aid them in graduating from high school and venturing into postsecondary education. The state expects the providers of youth elements to evolve into the process for the purpose of providing specific elements via WIOA funding and leveraged funds and agreement or referral to a provider of the unique services. Examples of these providers are the public school system, youth-based contractors, nonprofit organizations such as Habitat for Humanity, Salvation Army and the Urban League, Career Tech & Community Colleges, State Housing Agencies, YMCA and civil authorities.

4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR "REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(B)(III)(VIII) AND FOR "REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT" CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII). IF THE STATE

DOES NOT HAVE A POLICY, DESCRIBE HOW THE STATE WILL ENSURE THAT LOCAL AREAS
WILL HAVE A POLICY FOR THESE CRITERIA.

Oklahoma developed additional assistance criteria to include a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment as follows:

- A youth with a parent or legal guardian that is currently or previously incarcerated for a felony conviction;
- A youth with a parent or legal guardian who lacks a high school diploma or GED;
- A youth who attends or has attended chronically under performing schools listed as a priority or targeted intervention school on the Oklahoma State Department of Education website <http://sde.ok.gov/sde/priority-schools>; or <https://sde.ok.gov/comprehensive-support-and-improvement>; and/or
- A youth between 18-24 years of age with a pattern of poor work history defined as a history that includes non-reoccurring employment income and sporadic employment.

D. SINGLE-AREA STATE REQUIREMENTS

IN STATES WHERE THERE IS ONLY ONE LOCAL WORKFORCE INVESTMENT AREA, THE GOVERNOR SERVES AS BOTH THE STATE AND LOCAL CHIEF ELECTED OFFICIAL. IN SUCH CASES, THE STATE MUST SUBMIT ANY INFORMATION REQUIRED IN THE LOCAL PLAN (WIOA SECTION 106(D)(2)). STATES WITH A SINGLE WORKFORCE AREA MUST INCLUDE—

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)
2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)
3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)
4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.
5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.
6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.
7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.

8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

E. WAIVER REQUESTS (OPTIONAL)

STATES WANTING TO REQUEST WAIVERS AS PART OF THEIR TITLE I-B OPERATIONAL PLAN MUST INCLUDE A WAIVER PLAN THAT INCLUDES THE FOLLOWING INFORMATION FOR EACH WAIVER REQUESTED:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;
2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;
3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;
4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
 - A. SUPPORTING EMPLOYER ENGAGEMENT;
 - B. CONNECTING EDUCATION AND TRAINING STRATEGIES;
 - C. SUPPORTING WORK-BASED LEARNING;
 - D. IMPROVING JOB AND CAREER RESULTS, AND
 - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND
6. DESCRIBES THE PROCESSES USED TO:
 - A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
 - B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
 - C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
 - D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
 - E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.

**7. THE MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES
OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE
STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.**

Oklahoma is requesting the following six waivers:

1. State Board Serving as Local Board in a Single Local Area State

I. Background and Purpose

The State of Oklahoma is implementing a comprehensive redesign of its workforce system, transitioning from a fragmented multi-board structure to a single, consolidated statewide local workforce development area under the Workforce Innovation and Opportunity Act (WIOA). To support this transition, Oklahoma requests a waiver to authorize the Governor's Council for Workforce and Economic Development (GCWED) to perform all roles and responsibilities of a Local Workforce Development Board (LWDB).

This waiver is essential to executing Oklahoma's Workforce System Transformation as outlined in the State Plan. The transformation replaces the current four-board governance system with one unified statewide area, consolidates oversight under GCWED, and implements statewide functional service-delivery models for outreach, intake, career planning, case management, business services, co-enrollment, referrals, and follow-up. The transformation reconfigures the American Job Center (AJC) network around comprehensive Career Tech-based hubs supported by community and virtual access points and relies on EmployOklahoma and other integrated data systems to unify accountability and cross-agency service coordination. It fully aligns WIOA Title I with Wagner-Peyser, UI/RESEA, Adult Education, Vocational Rehabilitation, TANF, SNAP E&T, and other partner programs.

Without the ability to operate as a single local area with GCWED functioning as the local board, Oklahoma would be required to retain or reestablish governance structures that perpetuate fragmentation and run counter to the State Plan. The State requests approval for Program Years PY26-PY28.

II. Legal Basis for Waiver Authority Under WIOA & Actions Taken to Remove Barriers

WIOA permits waivers that allow states to improve service delivery and outcomes while maintaining worker protections and partner funding obligations. Oklahoma seeks a waiver of WIOA Section 107(b) and all related requirements that assume the existence of multiple LWDBs, as well as 20 CFR Part 679 and associated regulations requiring multiple local-area-level governance structures.

To ensure the single-area model is legally and operationally sound, the Governor has issued statewide notice to operate as a single local area and has directed all relevant agencies and partners to align governance and planning efforts. GCWED will affirm its role as both the State and Local Workforce Development Board and will carry out all applicable functions under WIOA Sections 101 and 107 (to the extent not waived). The Attorney General's Office has reviewed applicable statutes and confirmed that no statutory amendments are required for GCWED to serve as the local board under federal waiver authority.

Existing LWDBs and Chief Local Elected Officials (CLEOs) were formally notified on January 27th, 2026, of the State's intent to transition to a single local area, sunset local boards by June 30th,

2026, and consolidate governance responsibilities within GCWED. Any remaining regional structures will function solely for administrative coordination and will not constitute WIOA-recognized local areas.

III. Anticipated Impact and Benefits

Approval of this waiver will allow Oklahoma to align governance with its statewide transformation strategy by:

- Eliminating duplicative and inconsistent local governance structures,
- Consolidating accountability under GCWED,
- Ensuring uniform statewide policies, bylaws, MOUs, fiscal agent arrangements, and service standards,
- Reducing administrative overhead previously associated with maintaining multiple boards, monitoring regimes, and procurement systems,
- Supporting consistent, functional models across all workforce service delivery locations,
- Strengthening co-location and staffing arrangement within Career Tech centers and partner facilities
- Ensuring that employers experience a single brand, point of entry, and workforce services system, and
- Enabling more flexible service strategies across geographic boundaries

The State expects improvements in Measurable Skill Gains, credential attainment, employment rates, median earnings, and a reduction in rural–urban performance disparities.

IV. Alignment with U.S. DOL Policy Priorities

Alignment with America’s Talent Strategy (TEGL 07-25)

This waiver directly advances the U.S. Department of Labor’s America’s Talent Strategy by strengthening system-wide accountability, employer engagement, and performance outcomes. Consistent with Pillar IV: Accountability, consolidation of State and Local Workforce Development Board functions establishes a single entity responsible for outcomes, resource allocation, and performance results across the workforce system. This unified governance structure ensures that entities responsible for service delivery are also accountable for results and the stewardship of public funds, reducing fragmentation and diffused responsibility inherent in multi-board systems.

This governance consolidation also supports the TEGL 07-25 emphasis on measurable and transparent results for job seekers and employers by establishing a single statewide entity responsible for performance results and stewardship of public funds, including results in employment, earnings, and credential attainment.

A single statewide local area enhances employer engagement by creating a unified employer interface, implementing consistent sector strategies, and aligning workforce and economic development initiatives. It improves education and training integration by strengthening

coordination among Career Tech, higher education, K–12 CTE, Adult Education, and Vocational Rehabilitation.

The unified structure facilitates statewide expansion of work-based learning, including apprenticeships, on-the-job training, incumbent worker training, and youth work experience, and supports stronger performance management, consistent adoption of best practices, and improved data-driven decision-making. Oklahoma’s model enhances equity and accessibility by expanding services in rural, tribal, and underserved communities, strengthening virtual and hybrid options, and embedding consistent equity strategies statewide.

- **Employer Engagement**
 - A single statewide area creates a unified point of contact for employers, ensures consistent sector strategies, and strengthens workforce–economic development alignment.
- **Education and Training Integration**
 - The model deepens statewide coordination among Career Tech, higher education, K–12 CTE, Adult Education, and Vocational Rehabilitation, aligning training pathways and credential strategies.
- **Work-Based Learning Expansion**
 - Statewide governance enables consistent implementation of apprenticeships, on-the-job training, incumbent worker training, and youth work experiences, reducing employer confusion and administrative burden.
- **Improved Job and Career Outcomes**
 - The unified structure supports more robust performance management, rapid scale-up of promising practices, and stronger data-driven decision-making across all partners.
- **Equity, Accessibility, and Innovation**
 - The model expands access in rural, tribal, and underserved communities, strengthens virtual and hybrid service options, and ensures statewide application of equity goals and strategies.

V. Individuals Affected and Impact on Disadvantaged Populations

All WIOA-eligible individuals statewide will be affected by this waiver, including adults, dislocated workers, youth, veterans and their spouses, individuals with disabilities, English language learners, justice-involved individuals, rural and tribal residents, low-income households, and individuals experiencing homelessness or instability.

The waiver will improve equity by ensuring consistent service expectations statewide, reducing disparities tied to uneven local administrative capacity, and strengthening outreach, co-enrollment, and coordinated support structures for individuals with significant barriers. No individual will lose services or eligibility as a result of this waiver.

VI. Monitoring, Notice, Comment, and Reporting

GCWED, the Oklahoma Workforce Commission, and the Oklahoma Employment Security Commission (OESC) will monitor the transition to the single-area model, including the official designation, the sunset of local boards, the completion of statewide policies and functional models, and ongoing performance through EmployOklahoma dashboards. All LWDBs and CLEOs received formal notice on January 27th, 2026.

Public involvement included a written comment window, statewide meetings, webinars, and GCWED public sessions. The waiver will be posted publicly on OK Works website inside the State Plan modification and shared with employers, labor organizations, education partners, tribal nations, community-based organizations, and other stakeholders. Oklahoma will report improvements in governance, cost efficiency, service consistency, rural equity, and performance outcomes in our WIOA Annual Report.

VII. Evidence Supporting the Waiver

Findings from the 2025 Workforce Transformation Sprints and other internal analyses show:

- Significant duplication across four local boards
- Employer confusion due to multiple points of entry
- Substantial regional disparities in performance
- High administrative costs associated with supporting multiple governance structures

This evidence affirms that the single-area model will deliver measurable improvements in performance, access, accountability, and employer engagement.

VIII. GCWED Structure and Membership

GCWED will serve as both the State and Local Workforce Development Board under this waiver. Its membership includes a business majority and representation from all WIOA Title I–IV agencies, Career Tech, higher education, unemployment insurance and RESEA, economic development, labor, local elected officials, and rural and tribal constituencies. GCWED operates through standing committees and receives administrative support from the Oklahoma Employment Security Commission.

IX. Local Area Designation and Appeals Process

Oklahoma will maintain a fully compliant process for any entity seeking designation as a local area, including written requests, clear review criteria such as capacity and labor market alignment, written decisions, and appeal rights extending to the Secretary of Labor. While no such requests are anticipated, the process remains available in accordance with WIOA and 20 CFR 679 and 683.

X. Period of Request and Summary

Oklahoma requests approval for Program Years 2026-2028.

This waiver is central to building a unified, responsive, and high-performing workforce system. It eliminates structural fragmentation, strengthens statewide consistency, enhances employer engagement, increases accountability, and expands access and equity across all regions.

Approval will enable Oklahoma to implement its Workforce System Transformation and deliver improved outcomes for workers, employers, and communities statewide. Oklahoma appreciates your consideration and stands ready to provide any additional information required.

2. Performance Accountability Flexibility and Transitional Operational Flexibilities During Statewide Workforce System Restructuring

I. Background and Purpose

The State of Oklahoma is undertaking a comprehensive transformation of its workforce system, including consolidation of local workforce areas, redesign of the American Job Center (AJC) network, modernization of service delivery, and major restructuring of administrative and program operations.

Consistent with the U.S. Department of Labor's America's Talent Strategy (TEGL 07-25), this waiver request is intended to protect the integrity of performance accountability so that reported outcomes such as job placement, earnings, and credential value accurately reflect program effectiveness during a period of significant structural change. In alignment with Pillar IV: Accountability, the State seeks temporary flexibility to ensure that performance data accurately reflects program effectiveness, responsible stewardship of public funds, and true participant outcomes as the workforce system transitions to a new governance, service-delivery, and data environment.

As part of this transition, Oklahoma is currently operating under a monthly, conditional performance accountability waiver approved by the U.S. Department of Labor, necessitated by the phased implementation of a new statewide case management and reporting system that is not yet able to fully calculate or validate all required WIOA performance metrics. While interim reporting and data validation processes are in place, this month-to-month waiver structure creates administrative burden and uncertainty without improving outcome transparency.

This request seeks to replace recurring short-term conditional waivers with a single, time-limited, outcome-focused transition framework that maintains accountability while system modernization is completed.

During this transitional period, strict adherence to certain WIOA performance accountability and expenditure-timeline requirements will create unintended barriers and measurement distortions that could misrepresent program performance return on investment. . We request a temporary, time-limited transition waiver package that provides relief in the following areas:

1. Performance Accountability Flexibility, including temporary adjustment or suspension of negotiated performance levels where restructuring disrupts baseline performance.
2. Allocation and Expenditure Timeline Flexibility, including carryover and obligation extensions to support system realignment.
3. Permission to Operate the Current System During Transition to ensure uninterrupted service delivery while new governance, cost structures, AJCs, and data systems are implemented.

4. Authority to Adjust or Re-baseline Negotiated Performance Measures during and immediately after restructuring to maintain fairness and accuracy.

These temporary flexibilities support the use of consistent, meaningful performance metrics once restructuring stabilizes, consistent with Pillar IV's emphasis on valid, comparable outcome measurements. Such temporary flexibilities have been granted by DOL in previous transition periods (e.g., WIOA implementation transition waivers, natural disaster waivers, and system realignment waivers). The request aligns with ETA's general waiver policy and the goals of WIOA Section 189(i)(3)(B).

II. Legal Basis for Waiver Authority Under WIOA

The State requests temporary relief from the following WIOA statutory and regulatory requirements:

1. Performance Accountability Requirements

- WIOA Section 116(b) (state and local performance accountability system);
- 20 CFR Part 677 (performance reporting, indicators, statistical adjustment model);
- Flexibility to temporarily adjust, freeze, or renegotiate performance levels disrupted by the transition.

2. Expenditure Timelines and Allocation Requirements

- WIOA Sections 128(c) and 133(c)(6) (obligation and expenditure deadlines for Youth and Adult programs);
- 20 CFR §§ 683.110–683.120 (funding period and reallocation).
This relief will support continuity during restructuring, consolidation, and potential AJC realignment.

3. Operational Continuity During Transition

- Temporary authority to operate the current system, including existing AJCs, local plans, MOUs/IFAs, and performance arrangements, while new structures are being implemented.

III. Justification for the Waiver

A. Disruption of Performance Baselines During Transition

Restructuring workforce regions, cost structures, partner MOUs, and the AJC network creates unavoidable volatility in:

- Caseload patterns
- Participant flow and exit patterns
- Staffing and leadership structures
- Data coding and reporting
- Training provider availability

- Budget allocations and expenditure rates
- Performance calculation and validation during phased deployment of a new statewide data system

This volatility has required the State to rely on temporary, conditional performance approvals while data functionality is completed, underscoring the need for a more stable transition waiver that preserves accurate outcome measurement.

Standard WIOA performance targets, based on historical data, will not reflect these disruptions and would misstate job placements, earnings outcomes, and cost effectiveness during the transition period. Without temporary flexibility, the State risks:

- Inaccurate public reporting of outcomes,
- Misleading performance comparisons,
- Erosion of confidence in workforce system accountability, and
- Reduced employer and partner engagement.

DOL has previously granted similar performance flexibility when states undergo major reorganizations or extraordinary conditions.

B. Expenditure and Allocation Timelines Will Be Affected

During restructuring, the State must:

- Transition staff and operational systems
- Realign budgets and cost structures
- Re-designate local areas
- Adjust AJC footprints
- Implement new MOUs/IFAs
- Migrate data/reporting systems

These steps will temporarily affect expenditure rates. Without flexibility, the State may face artificial compliance issues due solely to the reorganization. Temporary expenditure flexibility is necessary to ensure that spending patterns during restructuring do not distort return-on-investment analyses or penalize programs delivering strong employment outcomes.

C. Allowing Current Systems to Operate During Transition Ensures Service Continuity and Uninterrupted Tracking of Participant Employment and Earnings Outcomes

This waiver enables:

- Continuous services to job seekers and employers
- Compliance with all core WIOA participant protections
- Prevention of service gaps caused by premature closure of the old system
- Time to finalize new performance methodologies and cost structures

D. Adjustment of Negotiated Performance Levels Is Necessary and Permissible

Under WIOA Section 116(b)(3)(A)(v), DOL may adjust negotiated levels due to:

- Economic conditions
- Characteristics of participants
- Structural changes affecting performance

Major statewide restructuring qualifies as a “structural change.”

This waiver formalizes that flexibility and avoids misinterpretation during ETA monitoring.

The transition to a single statewide local workforce development area, consolidation of governance and service delivery, redesign of the American Job Center network, and implementation of a new statewide case management system will temporarily affect participant flow, exit timing, service coding, and performance reporting. Without limited, time-bound flexibility, performance results during this transition would not accurately reflect program effectiveness, labor market impact, or value to employers and participants and could undermine the accountability objectives WIOA is designed to advance.

IV. Goals and Expected Outcomes

Approval of this waiver will:

1. Maintain fair, accurate, and equitable measurement of job placement, earnings, credential value, and employment retention outcomes during transition
2. Prevent disruptions in services to job seekers and employers
3. Support effective implementation of new governance and service-delivery models
4. Ensure responsible use of federal funds during expenditure realignment
5. Allow the State to stabilize the system, then negotiate new, more accurate performance levels
6. Preserve transparency and comparability of performance data for workers, employers, ETA, and the public once post-transition baselines are established.

V. Proposed Waiver Terms and Conditions

Consistent with federal expectations for valid and accurate performance measurement, Oklahoma will propose revised negotiated performance levels once the statewide governance and service-delivery transition stabilizes and reporting integrity is re-established.

Oklahoma requests a two-year transition waiver, with the following commitments:

- Use established data to propose revised performance targets once restructuring stabilizes
- Maintain and report performance to the extent data allow, including continued tracking of employment, earnings, and credential outcomes where feasible

- Preserve all participant protections, priority-of-service rules, and non-discrimination requirements
- Provide quarterly progress updates to ETA
- Apply corrective action, reform, or removal from eligibility for programs that fail to demonstrate positive labor market outcomes once post-transition performance baselines are in effect
- Resume full compliance with all performance and expenditure requirements at the end of the waiver period
- Provide ETA with a written performance re-baselining no later than the first full program year after implementation stabilization, using available post-transition data and the WIOA performance framework.

VI. Conclusion & Request

Oklahoma commits that:

- This waiver will not reduce service quality or access
- All core WIOA programs will continue to operate
- Accountability for fiscal integrity will remain in place
- Oklahoma will continue to use DOL's WIOA statistical adjustment model where applicable
- New performance baselines will be negotiated with ETA based on post-transition data
- The waiver supports innovation and modernization consistent with federal priorities

Oklahoma respectfully requests approval of this Performance Accountability and Transition Flexibility Waiver to provide temporary, necessary relief during a major statewide workforce system restructuring. The waiver will ensure that performance accountability during restructuring remains accurate, transparent, and outcome-focused, while enabling Oklahoma to transition to a workforce system where funding decisions are tied to demonstrable labor market results.

This waiver supports Pillar IV's objective of aligning federal workforce funding with measurable employment outcomes by ensuring that accountability decisions are based on valid, comparable, and meaningful data.

Replacing recurring monthly conditional waivers with a defined transition period also supports Pillar IV's emphasis on accountability by ensuring that performance decisions are based on complete, validated, and comparable outcome data, rather than provisional metrics produced during system construction.

Oklahoma stands ready to provide any additional information requested by ETA.

3. Flexibility to Use Training Contracts with Consortiums in Lieu of Individual Training Accounts (ITAs) Within a Single Statewide Local Workforce Development Area

I. Background and Purpose

The State of Oklahoma is undertaking a comprehensive transformation of its workforce system, including the transition to a single statewide local workforce development area under the Workforce Innovation and Opportunity Act (WIOA). This transformation is intended to create a simplified, integrated workforce system that enables individuals to enter, reenter, and advance within the labor market through clear, employer-validated pathways that support upward mobility and long-term economic independence. It consolidates governance, procurement, and service delivery under a unified statewide structure to improve efficiency, consistency, and alignment with employer demand while prioritizing industry-driven talent pathways where employers identify critical, hard-to-fill, in-demand occupations which culminate in clearly defined employment outcomes post-training. Further, it creates a flexible and adaptable workforce system capable of responding rapidly to changes in local economic conditions, emerging industries, and evolving employer skill needs through continuous coordination between employers, educators, and training providers.

As part of this redesign, Oklahoma is implementing a consortium-based training delivery model, under which training services are procured and delivered through contracts with regional or statewide consortiums of education and training providers. Employers within each consortium would play a leading role in steering training investments toward roles, credentials, and competencies that directly correspond to current and projected workforce demand. Under this model, WIOA Title I funds are used to purchase training through contracts, while Title III (Wagner-Peyser) staff provide participant intake, case management, and career services on behalf of the single local area.

Consistent with the U.S. Department of Labor's America's Talent Strategy (TEGL 07-25), Oklahoma's consortium-based training model is designed to ensure that employers play a central role in defining skill needs, validating training curricula, and hiring program completers. In alignment with Pillar I: Industry-Driven Strategies and Pillar II: Worker Mobility, training contracts enable cohort-based, employer-aligned, and work-based learning models, including apprenticeships, on-the-job training, and sector partnerships, that are not operationally compatible with individual participant-level Individual Training Accounts.

To operate this model, Oklahoma seeks a waiver under WIOA to allow the use of training contracts in lieu of Individual Training Accounts. The ITA model is not compatible with consortium-based procurement and creates administrative and fiscal barriers to implementing a unified statewide training strategy.

This waiver request is specific to operation within a single statewide local area and is not intended to permit independent or discretionary practices across multiple local workforce areas.

II. Legal Basis for Waiver Authority Under WIOA

WIOA authorizes the Secretary of Labor to approve waivers of statutory and regulatory requirements, except for provisions related to wage and labor standards, nondiscrimination, and worker protections, when such waivers improve service delivery and workforce outcomes.

Relevant provisions include:

- WIOA Section 134(c)(3) Training services
- 20 CFR §§ 680.300–680.340 Individual Training Accounts and training contracts

Federal regulations generally require training services to be provided through ITAs, with limited exceptions for training contracts. However, these provisions govern administrative delivery mechanisms and may be waived where a state demonstrates that an alternative approach better supports workforce system design while preserving participant protections, fiscal accountability, and performance outcomes.

The State is not requesting a waiver of:

- Participant eligibility requirements
- Informed choice
 - Informed choice will be preserved by clearly identifying employer-validated credentials, localized labor market demand, and training pathways available through consortium contracts and ensuring participants receive sufficient information to select pathways that support upward mobility and long-term economic independence.
- Performance accountability
- Nondiscrimination or accessibility protections

The waiver is limited solely to how training services are procured and paid for within a single-area, consortium-based training model.

III. Justification for the Waiver

A. Consortium-Based Training Requires Contract Authority

Under Oklahoma’s redesigned statewide model, training is delivered through consortiums composed of:

- Education and training providers,
- Career and technical institutions,
- Employer partners, and
- Other eligible entities aligned around industry or sector strategies.

Consortiums operate as coordinated training entities, not as individual vendors delivering training to individual participants. As such, they cannot be funded effectively through participant-level ITAs, which are designed for one-to-one transactions between an individual and a single provider.

Training contracts are the only administratively sound mechanism to:

- Fund consortiums as collective training entities,
- Support cohort-based and employer-aligned training,
- Establish shared curricula and outcomes, and
- Ensure fiscal accountability across multiple partners.

B. Integration of Title I Training and Title III Case Management

In the single statewide local area model, Wagner-Peyser (Title III) staff provide case management and career services functions traditionally associated with Title I, including:

- Intake and eligibility determination,
- Career planning and service coordination,
- Referral to training,
- Ongoing participant support and follow-up.

Under this integrated service model:

- Participants remain enrolled in WIOA Title I as appropriate,
- Title I funds are used to purchase training services,
- Title III staff act as the frontline case managers, and
- Training delivery is carried out through consortium contracts.

This integrated approach improves service continuity, reduces duplication, and supports a customer-centered experience by creating a single point of entry for career services, training, and reemployment support, allowing participants to navigate the workforce system more easily and progress more quickly toward employment and occupational advancement.

Training contracts also provide Oklahoma with the flexibility needed to design, test, and scale innovative training models, such as consortium-based, sector-driven, and work-based learning approaches, which can be continuously refined based on employer feedback and performance outcomes. This model eliminates silos between training funding and service delivery, enabling faster coordination, streamlined operations, and more responsive adjustments to workforce strategies as local labor markets continue to evolve.

However, this integrated structure is not operationally compatible with an ITA-based payment structure, which assumes participant-level contracting and local procurement discretion.

C. Incompatibility of ITAs with a Single-Area, Consortium Model

The ITA model was designed for systems with:

- Multiple local areas,
- Decentralized procurement authority,
- Individually selected training providers, and
- Local board-specific training strategies.

In a single statewide local area, these assumptions no longer apply. Requiring ITAs in this context would:

- Prevent consortiums from receiving training funds,
- Fragment statewide training strategies,
- Increase administrative burden without improving outcomes, and
- Undermine the efficiency gains of system consolidation.

The ITA model, which funds training in isolation from specific employer hiring commitments, perpetuates a fragmented approach to workforce development that does not ensure training leads directly to employment in in-demand occupations. Training contracts enable Oklahoma to structure employer-validated pathways with shared performance expectations tied to placement into hard-to-fill roles and support short-term and stackable credentials aligned to industry demand, allowing participants to build skills progressively and advance along defined career pathways without unnecessary retraining or reenrollment.

A waiver is therefore necessary to align training procurement with the State's single-area operational design.

This waiver further supports Pillar V: Flexibility and Innovation by allowing Oklahoma to implement training delivery models that scale employer-designed pathways statewide, while maintaining all WIOA participant protection, informed choice, fiscal accountability, and performance reporting requirements.

IV. Anticipated Impact and Benefits

Approval of this waiver will:

1. Enable Consortium-Based Training
 - Allow consortiums to receive and manage training funds
 - Support sector, pathway, and cohort-based training models
2. Improve System Integration
 - Align Title I training dollars with Title III case management
 - Reduce duplication across programs and staff roles
3. Increase Efficiency and Fiscal Control
 - Centralize procurement under the single Title I grant
 - Reduce administrative and transactional costs
4. Strengthening Industry-Driven Talent Pathways
 - Support employer-driven curricula and hiring pipelines
 - Scale training to meet statewide labor market demand
 - Support pathways with defined employment outcomes, including placement into apprenticeships or direct hire opportunities

- Ensure credentials and curricula are validated by industry partners
- 5. Maintain Participant Protections
 - Preserve eligibility, informed choice, and performance accountability
 - Maintain nondiscrimination and accessibility requirements
- 6. Increase System Agility and Innovation
 - Enable rapid adjustment of training investments to respond to emerging industry and local economic shifts
 - Support pilot programs and innovative training models that can be scaled statewide based on verified and validated performance outcomes
 - Create more responsive feedback loops between employers, educators, training providers, and workforce agencies.
- 7. Technology and Data Integration
 - Integrates data systems and labor market information tools to guide training investments, inform participant choice, and track career progressions and outcomes.
- 8. Promote Worker Mobility and Advancement
 - Support entry, reentry, and advancement through employer-validated career pathways
 - Enable progressive skill-building through short-term and stackable training
 - Improve participant ability to advance into higher-wage roles over time.

V. Proposed Waiver Terms and Conditions

If approved, Oklahoma commits to the following:

1. Single-Area Administration
 - All training contracts will be executed under the single statewide Title I grant and administered by the statewide local workforce development board or its designated administrative entity.
2. Consortium Eligibility and Oversight
 - Consortia receiving training funds will meet state-defined eligibility and performance standards.
 - Contracts will clearly define roles, responsibilities, and deliverables.
3. Integrated Service Delivery
 - Wagner-Peyser staff will provide case management and career services in coordination with Title I training enrollment.
4. Fiscal Accountability

- All contracts will comply with:
 - 2 CFR Part 200 (Uniform Guidance),
 - State procurement requirements, and
 - WIOA cost allowability rules.
- 5. Performance and Monitoring
 - Training outcomes will be tracked using WIOA performance indicators.
 - Contracts will include monitoring and corrective action provisions.
- 6. Nondiscrimination and Accessibility
 - All services will comply with WIOA Section 188 and applicable accessibility requirements.

VI. Conclusion and Request

Approval of this waiver is essential to support Oklahoma’s transition to a single statewide local workforce development area and to operationalize a consortium-based training model integrated with Wagner-Peyser case management.

Oklahoma respectfully requests approval of a waiver under WIOA to permit the use of training contracts, rather than Individual Training Accounts, to fund training delivered through consortiums, with Title III staff providing case management and career services.

This waiver will enable a unified, efficient, employer-driven, outcome-focused workforce system that directs talent into in-demand occupations through validated industry pathways while preserving all statutory protections and accountability requirements.

4. Flexibility to Redefine AJC Service-Delivery Structure and Implement a Statewide MOU/IFA Model

I. Background and Purpose

The State of Oklahoma is undertaking a comprehensive redesign of its workforce system, including a transition to a consolidated statewide service-delivery model. As part of this transition, Oklahoma seeks a waiver under the Workforce Innovation and Opportunity Act (WIOA) to allow:

1. Flexibility in how Oklahoma defines and classifies American Job Centers (AJCs) during and after transition, including temporary or permanent deviations from the federal definitions of
 - “Comprehensive One-Stop Center” (20 CFR §678.305)
 - “Affiliate One-Stop Site” (20 CFR §678.310)
2. Authorization to implement a statewide MOU and statewide Infrastructure Funding Agreement (IFA) with uniform cost-sharing across multiple facilities, even though WIOA and DOL generally anticipate local-area-specific IFAs tied to individual buildings.

These flexibilities are needed to support an orderly transition, align service delivery with statewide strategic goals, and prevent interpretation issues during future DOL monitoring.

II. Legal Basis for Waiver Authority Under WIOA

WIOA permits waivers that provide states with flexibility to redesign service delivery and improve outcomes, provided worker protection and partner funding obligations are maintained.

Relevant regulations include:

- 20 CFR §§ 678.305–678.320 (definitions of comprehensive, affiliate, and specialized centers)
- 20 CFR §§ 678.500–678.760 (MOU/IFA requirements)

While the funding obligations for infrastructure costs may not be waived, the structure and format of the MOU/IFA and the classification of sites may be waived, as they relate to administrative organization rather than statutory protections.

III. Justification for the Waiver

A. Flexibility to Define the AJC Structure During Transition

The federal definitions of “comprehensive” and “affiliate” centers assume a relatively rigid model tied to local-area geography and partner colocation. As Oklahoma transitions to a streamlined, statewide service model, many facilities will operate in hybrid or transitional roles that do not neatly align with the federal categories.

A waiver allows Oklahoma to:

- Establish temporary classifications that reflect transitional operations
- Define a modernized statewide AJC structure aligned with customer needs
- Adjust center types as facilities are consolidated, relocated, repurposed, or closed
- Maintain full compliance without triggering federal findings due to temporary or non-traditional configurations

This flexibility is essential to avoid compliance risk during the transition period. This approach supports a more unified and navigable access network by enabling hybrid and virtual service delivery, streamlined intake practices, and modern service configurations that allow customers to access services without unnecessary complexity during and after transition.

B. Statewide MOU/IFA and Cost-Sharing Model

Under DOL’s typical interpretation:

- MOUs/IFAs are negotiated per local workforce area,
- IFAs are often tied to each building, and
- Cost allocation is expected to be center-specific.

However, Oklahoma seeks to implement a statewide cost-sharing framework, covering multiple facilities and partners under a single MOU and infrastructure budget.

A waiver is needed because:

- The statewide model deviates from DOL's traditional local-area review structure
- Statewide cost allocation must reflect system-wide use and benefit rather than per-center metrics
- A single statewide MOU/IFA improves consistency, reduces administrative burden, and supports the system redesign
- Without explicit waiver authority, DOL monitoring could interpret a statewide IFA as non-compliant

IV. Anticipated Impact & Benefits for Job seekers, Employers, and the Workforce System

Granting this waiver will:

1. Improve System Efficiency and Reduce Burden

- Eliminate the need to negotiate dozens of separate MOUs/IFAs
- Reduce administrative duplication and redirect resources to customer services

2. Support Modernized Service Delivery

- Allow flexible AJC structures (virtual hubs, specialized centers, hybrid service points)
- Facilitate new service channels not envisioned under the legacy MOU/IFA framework

3. Enhance Transparency and Partner Equity

- Implement a uniform statewide cost-allocation methodology based on proportionate benefit
- Ensure fair and consistent partner contributions across all locations

4. Reduce Compliance Risk During Transition

- Prevent federal monitoring findings arising solely from non-traditional but strategically necessary AJC configurations
- Provide a legal mechanism for flexibility while maintaining full partner funding responsibilities

V. Proposed Waiver Terms and Conditions

If approved, Oklahoma commits to:

1. Maintaining all required workforce partner roles and funding obligations under WIOA Section 121.
2. Ensuring the statewide MOU/IFA includes:
 - A statewide infrastructure cost budget
 - A transparent allocation methodology compliant with 2 CFR 200
 - Annual review and reconciliation procedures

3. Continuing to provide universal access to all required WIOA services in each region of the state.
4. Maintaining nondiscrimination, accessibility, and physical/virtual access requirements.
5. Not reducing the quality or availability of services as a result of this waiver.

VI. Conclusion & Request

Approval of this waiver will enable the State to:

- Implement a unified statewide service model
- Streamline workforce system governance
- Accelerate consolidation and modernization of AJC facilities
- Establish a flexible, customer-centered access network
- Improve consistency and transparency in partner cost-sharing
- Ensure that the transition proceeds without federal compliance risk

Oklahoma respectfully requests a waiver under WIOA to:

1. Allow temporary and permanent flexibility in classifying service sites beyond the federal definitions of comprehensive and affiliate centers; and
2. Permit the State to design and implement a statewide MOU/IFA and cost-sharing methodology appropriate to the new statewide service delivery model.

This waiver will promote system innovation, improve service delivery, reduce administrative burden, and ensure compliance during a transformational transition.

Oklahoma appreciates your consideration and stands ready to provide any additional information required.

5. ETPL Flexibility for State-Created Registered Apprenticeships

I. Background and Purpose

Under WIOA Section 122 and 20 CFR Part 680, only federally registered apprenticeship programs automatically qualify for the Eligible Training Provider List (ETPL). While states may include additional training providers, they must meet ETPL eligibility standards, including credential-timing and performance-reporting requirements.

Oklahoma is accelerating workforce development through employer-led, industry-driven strategies by expanding employer-validated, co-designed Registered Apprenticeships in line with both federally registered programs and state-developed, state-approved registered apprenticeships, including new models such as the K-12 Teacher Registered Apprenticeship, healthcare pathways, and other emerging occupations. Many of these programs:

- Do not align with federal ETPL credential timing requirements
- Do not have the multi-year performance history required for ETPL inclusion

- Award credentials on a timeline that does not neatly fit WIOA's required reporting structure

As a result, innovative RA models cannot be listed on the ETPL, limiting WIOA-funded participant access to work-based learning opportunities that lead directly to employment in in-demand occupations and slowing apprenticeship expansion.

To address this, Oklahoma requests a waiver of WIOA Section 122 and associated regulations to allow:

1. Automatic ETPL eligibility for state-developed Registered Apprenticeship programs, even when not federally registered; and
2. Flexibility in credential-timing and performance-history requirements for all Registered Apprenticeships during initial implementation and scale-up.

This waiver directly supports DOL's national apprenticeship priorities and aligns federal directives to expand RA access.

II. Legal Basis for Waiver Authority Under WIOA

This waiver request concerns flexibility under:

- WIOA Section 122(a)–(c) (ETPL provider eligibility, reporting, and performance criteria), and
- 20 CFR §§ 680.400–680.530 (ETPL regulations, including apprenticeship provider eligibility).

WIOA allows waivers when they support innovation, expand access, and improve outcomes. Consistent with ETA guidance, the State does not seek to waive participant protections, nondiscrimination rules, or reporting of performance data once available. Instead, Oklahoma seeks to adjust administrative requirements that unintentionally inhibit RA expansion. These flexibilities are necessary to ensure federal workforce investments are directed toward employer-validated pathways with clear labor market destinations, consistent with federal workforce strategy.

III. Justification for the Waiver

A. Barriers Created by Current ETPL Requirements

1. Automatic eligibility applies only to federally registered programs.

State-created RAs, designed in collaboration with employers, K–12 systems, and sector partners are structurally equivalent to federally registered RAs and are employer-validated pathways tied to specific, hard-to-fill occupations with documented hiring demand, but fall outside the federal registration system despite being high-quality, employer-driven pathways.

Oklahoma will apply quality assurance, ongoing monitoring, and performance accountability expectations to state-developed Registered Apprenticeship programs comparable to those applied to other apprenticeships and work-based learning investments supported through the workforce system.

2. Credential-timing rules are misaligned with RA structure. Apprenticeships often award credentials:
 - only upon completion of multi-year programs,
 - only after competency demonstration, or
 - after external licensure processes.

This makes the standard ETPL “credential within the program period” requirement infeasible or irrelevant. Current ETPL credential-timing requirements do not align with apprenticeship and work-based learning models, which award credentials based on demonstrated competency, completion of on-the-job learning, or post-program licensure. These models are explicitly supported under Pillar II: Worker Mobility of the U.S. Department of Labor’s America’s Talent Strategy, which emphasizes stackable credentials, recognition of demonstrated skills, and advancement without requiring retraining or reenrollments and are validated by employer demand rather than academic calendar structures.

3. Performance-history requirements delay participation. New RAs cannot produce two years of WIOA-style performance outcomes immediately, blocking them from the ETPL during early implementation and scaling in response to employer demand.

These barriers slow down expansion of priority sectors critical to economic competitiveness and workforce resilience, including teaching, healthcare, IT, manufacturing, and other high-demand industries while also reducing WIOA participants’ access to apprenticeship pathways.

B. How the Waiver Advances Federal Priorities

The waiver aligns directly with U.S. DOL priorities to:

- Direct WIOA investments toward employer-validated, work-based pathways with clear job outcomes
- Expand Registered Apprenticeships nationwide
- Accelerate adoption of competency-based and hybrid RA models
- Increase access to non-traditional and high-demand RA occupations
- Strengthen WIOA integration with apprenticeship programs

Enabling state-created RAs to access ETPL resources expands training access, increases equity by enabling WIOA participants to access paid, employer-sponsored pathways that lead directly to employment and advancement, and directly supports the Administration’s goals. This waiver ensures that high-quality, employer-validated Registered Apprenticeship programs are not excluded from WIOA-funded training opportunities solely due to administrative timing or reporting constraints.

IV. Proposed Waiver Terms and Conditions

The State requests authority to:

1. Automatically include state-created Registered Apprenticeships on the ETPL. State-developed RAs approved by the State Apprenticeship Agency (SAA) and validated by

participating employers as aligned to in-demand occupations would be treated equivalently to federally registered RA sponsors.

2. Modify credential-timing requirements for RAs. Allow credentials to be counted as “earned” even when awarded:
 - at the point of RA completion,
 - after licensure or certification processes, or
 - after occupation-specific assessments.

This eliminates conflict between WIOA timing rules and apprenticeship credentialing norms.

4. Waive or relax performance-history requirements during early implementation. Permit “initial eligibility” for new RAs with interim measures such as employer commitments, apprentice placement rates, and completion benchmarks used until full reporting requirements can be phased in as the program matures.
5. Allow flexible reporting that aligns with RA training structures. Accept RA sponsor reporting formats that align with federal RA systems and are simple, interoperable, and designed to drive adoption and timely decision-making, consistent with both Pillar II and federal RA reporting systems.

V. Anticipated Impact & Benefits for Job Seekers, Employers, and the Workforce System

1. Expanded training access to paid, work-based learning pathways that lead directly to employment and career advancement for WIOA participants.
2. More apprenticeships, especially teacher, healthcare, and high-demand occupations, become eligible for WIOA support.
6. Increased equity and access in underserved community’s teacher apprenticeship pathways especially expand opportunities in rural, low-income, and hard-to-staff districts.
7. Faster RA growth waiving restrictive rules accelerates employer adoption and program approval.
8. Stronger alignment between WIOA and apprenticeship system. A unified pathway creates a simplified, modernized system for training investment.
9. Improved reemployment and advancement outcomes as participants build stackable skills, earn portable credentials, and move more quickly into higher-wage roles.

VI. Conclusion & Request

If approved, Oklahoma will:

- Continue to collect and report performance outcomes once available
- Ensure all RA programs meet quality, safety, and accessibility standards
- Maintain all required WIOA participant protections
- Monitor RA sponsor performance and remove programs that fail to meet required benchmarks
- Conduct annual ETPL review consistent with state policy

The State respectfully requests this apprenticeship-specific ETPL waiver to allow:

1. Automatic ETPL inclusion for state-developed RA programs, and
2. Flexibility in credential-timing and performance-history requirements for all RAs during expansion.

This waiver will ensure federal workforce investments are directed toward employer-validated, work-based pathways with clear labor market destinations, enabling faster hiring, stronger worker mobility, and a more responsive workforce system aligned with federal priorities.

Oklahoma is prepared to provide any additional information or assurances needed to support this request.

6. Local Area Designation – Single Local Workforce Development Area

I. Background and Purpose

This waiver requests flexibility under the Workforce Innovation and Opportunity Act (WIOA) to allow Oklahoma to operate as a single statewide local workforce development area, with governance, policy, fiscal oversight, and performance accountability administered at the state level.

Oklahoma's request is not based on fiscal noncompliance, performance failure, or statutory deficiency within its current local workforce development areas. On the contrary, the State's existing local areas have generally demonstrated fiscal integrity and met baseline performance requirements under WIOA. However, Oklahoma has determined that continued operation of multiple local workforce development areas no longer represents the most effective governance structure to meet the State's workforce, economic, and labor market needs.

While Oklahoma is implementing its workforce system transition consistent with existing statutory and regulatory authority, this waiver is requested to provide federal clarity regarding the application of local area redesignation criteria during the State's transition to a single statewide local workforce development area.

Formal consultation with Chief Local Elected Officials and local workforce leadership regarding the Governor's intent to designate Oklahoma as a single statewide local workforce development area has already occurred pursuant to WIOA Section 106.

While the State has engaged in formal consultation with Chief Local Elected Officials and local workforce leadership, WIOA Section 106 vests local area designation authority in the Governor following consultation. The State has determined that a single statewide local workforce development area is necessary to advance its workforce system objectives.

This waiver is intended to ensure continuity of services, system stability, and administrative clarity regarding the application of local area designation and redesignation requirements in the context of statewide governance restructuring.

Oklahoma's goals in requesting this waiver are to:

1. Confirm federal approval for operating as a single statewide local workforce development area under WIOA;

2. Ensure uninterrupted delivery of workforce services during and following system restructuring;
3. Eliminate structural fragmentation inherent in maintaining multiple local workforce development areas;
4. Avoid legal, administrative, or monitoring challenges that may arise from applying prescriptive local area designation criteria to a statewide governance model; and
5. Support a governance structure that aligns with Oklahoma's labor market realities, service delivery strategy, and Unified State Plan priorities.

II. Legal Basis for Waiver Authority Under WIOA

Legal Authority

This waiver is requested pursuant to Section 189(i)(3) of the Workforce Innovation and Opportunity Act (WIOA), codified at 29 U.S.C. § 3249(i)(3), and implemented at 20 CFR § 679.610, which authorize the Secretary of Labor to waive statutory or regulatory requirements of Title I of WIOA, except for those explicitly excluded from waiver authority.

The waiver relates to statutory and regulatory provisions governing the designation and redesignation of local workforce development areas, including:

- WIOA Section 106, codified at 29 U.S.C. § 3121; and
- Implementing regulations at 20 CFR §§ 679.210 through 679.280.

This request seeks flexibility in the application of statutory and regulatory redesignation provisions as implemented through 20 CFR §§ 679.210–679.280 during statewide restructuring and does not seek to waive performance accountability, fiscal integrity standards, or appeal rights.

III. Justification for the Waiver

A. Actions Taken to Remove Barriers

Oklahoma has undertaken the following actions to support its transition to a single statewide local workforce development area:

- Conducted a comprehensive review of state statutes, administrative policies, and workforce governance structures to ensure alignment with WIOA requirements;
- Evaluated the performance, fiscal integrity, and administrative capacity, and governance consistency of existing local workforce development areas;
- Engaged in sustained cross-agency planning to align workforce governance with education, economic development, and human service partners; and
- Provided formal consultation and written notice to Chief Local Elected Officials and Local Workforce Board Directors regarding the Governor's intent to designate Oklahoma as a single statewide local workforce area.

These actions demonstrate that the State's request is not corrective in nature, but rather a proactive governance decision. This request reflects a policy determination by the State regarding optimal governance structure rather than a consensus-driven decision among existing local governance entities.

However, federal statutory and regulatory requirements governing local area redesignation were developed to protect high-performing local areas and do not expressly address voluntary statewide consolidation initiated by a Governor. Accordingly, this waiver is necessary to ensure full flexibility and legal certainty for a single-area model.

This waiver does not eliminate the subsequent designation framework under WIOA Section 106(c)(3). Rather, it clarifies that during a Governor-initiated statewide consolidation, the prescriptive redesignation criteria may be applied in a manner consistent with the State's authority to designate a single statewide local workforce development area.

B. Notice to Local Boards and Opportunity to Comment

On January 27, 2026, the Governor of Oklahoma issued formal written consultation and notice to Chief Local Elected Officials and Local Workforce Board Directors regarding the State's intent to designate Oklahoma as a single statewide local workforce development area.

Local elected officials, workforce boards, and other stakeholders will continue to be provided opportunities to comment through the WIOA State Plan modification process, including the public comment period required under WIOA and implementing regulations.

The consultation process provided an opportunity for local feedback; however, the State retains responsibility for determining governance structures that best serve statewide workforce and economic priorities.

C. Evidence Supporting Waiver

Internal analyses indicate that, despite local compliance and performance, maintaining multiple local workforce development areas results in:

- Structural duplication across governance, procurement, and administrative functions;
- Employer confusion due to multiple points of entry and inconsistent engagement strategies;
- Regional variation in service models that limit statewide scalability; and
- Elevated administrative costs associated with maintaining multiple boards and parallel infrastructures.

These findings do not reflect deficiencies at the local level; rather, they demonstrate that the multi-area governance model itself imposes structural inefficiencies that cannot be fully addressed through policy alignment alone. In a multi-area governance environment, differing local priorities and perspectives can limit the State's ability to implement uniform policy, fiscal, and service delivery decisions at the pace and scale required by statewide initiatives.

As Oklahoma undertakes broader workforce system transformation, including statewide service delivery alignment and integrated access models, these structural constraints pose increasing risk to timely and consistent implementation.

This waiver directly supports Oklahoma's Unified State Plan goals related to:

- Integrated and coordinated service delivery across programs and regions;
- Reduction of administrative fragmentation and duplication;
- Consistent statewide policy implementation; and
- Clear, centralized accountability for workforce outcomes.

D. How the Waiver Advances Federal Priorities

The waiver aligns with the U.S. Department of Labor's workforce priorities, including America's Talent Strategy:

Pillar I – Industry Driven Strategies

Aligns workforce governance with Oklahoma's statewide economic development ecosystem rather than legacy geopolitical boundaries.

Pillar II – Worker Mobility

Improves access to standardized quality of services across the state, supporting participant mobility and occupational advancement.

Pillar III – Integrated Systems

Directly supports a unified statewide workforce governance and service delivery system.

Pillar IV – Accountability

Establishes a centralized line of fiscal and performance accountability at the state level consistent with WIOA requirements. A single-area governance model ensures that responsibility for outcomes rests clearly with the State, enabling timely decision-making where governance perspectives differ.

Pillar V – Flexibility & Innovation

Utilizes statutory waiver authority as a tool to modernize workforce governance away from its current siloed approach in response to evolving economic conditions.

A single-area governance model also strengthens employer engagement, education and training alignment, work-based learning scalability, and job placement and advancement outcomes by enabling coordinated statewide strategies unconstrained by jurisdictional boundaries.

IV. Anticipated Impact

All workforce participants in Oklahoma will be served within a single statewide local workforce development area. Approval of this waiver will not reduce access to services, eligibility, or service quality.

Rather the waiver will improve consistency, coordination, and service delivery, particularly for individuals with multiple barriers to employment who benefit from integrated, cross-program approaches.

Approval of this waiver will:

- Streamline governance and clarify lines of authority;
- Reduce duplicative administrative functions and redirect allowable resources toward participant services and training investments;
- Improve consistency in service delivery across the state;
- Create employer clarity through a statewide entry point for Oklahoma's key industries including aerospace, energy, and healthcare; and
- Standardize service quality through enhanced alignment with statewide economic and workforce priorities.

These changes are expected to strengthen accountability, improve program outcomes, and support more effective use of workforce resources statewide. While governance transitions inherently involve differing perspectives, centralized accountability will enable more consistent implementation and clearer resolution of policy and operational issues.

V. Proposed Waiver Terms and Conditions

If approved, Oklahoma commits to:

1. Maintaining all required workforce partner roles and funding obligations under WIOA Section 121.
2. Continuing to provide universal access to all required WIOA services in each region of the state.
3. Maintaining nondiscrimination, accessibility, and physical/virtual access requirements.
4. Not reducing the quality or availability of services as a result of this waiver.
5. Maintaining a compliant process for any entity seeking designation as a local area, including written requests, review criteria, written decisions, and appeal rights. Appeal rights will extend to the Secretary of Labor in accordance with WIOA and 20 CFR Parts 679 and 683.
6. Monitoring implementation through existing WIOA oversight, fiscal monitoring, and performance accountability processes administered at the state level. Outcomes will be reported through Oklahoma's WIOA Annual Report and other required federal reporting mechanisms.
7. Governance, policy, fiscal oversight, and performance accountability will be administered at the state level through:
 - Oklahoma Employment Security Commission (as the administrative authority)
 - Governor's Council for Workforce and Economic Development (as the single area local board)

VI. Conclusion & Request

Approval of this waiver will provide Oklahoma with the legal certainty necessary to operate as a single statewide local workforce development area, while maintaining full compliance with WIOA fiscal, performance, and accountability requirements.

The waiver supports a governance structure that reflects modern labor markets, reduces administrative fragmentation, and strengthens integrated, outcome-driven workforce service delivery. Oklahoma respectfully requests approval and stands ready to provide any additional information required.

Oklahoma remains committed to full compliance with WIOA statutory requirements and seeks this waiver solely to clarify application of redesignation provisions during statewide governance restructuring.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes

The State Plan must include	Include
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction

with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);

- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	73.5%		73.5%	
Employment (Fourth Quarter After Exit)	73.5%		73.5%	
Median Earnings (Second Quarter After Exit)	\$7,677		\$7,677	
Credential Attainment Rate	73.5%		73.5%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Measurable Skill Gains	69.2%		69.2%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each

of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	75.7%		75.7%	
Employment (Fourth Quarter After Exit)	75.0%		75.0%	
Median Earnings (Second Quarter After Exit)	\$10,000		\$10,000	
Credential Attainment Rate	82.5%		82.5%	
Measurable Skill Gains	71.0%		75.0%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as

“baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	76.5%		76.5%	
Employment (Fourth Quarter After Exit)	79.0%		76.0%	
Median Earnings (Second Quarter After Exit)	\$6,162		\$6,162	
Credential Attainment Rate	65.0%		65.0%	
Measurable Skill Gains	72.8%		72.8%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE STAFF

1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

Oklahoma will continue to staff the provision of labor exchange services using state merit staff employees.

2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

OESC understands the importance of continuous improvement and meets quarterly to determine training needs, review national program requirements, system and procedure matters, and other service delivery development opportunities.

OESC believes strongly in the WIOA partnership and sends staff to annual partner conferences and other state or national opportunities to learn about and weigh in on critical system initiatives. We will continue to review and strengthen our professional development approach and customer product box so staff will be best positioned to provide adequate resolution at the first point of customer contact.

3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

The following types of training have been and will continue to be provided to Center staff to assist with identification of potential UI eligibility issues and referral to UI for adjudication:

- What kinds of issues create eligibility problems for those claimants receiving UI? Some of the common UI issues covered in training: a) Ability to work; b) Availability to seek and accept work; c) Refusal of a job referral; d) How to report acceptance of employment; and e) Failure to report for a scheduled, required reemployment session.
- What kind of information is important to gather when it comes to “fact-finding” about potential UI issues? Some of the common topics covered in training: a) Instruction to all staff on how to conduct quality fact-finding when taking statements for UI purposes; and b) Instruction on how to add issues to or report issues about claims so they will be assigned to an Adjudicator for further investigation and subsequent determination.
- What are the processes for reporting issues and subsequent Adjudication procedures? a) Information about reporting potential issues to UI staff such as using specified forms and emailing specified departments; b) Information on the Adjudication processes for

reemployment services such as call-ins being sent to obtain claimant information when the claimant fails to report, when denials are issued on a claim, length of disqualifications; etc. c) Information on the process to be followed when a claimant reports to a required reemployment service after a disqualification has been issued.

- What are the steps to validate claimant identity? Center staff assist UI claimants with Identity Verification which is an integral part of the UI claims process. Staff members have been trained in the types of acceptable documents and how to identify non-legitimate or questionable documents.

We have launched a partnership between ES Staff in the American Job Centers and our UI Contact Center, in which several ES Center staff have received the same level of extensive training provided to UI Contact Center staff. This has expanded the capability of our ES Centers to provide a greater level of claims resolution to UI claimants visiting our centers. The trained ES Center staff are embedded in UI Contact Center operations on a regular cadence to foster the expansion and retention of UI expertise. Conversely, UI Contact Center staff have been trained to identify when UI claimants are out of compliance with the work registration requirements in the state MIS and can walk the claimant through the registration process.

In addition, reference material is provided to Center Staff and One-Stop Operators and/or Managers to provide supplemental training to an integrated staff through weekly Center meetings. This detailed approach fosters an environment for knowledge growth and continues to keep Oklahoma focused on service delivery as defined by WIOA.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE

Oklahoma continues its support of unemployed individuals by providing trained, knowledgeable, integrated staff members to help the customer through the claims filing process while leveraging technology. OESC has transitioned all initial unemployment insurance claims to an online platform to ensure more meaningful assistance is provided through support staff throughout the America Job Centers in Oklahoma. Meaningful assistance applies in every scenario where we communicate with an unemployed individual with the following staff-assisted services:

- Informing claimants of their right to an Appeal. This may also include showing the claimants where/how to file.
- Providing resume assistance and/or guiding the claimant through their responsibility to register for work – Staff may provide the customer with step-by-step guidance on the EmployOklahoma resume builder and/or help the claimant create a resume appropriate for upload. Any resume service should result in one or more soft or hard copy resume options of superior quality.
- Informing claimants of their right to receive (and signing them up for) other reemployment services such as the various job seeker skills development workshops or working with the claimant to create a detailed reemployment plan.

- Giving the customer information about their responsibility to search for work including where to find and how to fill out their work search log and/or advising customers on what constitutes an allowable work search item.
- Informing the customer about their responsibility to keep all scheduled appointments and return all requested documentation.
- Guiding the claimant through LinkedIn registration or other appropriate social media and job search tools that aid them in performing their work search responsibilities. In addition, ensuring claimants take advantage of getting EmployOklahoma notifications of available jobs.
- Assistance with the filing of initial or weekly claims. This means sitting down with the customer and walking them through the Online Network Initial Claims (ONIC) online filing tool and pointing out the various self-service information options available to them.
- Informing the customer about their responsibility to accept offers of suitable work.

For those claimants who are Limited English Proficient, the online claims system has a language translator. Center staff can assist the customer in accessing the translator or using language lines to assist such individuals during the claims filing process. OESC has also enhanced our individual voice response system with Spanish and Vietnamese translations. For those individuals who are deaf or hard of hearing, TTY services are also available.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

In addition to other career services in the Oklahoma Works centers, Oklahoma provides Reemployment Services and Eligibility Assessment services to help Unemployment Insurance (UI) claimants and/or unemployed individuals return to work more quickly.

RESEA Reemployment Services and Eligibility Assessment (RESEA) is an individualized, one-to-one reemployment-focused process that provides reemployment services to claimants who are unlikely to return to their previous industry or occupation and who have been deemed likely to exhaust benefits. The RESEA program came into existence when it replaced the voluntary Unemployment Insurance (UI) Reemployment and Eligibility Assessment (REA) program that began in 2005. The RESEA program provides greater access to reemployment services in addition to the services previously provided by REA. In Fiscal Year 2018, amendments to the Social Security Act permanently authorized the RESEA program and implemented significant changes to the program. The permanent RESEA program has four purposes.

1. Reduce UI duration through improved employment outcomes,
2. Strengthen UI program integrity,
3. Promote the alignment of the vision of the Workforce Innovation and Opportunity Act (WIOA),
4. Establish RESEA as an entry point to other workforce system partners.

The RESEA program targets UI claimants determined to most likely exhaust benefits and former U.S. military service members receiving Unemployment Compensation for Ex-service members (UCX). The permanent authorization of the RESEA program gives Oklahoma the flexibility to

target any UI and UCX recipient. In addition to those who are most likely to exhaust benefits, we also target recipients in declining Industries. Claimants who are eligible for the program are identified early in the claim's series and remain eligible for the program until they receive their fifth week of UI benefit. Once selected the claimant's participation in RESEA is mandatory and failure to complete service may affect the claimant's UI benefits.

RESEA services are administered through Oklahoma Works American Job Centers and are an entry point into the One-Stop System. Participants selected for RESEA will receive an individualized appointment with AJC staff to assist them with returning to work quickly. Services provided by staff include but are not limited to an online Orientation to Reemployment Services video; Reemployment Needs Inventory & Eligibility Review; Assessment of a claimant's skills and career goals and assistance with establishing employment goals; Individual Reemployment Plan; resume assistance; Labor Market Information and Job referral; Referral to appropriate reemployment services; and 30-day Follow-up appointment. Appointments are conducted in person but may be completed virtually or by phone due to extenuating circumstances. In addition to these required services, RESEA participants are eligible to receive all available services provided by AJC to assist them with reentering the workforce.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

The Oklahoma Employment Security Commission (OESC) complies with this requirement to use Wagner-Peyser funds to support UI claimants. In Oklahoma, both the Unemployment Insurance Program and Wagner-Peyser are administered by the same agency, OESC. Labor exchange services are provided to all customers accessing the workforce centers by Wagner-Peyser staff. There is a special emphasis placed on serving UI claimants to help connect them back to work as quickly as possible.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

In Oklahoma claimants must register for work in the state labor exchange system within seven days of filing their initial claim. Claimants are informed both when they file online and when they file via the Interactive Voice Response (IVR) system that they must complete the registration for work within the seven-day requirement. Claimants are required to read and acknowledge understanding of the Benefit Rights Interview (BRI), which has information regarding work registration, before completing their claim. If a claimant does not comply with this requirement, benefits will not be awarded until the requirement has been met. Any week(s) filed before compliance with the registration requirement are considered ineligible and will not be paid.

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

Claimants in Oklahoma must now file their initial claims online via the Oklahoma Claimant Portal system; however, they may file their continued weekly claim to receive benefit payment by telephone via the Interactive Voice Response (IVR) system or online.

To improve the online experience, Oklahoma has enhanced its online service delivery around unemployment claims. The online service options for claimants are:

1. File your initial claim.
2. File your weekly claim for benefit payment.
3. Inquire about an existing claim.
4. Request a 1099.
5. Change your contact information i.e., address, phone number, and email.
6. Change your PIN.
7. File your appeal.

Claimants can also access frequently asked question documents, appeal information, the Reemployment Assistance for the Unemployed booklet, the work search form, and critical information about their debit card. Through both filing processes potential eligibility issues are identified based on the claimants' responses to questions during the application for benefits process.

The following types of training have been and will continue to be provided to AJC staff to assist with identification of potential UI eligibility issues and referral to UI for adjudication:

1. **What kinds of issues create eligibility problems for those claimants receiving UI?**
Some of the common UI issues covered in training:
 - a. Ability to work.
 - b. Availability to seek and accept work.
 - c. Refusal of a job referral.
 - d. How to report acceptance of employment.
 - e. Failure to report on a scheduled, required reemployment session.
2. **What kind of information is important to gather when it comes to "fact-finding" about potential UI issues?** Some of the common topics covered in training:
 - a. Instruction to all staff on how to conduct quality fact-finding when taking statements for UI purposes; and
 - b. Instruction on how to add issues to or report issues about claims so they will be assigned to an Adjudicator for further investigation and subsequent determination.
3. **What are the processes for reporting issues and subsequent Adjudication procedures?**
 - a. Information about reporting potential issues to UI staff such as using specified forms and emailing specified departments.
 - b. Information on the Adjudication processes for reemployment services such as call-ins being sent to obtain claimant information when the claimant fails to report, when denials are issued on a claim, length of disqualifications; etc.
 - c. Information on the process to be followed when a claimant reports to a required reemployment service after a disqualification has been issued.

In addition to enhancing service delivery and customer service for individuals experiencing unemployment, reemployment continues to be a priority for Oklahoma. OESC has modified and enhanced services to claimants to ensure the registration for the work requirement is met along with required attendance at and completion of other reemployment assistance services. UI claimants receive reemployment information throughout their claims process including but not limited to; information on available services in Oklahoma Works Centers, resume assistance, job referrals, job search workshops, work search review, and access to skills-based training.

Additionally, Oklahoma has incorporated within our employer customer service line, a main menu option, specifically for employers as an available avenue for employers who wish to report UI claimants who have refused work or failed to return to work following a temporary layoff. Regardless of the point of entry for the claimant, the result continues to be reemployment.

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

Within the Oklahoma workforce development system, known as Oklahoma Works, is a network of Centers or One-Stop offices where employment, education, and training providers integrate services to assist both job seekers and employers. Job Seeker customers receive assistance preparing for and searching for work, making career decisions, and accessing training opportunities.

Most people who walk into an Oklahoma Works Center are in search of information such as where the job openings are located, what training opportunities exist, or what kinds of community services are available. They may also need a computer, phone, or fax.

These core services are available to everyone through the Centers, usually with limited assistance. There are full-service, comprehensive “Resource Rooms” set aside for self-help, or limited assistance, much like a community library. There are computers and software for customers to prepare a resume, for instance, with books, videos, and even staff nearby to answer basic questions or give limited guidance.

During center orientations, customers receive information regarding workforce services, programs, and partner resources. This includes information about internal and external training and educational programs, including referrals to WIOA. Customers have access to resources and handouts. Online, customers may research information about different training programs within their community, statewide, and nationally. Oklahoma Works Center representatives provide individualized information and resources that assist the customer in making the most informed choice.

For those individuals who require more in-depth assistance, Oklahoma requires applicants to complete questionnaires that will assist us in determining what services will best fit the customer’s needs and which agencies or partners will be best equipped to meet such needs. The customer and the Center staff will discuss items like background, education and/or certifications, experience and work history, skills, etc., and then map out a strategy to get the customer on a career or training path. The information that is obtained creates a “snapshot” of potential program eligibility thus allowing Center staff to make proper referrals to additional programs or resources.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

Oklahoma continues to seek identification of the Migrant and Seasonal Farmworker (MSFW) population. Potential exclusion from public program benefits such as unemployment and the fear of displacement and potential deportation results in mistrust and hesitancy, making locating and assessing the needs of this population difficult. According to the last available Census of Agriculture in 2022, Oklahoma had a total of 644 migrant workers, not including family members. Based on data obtained by outreach workers, the main needs of our MSFW population are gaining access to the services offered by the state and other partnering agencies. These services include training, education, access to health care, insurance, and transportation. Lack of identification and contact makes it difficult for MSFW's to take advantage of available resources. Several factors contribute to this issue. MSFWs who are willing to seek out services are rarely provided transportation to be able to come to the nearest town, much less the nearest American Job Center (AJC). Additionally, the business hours of the AJC do not align with the MSFWs non-working hours, so outreach efforts are focused on bringing the needed information to the MSFW in the fields and communities where they live or gather. Another area that needs work is bringing outreach to workers during their free time, as the employers are not usually able to offer enough time for outreach workers to register MSFW's or identify which services the MSFW may need.

2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

The following information regarding Oklahoma agriculture was obtained from the 2022 Oklahoma Agricultural Statistics, issued cooperatively by the National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry. (This is a summary of data through 2022 which is the latest data available.)

1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity:

Most major crops in Oklahoma are no longer considered labor-intensive except watermelon. Increased mechanization/technology, herbicides, and genetically superior seeds/plants have continued to greatly reduce the need for vast numbers of laborers as in years past. However, specialty crops/livestock-related products and vegetables/produce for Farmers' Markets are increasingly providing labor-intense work opportunities. Others have pursued some of these new ventures such as Grass-fed dairy/beef, free-range chicken, and the revitalization of sheep for meat, wool, and wool products. The leading agricultural activities in Oklahoma are:

Agricultural Product	Farms	Sales (\$1,000)	Percent of Total Sales
Cattle and calves	45,471	\$7,473,764	1.4%
Grains, oilseeds, dry beans, and dry peas	8,585	\$1,770,612	1.0%
Poultry and eggs	6,614	\$3,174,063	1.1%
Hogs and pigs	1,866	\$2,190,742	0.2%
Other crops and hay	14,503	\$334,587	8.9%
Nursery, green house, floriculture, and sod	679	\$511,162	0.2%
Milk from cows	263	\$448,154	0.3%
Cotton and cottonseed	1,030	\$277,937	0.5%
Horses, ponies, mules, burros, and donkeys	3,840	\$88,423	8%
Fruits, tree nuts, and berries	2,172	\$52,011	0.8%
Vegetables, melons, potatoes, and sweet potatoes	617	\$57,877	3%
Sheep, goats, wool, mohair, and milk	3,713	\$28,892	17%
Other animals and other animal products	1,228	\$30,179	8%
Aquaculture	45	\$9,510	0.9%
Cultivated Christmas trees and short rotation woody crops	43	\$1,758	8%

The table below details the heaviest crop activity related to planting and harvesting during the 12-month calendar year beginning with January and going through December. The frost-free period is from mid-April until the 3rd week of October.

Crop	Planting	Harvest
Winter Wheat:	Early Sep to Early Nov	June to Early July
Canola:	Early Sep to Early Oct	Mid-May through June
Spring Oats:	Mid Feb to March	June to Mid-July
Corn:	Late March to Mid-May	Mid Aug to Late Oct
Soybeans:	Mid-April to Mid-July	Mid Sep through Nov
Sorghum:	Mid-April to Mid-July	Mid Sep through Nov
Peanuts:	Late April to Mid-June	Oct to Nov
Sunflowers:	May to July	Aug to Mid Dec

Cotton:	May to Late June	Oct through Dec
Alfalfa Hay:		Late April to Mid Oct

Oklahoma is most easily divided between west and east concerning agricultural activity. WESTERN OKLAHOMA is a predominant supplier of wheat, sorghum, canola, peanuts, cotton, corn, and alfalfa. EASTERN OKLAHOMA is a predominant supplier of soybeans, hay, and corn.

2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce):

According to various sources, most agricultural employers appear to have no major issues finding local workers to perform work around the farms. They enlist family members and friends and utilize word of mouth advertising in their hiring practices. However, data collected from the States Foreign Labor Certification Department shows that the H-2A Program continues to grow each year at a rate of approximately 12.5%.

3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State:

Oklahoma is found in the Great Plains; geographically centered within the 48 contiguous states and the 20th largest at 69,903 square miles. Ecosystems range from dry, arid plains to subtropical forests and mountains, having more ecological regions than any other state. Elevations range from 4,368 feet above sea level in the western panhandle to 289 feet above sea level in the southeast portion of the state. The mean elevation of Oklahoma is 1,300 feet above sea level. Because of Oklahoma's location between regions of varying prevailing winds, its climate, temperatures, and weather, it makes for extreme variance in a locality's weather from day-to-day and extreme change between areas in proximity. Because of this, an average of 62 tornados a year, drought, flood, extreme temperature variations and unpredictable weather in general, Oklahoma farmers deal with very unpredictable seasons, making for constantly changing plans for raising and changing crops and livestock to turn a profit. Average annual precipitation ranges from 18" over 59 days in the western portion of the state to 51.9" over 96 days in the eastern portion of the state. Frost free periods in the western portions are typically about 143 days and 185 days in the eastern portion.

3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

Oklahoma's foreign MSFWs are primarily from Mexico and other South American countries. The primary language spoken by MSFWs is Spanish, with English frequently being a primary or secondary language.

A review of Oklahoma's Foreign Labor certification program data from October 1, 2021, to September 30, 2022, finds that H-2A posted 950 of their 1,316 openings during our peak hiring season (October through March), representing almost all the positions posted.

Reviewing O*Net Online 10 years, 2014-2024, predictions, agricultural positions in Oklahoma will show some growth and some loss:

- 45-2091.00 Agricultural Equipment Operators +2%
- 45-2092.00 Farmworkers and Laborers, Crop, Nursery, and Greenhouse -8%
- 45-2093.00 Farmworkers, Farm, Ranch and Aquacultural Animals +5%
- 45-2041.00 Graders and Sorters, Agricultural Products -7%.

4. OUTREACH ACTIVITIES

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

Although Oklahoma is not designated as a significant MSFW state due to the low percentage of MSFWs identified, the state continues to improve outreach efforts. Oklahoma has three designated outreach workers, one full-time Outreach Coordinator covering the entire state and backing up the two part-time outreach workers, one located in the Western part of Oklahoma and the other located in the Eastern part of the state; all to provide services that are qualitatively equivalent and quantitatively proportionate to services provided to other jobseekers.

The strategy for utilizing the full-time Outreach Coordinator is to provide consistency, build trust, and create relationships with the MSFWs and their employers.

The MSFW community faces many hurdles in being able to visit the American Job Center due to the hours worked, lack of transportation, and a general mistrust of governmental agencies. The state's strategies to locate and serve farmworkers include:

Agricultural Outreach Group – meets quarterly to discuss available services, and upcoming outreach events, and identify the most pressing or newest needs of the MSFW community. The group includes multiple federal, state, and local agencies, as well as various community partners.

Quarterly Training Programs – for all workforce system stakeholders include program knowledge, how to identify MSFWs, service needs, and resource agencies. *(see more detail in the next section)*

Flyers and Electronic Media/Tools – to ensure equitable access to services and information, are provided in English and Spanish with provisions for meeting other English Language Learner or English as a Second Language needs.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES

Although Oklahoma is not designated as a significant MSFW state due to the low percentage of MSFW's identified, the state continues to improve outreach efforts. Oklahoma has three designated outreach workers, one full-time Outreach Coordinator covering the entire state and

backing up the two part-time outreach workers, one located in the Western part of Oklahoma and the other located in the Eastern part of the state; all in an effort to provide services that are qualitatively equivalent and quantitatively proportionate to services provided to other jobseekers.

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Quarterly Training Programs – for all workforce system stakeholders including program knowledge, how to identify MSFWs, service needs, and resource agencies. *(see more detail in the next section)*

Flyers and Electronic Media/Tools – to ensure equitable access to services and information, are provided in English and Spanish with provisions for meeting other English Language Learner or English as a Second Language needs.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE AND EMPLOYMENT-RELATED LAW COMPLAINT SYSTEM (“COMPLAINT SYSTEM” DESCRIBED AT 20 CFR 658 SUBPART E), INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWS IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

The SMA and Outreach Coordinator are partnering with the State Workforce Agency's (SWA) Training Department to develop on-demand, eLearning materials that include, but are not limited to: program knowledge, how to correctly identify MSFWs, service needs, and resource agencies, making agricultural employer or jobseeker contacts, job order requirements, referrals to posted jobs and all center services, worker rights, the complaint system, unemployment insurance information, and sexual harassment/human trafficking. These eLearning modules will address past and current regulatory requirements found in 20 CFR Part 653 and will be extended to all workforce system partners, programs, and other stakeholders including those at the community and federal levels.

The SWA will continue to evaluate partnerships with: the Oklahoma Department of Education, the Oklahoma Departments of Labor, an MOU with the US Department of Labor Wage and Hour Division, local Workforce Development Boards, the Mexican Consulate, Legal Aid of Oklahoma, the Department of Agriculture and cultivate new partnerships as opportunities arise.

New contacts being sought beginning in PY23 include various health-related organizations, OSHA, the US Department of Justice, the Environmental Protection Agency, the Centers for Disease Control, and Health & Human Services. The SMA and full-time Outreach Coordinator are collaborating with the Red Cross and Catholic Charities to establish 24-hour emergency procedures to assist MSFWs who may find themselves stranded or needing immediate assistance outside of normal working hours.

C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES

The SWA's on-demand, eLearning approach extends to other core programs in the workforce system including the Unemployment Insurance (UI) program and UI eligibility. This training will address items such as eligibility, program services and benefits, how-to-apply, and who to contact for further assistance.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBBEERS AND EMPLOYERS

The SWA's on-demand, eLearning approach also extends to the training and development of state merit staff outreach workers. National professional development opportunities such as WIOA related training, continuing education, webinars presented by the National Monitor Advocate, and other relevant training or informational events will be attended by the full-time Outreach Coordinator, within the limits of available resources, and will be shared train-the-trainer style with the part-time outreach staff and other AJC partners and staff as appropriate. In addition, the outreach workers are all permanent members of the Agricultural Outreach Group.

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEE AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

Oklahoma currently has no NFJP partner.

Outreach efforts and information sharing happen through the Agricultural Outreach Group consisting of members from the Department of Labor Wage & Hour Division, Occupational Safety & Health Administration, Oklahoma Department of Agriculture, University of Oklahoma, Variety Care, Oklahoma Department of Labor, Legal Aid Services of Oklahoma, Oklahoma State Department of Education, Oklahoma Safety Council, Guatemalan Consulate, OKC Hispanic Chamber of Commerce, and the Mexican Consulate. Additionally, an MOU between the USDOL Wage and Hour Division and OESC serve as another example of the state's efforts in the areas of outreach and information, rights and protections for workers, and service delivery to MSFWs.

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

Describe the State agency's proposed strategies for:

A. PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

I. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWs THROUGH THE ONE-STOP CENTERS

II. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES

Oklahoma's strategy for providing career and training services to MSFWs through the one stop centers include:

Resources and Assistance Available in Languages Other than English – to ensure equitable access to services and information, flyers and other materials are provided in English and Spanish with provisions for meeting other English Language Learner or English as a Second Language needs through contracts with vendors such as the Language Line.

The OESC is currently translating all internal and external communications, forms, and web-based applications in Spanish and Vietnamese. In addition, bilingual staff are present in some of the one-stop-centers, eleven (11) employed by the OESC. Access to those staff is provided via video chat or telephone to serve the needs of those in other areas.

Partnerships with and Referrals to Other Programs/Agencies – Section 2.B. provides details on the vast partnerships currently in place as well as new partnerships happening in PY23. Relationship building, information sharing, and education are a core part of these partnerships that result in collaborations like the one between the SWA, the Red Cross, and Catholic Charities to establish 24-hour emergency procedures to assist with MSFWs who may find themselves stranded or needing immediate assistance outside of normal working hours.

Equitable Access and Quality Service Delivery – MSFWs are provided the same level of service as any other one-stop-center customer including but not limited to: access to job postings, referrals and job developments; training supportive services; assistance in using or accessing the State Labor Exchange System; career assessments; information on MSFW rights and protections; a system for registering complaints; information and referrals to other agencies for training and supportive services; labor market information, use of computers, phones and faxes, a variety of career workshops, resume assistance and language services. Moreover, Oklahoma's efforts to expand service delivery by meeting customers where they live and work include the MSFW population. This means they will receive equitable access to all available one-stop-center services via video chat or telephone or at another brick-and-mortar location if appropriate or necessary when getting to the one-stop-center is not feasible.

Agricultural employers receive specialized assistance in filling their job openings through compliant job orders in the State Labor Exchange System. Applicants to these jobs are screened by American Job Center staff, receiving information regarding the conditions, duties, pay, and any unique requirements of these positions. Once applicants have passed the screening portion, job referrals are made and the how-to-apply instructions are given to the applicant. Education and technical assistance relating to finding qualified applicants through the Agricultural Recruitment System, providing pre-occupancy housing inspections and assisting agents/employers with job posting requirements, providing information on the unique needs of farmworkers, and compliance with wage and hour and relevant Occupational Safety and Health Administration regulations are also available to these employers.

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS

The previously mentioned strategic approach of the full-time Outreach Coordinator position is to provide consistency, build trust, and create relationships with farmworkers themselves, employers, and other farmworker advocacy groups. This previously established connection gives the Outreach Coordinator and by association the SWA, credibility as we deliver important program information via presentations, meetings and seminars, email newsletters, the public website, etc. around workers' rights and protections, the key features of the ES complaint system, and why it is a crucial element for workers, employers, and advocacy groups.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

Oklahoma currently markets the Agricultural Recruitment System (ARS) through the SWA public website. The Oklahoma Agricultural Recruitment Handbook for employers and farmworkers is in development, and the expected completion is PY26. Once available, these handbooks will be marketed through the American Job Centers, employer associations and agents, local workforce partners and stakeholders, and the public website. Training will be provided to AJC staff on the ARS, related MSFW topics, and agricultural employer topics. Additionally, ARS information will be marketed through attachments to our Annual Wage and Hour surveys, email blasts to those employers with agricultural NAICS codes, and the public website. Training to address the specific requirements for all agricultural job orders handled by center staff is in development so that staff will be able to better communicate the advantages and requirements of the ARS.

6. OTHER REQUIREMENTS

A. COLLABORATION

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

As identified in previous sections, OESC has collaborative agreements with all three workforce development boards, and the US Department of Labor Wage & Hour Division. We are working on establishing collaborative agreements with the Guatemalan Consulate, the Mexican Consulate, and other members of the Agricultural Outreach Group.

B. REVIEW AND PUBLIC COMMENT

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their

comments have been incorporated and, if not, the reasons; therefore, and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The SWA sent an email on Wednesday, January 28, 2026 (detailed below) to stakeholders from the following organizations: OK Department of Agriculture - Market, Development, and Consumer Protection, Variety Care - Farm Worker Health, Mexican Consulate, OKDOL OSHA Industrial Hygiene, Legal Aid of Oklahoma, OESC FLC Support Staff, Guymon Nazarene Church - Legal and Immigration Services, OK Department of Human Services, OK Department of Agriculture - Made In Oklahoma Program, Oklahoma Safety Council, OU Health Sciences Center - ONE Project, Work Ready Oklahoma, USDOL Wage and Hour Division, University of Oklahoma Community Experience Coordinator, OKDOL - Child Labor Program, USDOL - OSHA, OESC Outreach Workers, OK State Department of Education - Migrant Education Program, Guatemalan Consulate, OK Family Network - Latino Family Support, USDA - Food Safety, OESC Center Managers, OK Department of Health - Minority Health, and Langston University - School of Agriculture and Applied Science.

Hello Agricultural Outreach Group Stakeholders and Friends!

Oklahoma has made required modifications to its Program Years 2024-2027, Workforce Innovation and Opportunity Act of 2014 State Plan. The U.S. Department of Labor (USDOL) guides the state plan process with questions to the states. Part of those questions pertain to the State's agricultural make-up, outreach efforts, collaboration with partners, and service delivery to Migrant Seasonal Farmworkers. These parts are collectively referred to as the Agricultural Outreach Plan (AOP). In addition, USDOL requires a "public comment" period. Attached to this email is the AOP section. Please review this information and send your feedback to MSFW@oesc.ok.gov no later than close of business February 15, 2026.

Thank you for your participation and feedback.

As of the end of the 30-day comment period, no comments or feedback were received.

C. DATA ASSESSMENT

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

A review of the past four (4) years of data from the USDOL Labor Exchange Agricultural Reporting System (LEARS) shows that Oklahoma did not meet the required levels in the area of providing MSFWs quantitatively proportionate services (a.k.a. equity indicator) as compared to non-MSFWs; however, this appears to be a LEARS issue. In prior years, the state reported

having no registered MSFWs in the state labor exchange system. When there are no registered MSFWs indicated in the system, LEARS automatically marks the "equity indicator" as not being met. The issue was reported by Oklahoma and other states experiencing the same problem. The state was told that this system issue would be considered when the LEARS report was reviewed by USDOL, and that the system should show Oklahoma as having met the "equity indicator." The logic is that the state cannot provide services to a population that doesn't exist/isn't registered.

We will soon have the opportunity through our new state labor exchange system, currently in development, to begin the monitoring and review process of every applicant who registers as a possible MSFW, which will allow real-time proper and correct identification of misclassified applicants. In addition, the process will mean real-time communication with those possible MSFWs to ensure program information is understood, service needs are documented, and potential barriers are identified before referrals are made or enrollments occur. Oklahoma believes the proper identification of MSFWs at American Job Centers and in the state labor exchange system along with intensive outreach and real-time follow-up will result in meeting more equity indicators each quarter. The SMA will continue to review and advocate for improved data representative of the agricultural community, its employers, and its workers.

D. ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Progress from the last plan has been made. This includes but is not limited to:

- The assignment of a full-time State Monitor Advocate and the addition of a full-time Outreach Coordinator to support the two part-time outreach workers and provide consistency, build trust, and create relationships with the workforce system stakeholders, the MSFWs, and their employers.
- The re-establishment of an Agricultural Outreach Group as a joint effort between OESC and USDOL Wage & Hour. This group continues to grow and is becoming more unified in strategies to educate others about the needs and concerns of MSFWs and planning outreach activities.
- Identification of significant documents, informational materials, and other items used daily by the AJC that need translation to Spanish, the primary non-English language identified.
- Identification of additional agricultural groups, organizations, and associations and pursuing alliances with them. This primarily occurs through the Agricultural Outreach Group. A good example of this activity is the collaboration with the Red Cross and Catholic Charities to establish 24-hour emergency procedures to assist with MSFWs who may find themselves stranded or needing immediate assistance outside of normal working hours.

- Establishment of a more visible MSFW internet presence through the development and continued updates of an Oklahoma State Monitor Advocate webpage on the public website.
- Development of a social media campaign to expand outreach and disseminate information.
- Instructor-led training kicked off in PY22 for MSFWs and the ES Complaint System that included procedures and desk aids for state merit staff.

Several activities needing further attention which are carried over to this plan, include but are not limited to:

- On-going AJC reviews to identify technical assistance opportunities for additional training and support. This includes efforts identified in this plan for AJC staff and other workforce system stakeholders that include on-demand, eLearning presentations and other training materials as needed.
- The development and distribution of ARS handbooks to assist both farmworkers and employers.
- Identification of proven LMI methods and other data-gathering resources for better identification of MSFWs in the state. The SMA will continue to identify data shortcomings on available MSFW information seeking assistance from the SWA Research Division, federal partners, and other key stakeholders.

E. STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

An update of the Oklahoma State AOP was completed, reviewed & approved by the Oklahoma State Monitor Advocate.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for	Yes

The State Plan must include	Include
vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	Yes
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not

propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data

reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	62.2 %		62.2 %	
Employment (Fourth Quarter After Exit)	63.0%		63.0%	
Median Earnings (Second Quarter After Exit)	\$6,840.00		\$6,840.00	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

(a) Aligning Content Standards. Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under Section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The Oklahoma Department of Career and Technology Education (ODCTE) Adult Education & Family Literacy Division will utilize the Oklahoma state approved standards adopted by the Oklahoma State Department of Education. State adopted standards:

- Do focus on deep thinking, conceptual understanding, and real-world problem-solving skills.
- Do set expectations for students to be college, career, and citizenship ready.
- Do incorporate literacy in science, social studies, and technical subjects.
- Do emphasize the use of citations and examples from texts when creating opinions and arguments.
- Do increase rigor and grade-level expectations.
- Do determine the full range of support for English language learners and students with special needs.

Oklahoma's approved assessments are standardized, valid, reliable, and approved for use by the Office of Career, Technology, and Adult Education (OCTAE). Standardized is defined as having directions, time limits, materials, and scoring procedures that are designed to remain constant each time the test is given. Valid is defined as the degree to which the assessment measures what it is intended to measure. Reliable is defined as the consistency with which an assessment produces results. Pre-assessment is defined as the initial assessment administered to a student when they first enroll in the program for the current fiscal year. Post-assessment is defined as an assessment administered to a student to measure learning gains since the pre-assessment or their last assessment in the current fiscal year.

Educational Functioning Level (EFL) of a student is determined by the National Reporting

System (NRS) approved standardized assessment scale scores. All students are placed into an appropriate EFL as determined by the student's scale score of the standardized assessments chosen by the state. State performance targets for the NRS educational functioning levels are negotiated between the state and OCTAE each fiscal year. Local programs are responsible for meeting these state EFL targets. The state's aggregated pre- and post-assessment data collected from local programs determines whether the state meets its performance targets for a fiscal year. In addition to using required standardized assessments for NRS reporting and accountability, programs use assessments for instructional purposes.

Accountability and reporting purposes of assessment include but are not limited to:

- Uniform measurement of learner gains that are aligned with the NRS educational functioning levels.
- Consistent comparison of the success of programs in meeting state performance targets.
- Consistent comparison of program data for performance-based funding.
- Instructional purposes of assessment include but are not limited to:
 - Determining the instructional needs of individual learners.
 - Determining the effectiveness of instruction through learner gains.
 - Providing information regarding local program and/or statewide professional development needs.

B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—

1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
2. Is for the purpose of educational and career advancement.

Special Rule. Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

All Adult Education and Family Literacy activities under WIOA are authorized by the Oklahoma Department of Career and Technology Education (ODCTE). As the pass-through agency for the Adult Education Family Literacy Act (AEFLA) grant, ODCTE administers and monitors federal and state adult education and literacy funds to local providers and provides program development and training activities to assure quality basic skills services for all students across the state. Grant awards will be competitive and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections), Section 231 (Adult Education and Family Literacy), and Section 243 (Integrated Education and Training). The state has developed a comprehensive application for all three sections 225, 231, and 243 that addresses all WIOA requirements and considerations. As part of the application process, programs must submit the last two years of the organization's outcome data. After the application deadline, applications that demonstrate effectiveness, as per Federal Code of Regulations §463.24 will then be reviewed by a panel using a developed rubric, and a pre-award risk assessment will be conducted. Evaluation criteria will include the thirteen considerations in Section 231(e) of the Workforce Innovation and Opportunity Act Title II, Adult Education and Family Literacy, as well as other components deemed necessary to review the application. Local workforce development area boards will review applications to determine alignment of the applications with their local plans and provide recommendations to the Oklahoma AEFL state staff. After all recommendations are reviewed, ODCTE will determine the final award recipients. Grants will be awarded directly to eligible and approved service providers. Under WIOA, ODCTE will fund the following activities:

- Adult Education
- Literacy
- Workplace adult education and literacy activities
- Family literacy activities
- English language acquisition activities
- Integrated English Literacy and Civics Education
- Workplace preparation activities

Every AEFL service provider will provide one or more of these local activities. AEFL service providers not providing all local activities listed may assist AEFL students in referring those students to organizations that provide those activities.

Definition of Activities:

- *Adult Education:* Academic instruction and educational services below the postsecondary level that include an individual's ability to:
 - Read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its equivalent.
 - Transition to post-secondary education and training; and
 - Obtain employment
- *Literacy:* The ability to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family, and in society.
- *Workplace Adult Education and Literacy Activities:* Adult education and literacy activities in collaboration with an employer or employee organization at a workplace or off-site location that is designed to improve the productivity of the workforce.
- *Family Literacy Activities:* Activities of sufficient intensity and quality to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children's learning needs, and that integrate all the following activities:
 - Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency.
 - Interactive literacy activities between parents or family members and their children.
 - Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children.
 - Age-appropriate education to prepare children for success in school and life experiences.
 - No funds under this grant may be used for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except the agency may use such funds of programs, services, or activities related to family literacy. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

- *English Language Acquisition Activities*: Program of instruction designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language and that leads to
 - Attainment of a secondary school diploma or its equivalent and
 - Transition to postsecondary education and training; or
 - Employment.
- *Integrated English Literacy and Civics Education (IELCE)*: Education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries that enable them to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.
- *Workforce Preparation Activities*: Activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.
- *Integrated Education and Training (IET)*: Service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. This includes offering courses in collaboration with community colleges or technology centers that are team taught by an Adult Education basic skills teacher and a career/technical teacher.

Adult education and literacy activities, including adult education, literacy, and family literacy activities, will utilize the Oklahoma Academic Standards established by the Oklahoma State Department of Education (OSDE), which include English language arts, mathematics, science, social studies, fine arts, world languages, health, physical education, personal financial literacy, and computer science. The Oklahoma Academic Standards serve as expectations for what students should know and demonstrate by the time they complete their high school equivalency. These standards may assist the Oklahoma AEFL providers in providing the guidance and expectations necessary for a student to receive their high school equivalency.

ODCTE's goal is to improve Oklahoma's economy by providing individuals with the necessary training and skills to succeed in the workplace and to compete in a global market. To meet Oklahoma's workforce demands, ODCTE leverages business/educational partnerships to enhance career awareness and increase educational attainment for all Oklahomans. ODCTE assists those adults who are most in need of literacy services, including low-income individuals, adults with minimal literacy skills, and adults with disabilities, in improving their ability to read, write, and speak in English, compute, and solve problems at levels of proficiency necessary to function on the job, in the family, and in society.

ODCTE conducted three competitions for new grants that were awarded July 1, 2022. The next competition will begin in early 2026 for awards to be granted July 1, 2026. The grant application will address the thirteen considerations established in Title II. The competition will be open to all eligible providers of demonstrated effectiveness. The grant application will contain the criteria listed in Section 232 of the Workforce Innovation and Opportunity Act Title II, Adult Education and Family Literacy. Applications will be reviewed by ODCTE to evaluate demonstrated effectiveness. A rubric will be developed, and evaluation criteria will include the thirteen considerations in Section 231(e) of the Workforce Innovation and Opportunity Act Title II, Adult Education and Family Literacy, as well as other components deemed necessary to review the application.

The 13 considerations are as follows:

1. Describe the degree to which your organization would be responsive to—
 - Regional needs as identified in the local workforce development area plan under Section 108 of title I of WIOA.
 - Serving individuals in the community who were identified in the local workforce development area plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills or who are English language learners.
2. The ability of your organization to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.
3. Past effectiveness of your organization in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in question 4 above, especially with respect to eligible individuals who have low levels of literacy.
4. The extent to which your organization demonstrates alignment between proposed activities and services and the strategy and goals of the local workforce development area plan (Section 108), as well as the activities and services of the one-stop partners.
5. Whether your organization's program is 1) of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and 2) uses instructional practices that include the essential components of reading instruction.
6. Whether your organization's activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.
7. Whether your organization's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.

8. Whether your organization's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship.
9. Whether your organization's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development, including through electronic means.
10. Whether your organization's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;
11. Whether your organization's activities offer flexible schedules and coordination with Federal, State, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs.
12. Whether your organization maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with question 4 above) and to monitor program performance; and
13. Whether the local areas in which your organization is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Regarding the federal money ODCTE receives, up to 12.5 percent is allowed for leadership activities; 5 percent of the federal money is allowed for administrative activities; a minimum of 82.5 percent of the federal money must be distributed to grantees.

Allocations for correctional programs are subtracted from the money distributed to grantees (minimum of 82.5 percent) prior to allocating monies to local grantees. The total amount allocated to correctional programs may be up to 20 percent of the 82.5% of the total grant award (this may be up to 16.5% of the total award that is allowed for corrections education).

The remaining balance (after corrections) of the minimum of 82.5% is the amount to be allocated to local grantees. ODCTE staff will determine an allocation amount for each of Oklahoma's 77 counties. This allocation for each county will include the number of eligible individuals within each respective county. This will include population, eligible individuals 18-24 years of age that do not have a high school diploma or its recognized equivalent, and eligible individuals 25+ years of age that do not have a high school diploma or its recognized equivalent. A formula will be developed using these variables to determine an allocation amount for each county. Applicants will select which counties that they would like to serve. Eligible applicants will compete for the allocation of their selected counties. Multiple providers may be granted an allocation within a specific county, and the allocation will be divided between those providers

within that specific county. Multiple service providers may be selected within a county based on funding requested on dollars available.

Eligible applicants will determine a budget for providing services in the counties requested and ODCTE will evaluate these budgets. Budgets should reflect counties which eligible applicants plan to serve. Negotiations will occur when more than one eligible applicant is determined for a specific county. Awards may be based on multiple factors including reasonableness of the budget relative to the service area, quality of the application, past performance including Measurable Skill Gain attainment relative to the state performance target, expected number of individuals to be served, workforce board recommendations, previous year allocation, past expenditures, and results from the pre-award risk assessment.

Allocation amounts for each service provider will be determined using a formula that accounts for the eligible individuals in an AEFL service area, performance of the service provider, and provider need.

The following factors may be utilized to calculate the allocation for the 4 year grant cycle:

- Provider need
- Total number of fundable students each program plans to serve. Fundable students are defined as meeting the following criteria:
 - Educational functioning level to be tracked for educational gain during 12 or more attendance hours.
 - A pre-assessment score for the fiscal year that places them in an educational functioning level determined by the National Reporting System (NRS).
 - A per fundable student dollar amount.
- Program performance may be based on the following criteria:
 - Meeting or exceeding the state's NRS educational functioning level target goal percentage.
 - Meeting or exceeding the state's target goal percentage in each NRS Core performance area (Obtaining a high school equivalency diploma, entering postsecondary education/training, entering employment, retaining employment).
 - Enrollment/attendance data.
 - Meeting or exceeding the state's target percentage of 50 percent for students receiving a pre- and post-assessment score within the fiscal year.

Service providers not meeting negotiated performance levels may see a reduction in their allocation for the following year(s). Those service providers meeting or exceeding their performance levels may be eligible for an increase in their allocation in their funding for the following year(s) from the pool of funds not allocated to those providers not meeting performance levels. ODCTE may limit the carryover of an AEFL service provider. The carryover limit may not exceed 25% of their projected allocation for the upcoming year. The overage will then be redistributed to other service providers.

Special Rule. Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

All Adult Education and Family Literacy activities under WIOA are authorized by the Oklahoma Department of Career and Technology Education (ODCTE). As the pass-through agency for the Adult Education Family Literacy Act (AEFLA) grant, ODCTE administers and monitors federal and state adult education and literacy funds to local providers and provides program development and training activities to assure quality basic skills services for all students across the state. Grant awards will be competitive and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections), Section 231 (Adult Education and Family Literacy), and Section 243 (Integrated Education and Training). The state has developed a comprehensive application for all three sections 225, 231, and 243 that addresses all WIOA requirements and considerations. As part of the application process, programs must submit the last two years of the organization's outcome data. After the application deadline, applications that demonstrate effectiveness, as per Federal Code of Regulations §463.24 will then be reviewed by a panel using a developed rubric, and a pre-award risk assessment will be

conducted. Evaluation criteria will include the thirteen considerations in Section 231(e) of the Workforce Innovation and Opportunity Act Title II, Adult Education and Family Literacy, as well as other components deemed necessary to review the application. Local workforce development area boards will review applications to determine alignment of the applications with their local plans and provide recommendations to the Oklahoma AEFL state staff. After all recommendations are reviewed, ODCTE will determine the final award recipients. Grants will be awarded directly to eligible and approved service providers.

Oklahoma may fund academic programs for adult education and literacy activities; special education, as determined by the eligible agency; secondary school credit; integrated education and training; career pathways; concurrent enrollment; peer tutoring; or transition to re-entry initiatives and other post release services with the goal of reducing recidivism. Adult education and literacy classes will be provided in correctional facilities. Each individual, who is entering into the corrections system, will be assessed, and if deemed eligible for release within five years, will receive priority for adult education services. Instructional strategies for this population will include:

- Academic programs that teach basic skills in reading, writing, and math.
- Adult secondary programs that lead to a high school equivalency or its equivalent credential.
- Workplace education programs that teach job-specific basic skills related to the offenders' job assignments in the correctional facilities.
- Instruction in job readiness
- Life skills and self-esteem
- English literacy - Since it is recognized that many offenders may have a learning disability, students may be screened for learning disabilities using inventories or other screening instruments, if it is deemed appropriate by the instructor.
- Integrated education and training programs

Other institutionalized adults may include those in mental health institutions, juvenile detention centers, diversion programs, and drug abuse and treatment centers. Strategies for these adults will include teaching basic skills and literacy in the contexts of real-life situations, such as life skills, self-esteem, employment, and citizenship.

ODCTE has partnered with the Oklahoma Department of Corrections and has established sixteen Skills Centers within correctional facilities that provide career and technical training opportunities to incarcerated individuals. This allows funding to be provided which may support adult education and literacy activities, integrated education and training, career pathways, concurrent enrollment, and transition to re-entry initiatives and other post release services with the goal of reducing recidivism. ODCTE will provide funds to correctional institutions and institutions that wish to provide services to criminal offenders and juveniles in detention centers, as well as individuals participating in diversion programs. ODCTE provides state funds that are used to fund the Career Tech training programs in the Skills Centers within these correctional facilities; however, federal AEFL funds are used to support the Adult

Education & Family Literacy activities in state correctional institutions.

To prepare offenders for successful transition, career and technical education, employability and life skills are integrated into this educational delivery system. Skills Center students may seek certifications recognized by both state and national industries. Career Readiness Credentials (CRC) may be secured documenting work readiness skills many business and industry employers seek. The Skills Centers provide students with numerous interconnected and integrated components, each an integral part of preparing offenders for success in the workplace and in society. The Skills Centers work in conjunction with the Oklahoma Department of Corrections (ODOC) and Oklahoma Correctional Industries (OCI) to offer a U.S. Department of Labor, Bureau of Apprenticeship and Training, registered apprenticeship programs for offenders in cabinetmaking.

Regarding the federal money ODCTE receives, up to 12.5% is allowed for leadership activities; five percent of the federal money is allowed for administrative activities; a minimum of 82.5% of the federal money must be distributed to grantees.

Allocations for correctional programs are subtracted from the money distributed to grantees (minimum of 82.5%) prior to allocating monies to local grantees. The total amount allocated to correctional programs may be up to 20% of the 82.5% of the total grant award. The Corrections funding process will be conducted separately, and additional consideration may be given to how the applicant plans to integrate correctional programming.

ODCTE will conduct an open competition for new grants to be awarded July 1, 2026. The grant application will address the thirteen considerations established in Title II. The competition will be open to all eligible providers of demonstrated effectiveness. The grant application will contain the local application criteria listed in Section 232 of the Workforce Innovation and Opportunity Act Title II, Adult Education and Literacy as well as other criteria. Each applicant will fill out the same application. This will ensure direct and equitable access to all eligible providers. Applications will be reviewed by a review panel selected by ODCTE. A rubric has been developed, and evaluation criteria does include the 13 considerations in Section 231(e) of the Workforce Innovation and Opportunity Act, Title II Adult Education and Literacy as well as other components deemed necessary to review the application.

Awards may be based on multiple factors including reasonableness of the budget relative to the service area, quality of the eligible applicant's past performance; including Measurable Skill Gains attainment relative to the state performance target, expected number of individuals to be served, workforce board recommendations, previous year allocation, past expenditures, and results from the pre-award risk assessment.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

a. Integrated English Literacy and Civics Education (IELCE) Program Design and Integration:

All Adult Education and Family Literacy Act (AEFLA) activities under WIOA are authorized by the Oklahoma Department of Career and Technology Education (ODCTE). As the pass-through agency, ODCTE administers and monitors federal and state adult education funds, awards competitive grants to local providers, and delivers professional development to ensure high-quality services statewide.

Grant awards are made through a competitive process in accordance with WIOA Sections 225 (Corrections), 231 (Adult Education and Family Literacy), and 243 (Integrated English Literacy and Civics Education). A comprehensive application process addresses all WIOA requirements and the 13 Considerations in Section 231(e). Applications must include two years of outcome data to demonstrate effectiveness (§463.24) and are evaluated by a review panel using a standardized rubric. Local Workforce Development Boards review applications for alignment with local plans and provide recommendations to ODCTE, which makes the final funding determinations.

b. Program Design and Integration with the Workforce System:

The IELCE program provides English language learners, including professionals with credentials from other countries, the opportunity to achieve English language proficiency and acquire the literacy, workforce, and civic skills necessary to succeed as workers, parents, and citizens. Instruction includes literacy and English language acquisition, as well as education on the rights and responsibilities of citizenship and civic participation (§463.33).

ODCTE designs the IELCE program to integrate fully with the local workforce development system, ensuring alignment with WIOA partner activities. Integration occurs through participation in workforce meetings, coordination of student referrals, and collaboration with one-stop centers and local employers. The goal is to prepare English language learners for unsubsidized employment in in-demand industries that lead to economic self-sufficiency.

c. IELCE and Integrated Education and Training (IET):

In compliance with §463.74, IELCE services are implemented in combination with Integrated Education and Training (IET). Providers may co-enroll participants in IET programs funded by other sources or use Section 243 funds to support IET directly. Each IET includes the three required components, adult education and literacy, workforce preparation, and workforce training, and must be delivered concurrently and contextually with a single set of learning objectives as part of a defined career pathway (§463.36–38).

d. Funding Allocation and Performance Accountability:

ODCTE determines county-level funding allocations based on adult English language learner demographics and immigration trends across Oklahoma’s 77 counties. Applicants propose budgets, describe service plans, and select the counties they intend to serve. Multiple providers may be funded within a county, with allocations divided based on funding requests and availability.

Grant awards are determined using multiple factors, including budget reasonableness, past performance (e.g., measurable skill gains), service capacity, workforce board recommendations, and results of pre-award risk assessments. ODCTE provides ongoing technical assistance to ensure compliance and support performance improvement.

Providers that fail to meet performance benchmarks after receiving technical assistance may have funding reduced, suspended, or reallocated to other service providers. Conversely, providers meeting or exceeding targets may receive increased allocations in subsequent years. ODCTE’s carryover limit may not exceed 25% of projected allocations; any overage is redistributed to other eligible providers.

Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Adult English language learners (ELLs), including professionals who hold degrees and credentials from their home countries, are served through Integrated English Literacy and Civics Education (IELCE) programs designed to build both language proficiency and workforce readiness.

IELCE programs in Oklahoma provide instruction that integrates English language acquisition with civics education and workforce training. Learners develop the language, digital literacy, and employability skills needed to participate fully in their communities and advance in the workplace. Instruction is contextualized around real-life situations, including workplace communication, career pathways, and civic engagement.

Describe how the Integrated English Literacy and Civics Education program under Section 243(a) of WIOA will be designed to prepare adults who are English language learners for and place such adults in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Eligible providers will deliver IELCE activities in combination with IET activities. These two pieces work together to prepare English language learners for unsubsidized employment. Funded programs must meet with local Title I partners to identify and select appropriate in-demand industries. Funded programs will develop appropriate contextualized curriculum that incorporates high quality English language activities, workforce preparation activities such as

job searching, resume writing, mock interviews, on-the-job behavior, job promotion tips, self-advocacy, the rights, and responsibilities of a worker, and how to understand pay and benefits. Funded programs will work with a post-secondary or technical school to provide the training portion of the program. During this training, students will learn the skills needed to be successful in their new occupations. Program staff and Title I staff will assist students in job searching and the transition to employment.

[Describe how the Integrated English Literacy and Civics Education program under Section 243\(a\) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.](#)

Eligible providers will develop partnerships with business, industry, and the local workforce development boards to provide adult education and literacy activities. These collaborations will provide workforce preparation activities and workforce training in collaboration with employers designed to improve the productivity of the workforce, as well as educational and career advancement for the eligible individual. Eligible providers will coordinate with local workforce partners to identify in-demand industries and occupations, create appropriate education and training, and place them in unsubsidized employment in those identified occupations.

Eligible providers will encourage IELCE participants to co-enroll with local workforce development system partners. Co-enrollment will allow all WIOA partners to provide unique services without duplication. This will permit the participant to have improved access to activities leading to recognized post-secondary credentials, including industry-recognized certificates, and portable, stackable credentials. Ultimately, co-enrollment increases the opportunities for a worker's pathway to career advancement.

Title I staff will provide workforce preparation activities throughout the duration of the program and coaching to students as they begin to transition out of the IELCE program into unsubsidized employment. These touch points will give students additional mentors and helpers to use as supports throughout their journey in the program and during their initial phase as a new worker.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

Oklahoma will use State Leadership funds under Section 223 of WIOA to support the following leadership activities: statewide professional development, technical assistance, and continuous improvement initiatives that strengthen the alignment of adult education with other WIOA partners. Each year, ODCTE will allocate State Leadership funds to ensure that every AEFL provider participates in high-quality professional development aligned with state performance measures and identified program needs.

Alignment with one-stop partners and core programs: Oklahoma's adult education providers enter into a memorandum of understanding with the one-stop center(s) in their local workforce development area. In addition to fulfilling the terms outlined in each specific MOU, representatives from local adult education providers regularly attend Local Workforce Development Board (LWDB) meetings and establish strategic partnerships with LWDBs and

other core WIOA partners to support adult education students. One-stop providers refer individuals in need of adult education services to the adult education provider. In some areas of the state, adult education providers may offer classes at their local one-stop center.

Professional Development (§223(a)(1)(B)): Funds will support training on evidence-based instructional practices, technology integration, assessment, data management, and serving adults with learning disabilities.

Technical Assistance (§223(a)(1)(C)): ODCTE will provide ongoing assistance to eligible providers in the following areas:

- Use of technology for instruction, data collection, and reporting through LiteracyPro's LACES system
- Administering and interpreting the TABE assessment
- Implementing family literacy and work-based education programs
- Enhancing student retention and transitions to postsecondary education and employment
- Coordinating services with local one-stop centers and employers

Monitoring, Evaluation, and Dissemination (§223(a)(1)(D-E)): ODCTE will monitor program effectiveness through data analysis and site visits, evaluate provider performance against state indicators, and disseminate promising practices statewide through conferences, workshops, and digital resources.

Collectively, these activities ensure that State Leadership funds strengthen program quality, promote alignment with the state's workforce system, and enhance outcomes for adult learners.

Monitoring and evaluation of the quality and improvement of adult education activities as described in Section 223 (1)(d).

State Leadership funds will be used to support the monitoring and evaluation of adult education and literacy activities, as required under Section 223(1)(D) of WIOA. According to state policy, ODCTE will monitor AEFLA-funded programs through on-site, virtual, or hybrid visits conducted throughout the program year. Monitoring activities ensure that valid and reliable student performance data are collected and reported, and that instructional programs are implemented in accordance with approved applications. Regular fiscal reviews will be conducted, and ODCTE will follow established risk assessment and monitoring policies.

Monitoring visits will review student records, fiscal and data management practices, staff development, instruction, curriculum, and testing procedures. Findings from these visits will be used to guide professional development priorities, improve instructional quality, and inform targeted technical assistance. In this way, monitoring and evaluation activities directly support continuous improvement and accountability across Oklahoma's adult education system.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

Oklahoma will use State Leadership funds under Section 223 of WIOA to support permissible activities of statewide significance that advance the goals of the Adult Education and Family Literacy Act. These funds will be used by ODCTE to design, coordinate, and implement

initiatives that promote program quality, innovation, and alignment with workforce and postsecondary systems.

Permissible activities may include statewide outreach to instructors, students, and employers; initiatives to promote attainment of high school equivalency credentials; and support for screening and serving adults with learning disabilities. Funds may also be used to promote workforce-focused adult education, including the development and implementation of Integrated Education and Training (IET) programs.

ODCTE may use State Leadership funds to assist in developing systems that facilitate transitions from adult education to postsecondary education, including linkages between AEFLA-funded programs and Oklahoma's career and technology education programs. Additional statewide activities may include partnerships with literacy coalitions, support for statewide conferences and adult education teacher associations, and outreach activities that raise awareness of adult education opportunities across Oklahoma.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

ODCTE will evaluate annually the effectiveness of adult education and literacy programs. The annual evaluation is designed to measure the ability of local programs to meet or exceed the established performance levels based on the federal and state indicators of performance, as well as their ability to reach high standards. Annual evaluation activities will include the following:

1. Performance results achieved on each of the federal and state indicators of performance will be compiled and compared to ODCTE's performance levels negotiated with the United States Department of Education. Progress towards meeting the levels of performance will be tracked through the LiteracyPro management information system, which evaluates and provides data analysis for Oklahoma's adult education and literacy programs for improved data quality and collection. LiteracyPro allows local programs to collect, compile, and report student identification and demographic information, contact hours, placement level at program entry, learning goals, pre- and post- testing information, student progress and follow-up, and other needed information to help improve program quality. ODCTE will build on the National Reporting System (NRS) to identify strategies that local providers can use to obtain follow-up information on students who leave the program and obtain employment, retain employment, or job advancement, enter post-secondary education or job training programs, and/or attain a high school equivalency. These strategies may include sampling techniques which conform to ODCTE's specifications as identified in the annual performance report and approved by the Office of Management and Budget. The data specialist uses frequently asked questions to determine professional development needs of local programs.
2. ODCTE will follow its risk assessment and monitoring policy. On-site, virtual, or hybrid monitoring will be completed for all programs within a four-year grant cycle. The on-site evaluations will be conducted by a review team consisting of state adult education

and literacy staff members, local adult education professionals and/or Title I partner, if appropriate. Monitoring visits will be conducted to check for federal and state compliance, use of funds, student records, program facilities, organizational program support, professional development, instruction, curriculum, testing, assessment, and other areas deemed necessary by ODCTE. Monitoring may also include classroom visits and data spot-checks to ensure quality performance is being met by programs. State staff may conduct interviews, surveys, and review documentation, which supports program performance, quality, and the criteria for funding. Based on the findings of the on-site monitoring, a final monitoring report detailing program strengths, areas of non-compliance, and recommendations for improvement will be completed for each program reviewed.

3. ODCTE will perform data reviews of all local adult education and literacy programs throughout the fiscal year. Based on any potential non-compliant findings of the data review, on-site reviews may be conducted to determine on-going technical assistance.
4. Fiscal reviews for funded programs may be conducted for compliance with state and federal regulations, policies, and guidelines.
5. An annual needs assessment and the program's professional development plan will assist in determining professional development needs. Research-based professional development will be provided. ODCTE Adult Education & Family Literacy division will evaluate professional development through surveys and performance indicators.
6. Oklahoma will provide state administration funds annually for each AEFL provider to participate in high quality professional development related to adult education and literacy activities. ODCTE may specify criteria for professional development based upon program needs and state performance measures. Each program will receive a professional development allocation. The state will also provide professional development utilizing conference calls, regional meetings, webinars, virtual meetings, and other means. ODCTE will offer adult education professional development workshops to improve the quality of instructional programs for adult learners. Adult education instructional personnel and program administrators will be required to complete a minimum of 15 hours of professional development hours per program year. Professional development topics to be covered may include areas suggested by the AEFL service providers, as well as areas necessary for the advancement of adult education in Oklahoma. Some areas of professional development include:
 - Best practices in instruction
 - Classroom management
 - Supporting adults with learning disabilities and other learning differences
 - Developing and implementing work-based education programs
 - Student retention
 - Blended learning
 - Interactive pedagogy

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes

The State Plan must include	Include
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under

grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to wioa@ed.gov at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

APPLICANT'S ORGANIZATION	Enter information in this column
Organization	Oklahoma Career and Technology Education
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Brent
Last Name	Haken
Title	Oklahoma State Director of Career and Technology
Email	Brent.haken@careertech.ok.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

- The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or
- The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.
- The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

ODCTE's mission is to ensure that Oklahomans have the opportunity to be fully participating workers, parents and citizens in our state. Adult education and literacy is an investment in our people.

The ODCTE will ensure that barriers are prevented from occurring which may impede equitable access or participation for gender, race, national origin, color, disability, or age. The ODCTE regularly provides technical assistance and guidance to local providers when potential barriers present themselves. For example, the ODCTE has worked with the Department of Rehabilitative Services to ensure that individuals who are hearing impaired have equitable access to instruction, which includes local providers utilizing sign language interpreters for those eligible individuals requesting this resource. As these barriers present themselves, the ODCTE works with other WIOA core and required partners, as well as other parties, in determining measures that remove and eliminate barriers based on gender, race, national origin, color, disability, or

age. Another stakeholder that ODCTE has worked with is Oklahoma ABLE TECH. This organization provides individuals with assistive technology devices and services through a short-term loan system, digital accessibility training, and financial services for clients with disabilities.

ODCTE also ensures that all state and local program staff have the right to work in a positive environment which is free from discrimination based on race, color, religion, sex, national origin, age, protected disability, veteran status or any other characteristic protected under applicable federal, state or local law. ODCTE staff and local partners and providers also comply with all applicable federal and state laws, rules and regulations, including the Americans with Disabilities Act.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or care-giving status.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA

Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Based on the barriers that have been identified, Adult Education and Family Literacy (AEFL) enrollment policies and procedures will be in place to provide equitable access and participation for all Oklahomans. A student will not be denied participation in an AEFL program based on any barrier that is identified. Programs may seek support services to assist in providing access to programs. Support systems may include adaptations or modifications for those with disabilities, transportation, childcare, and housing benefits. Enrollment forms include information to be provided by participants on gender, race, ethnicity, national origin, and disability. This information is requested for data purposes only, and a student will not be denied access to program participation for not disclosing this information.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Annual director's meetings will address enrollment policies and procedures prior to the start of the new academic year. Quarterly technical assistance is provided to local programs to address barriers. Program monitoring occurs once per grant cycle. All applicants for new awards must include information in their application to address the new provisions of Section 427 of GEPA, in order to receive funding from ODCTE.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the

Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	39.0%		40.0%	
Employment (Fourth Quarter After Exit)	41.0%		42.0%	
Median Earnings (Second Quarter After Exit)	\$45,300		\$5,350	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Credential Attainment Rate	31.0%		32.0%	
Measurable Skill Gains	44.0%		44.5%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	Vacant	9/2023
Parent Training and Information Center	1	10/2023
Client Assistance Program	2	10/2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	10/2023
Community Rehabilitation Program Service Provider	1	10/2023
Business, Industry, and Labor	2	10/2023
Business, Industry, and Labor	2	10/2023
Business, Industry, and Labor	1	09/2025
Business, Industry, and Labor	1	2/2024
Disability Advocacy Groups	2	9/2022
Current or Former Applicants for, or Recipients of, VR services	1	9/2025
Section 121 Project Directors in the State (as applicable)	1	11/2023
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2	10/2023
State Workforce Development Board	1	11/2024
VR Agency Director (Ex Officio)	2	No Term Limit
Disability Advocacy Group	1	2/2024
Disability Advocacy Group	1	9/2025

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

The Oklahoma Rehabilitation Council (ORC) works diligently and continuously to look for new members when a term expires or a member resigns. The ORC currently has only one vacancy for the Statewide Independent Living Council. The ORC Program Manager has been in contact with the Director of Appointments about this vacancy. The ORC meets quarterly as required and also hosts a strategic planning session yearly with the DSA.

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

The Oklahoma Rehabilitation Council (ORC) was established in 1993 as mandated by the 1992 Amendments to the Rehabilitation Act. Its mission is to facilitate consumer education and empowerment, to ensure services are of high quality, and lead to the employment of individuals with disabilities within the state of Oklahoma.

The ORC submits the following recommendations for inclusion in the Oklahoma State Plan. These recommendations are based on the 2023–2025 Comprehensive Statewide Needs Assessment (CSNA), conducted by the Oklahoma Department of Rehabilitation Services (DRS). The CSNA evaluated statewide disability needs, service gaps, and outcomes across six required assessment categories.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

Recommendation 1: Need to Establish, Develop, or Improve Community Rehabilitation Programs (CRPs)

In relation to Community Rehabilitation Programs (CRPs), the ORC recommends increasing the number and or capacity of CRPs in underserved regions (for example, service-desert counties in Southeastern and Western Oklahoma). Continued implementation of the recent rate increases, combined with regular biennial reviews, will help stabilize the provider network, and stronger coordination with CRPs is needed to improve referral processes and reduce service gaps.

Response: The DSA supports the recommendation and will continue efforts to expand CRPs to address statewide needs, with particular emphasis on rural areas. The partnership between DSA and DHS/DDS has strengthened and continues to evolve, reflecting a shared commitment to increasing competitive integrated employment opportunities for individuals with the most significant disabilities. DSA collaborates with DDS to identify training needs, address areas for improvement, and enhance cross-system practices. This partnership has improved communication among agency staff, elevated service quality and efficiency, and positively impacted employment outcomes.

Recommendation 2: Service Needs of those with the Most Significant Disabilities, including Supported Employment

Regarding individuals with the most significant disabilities, the ORC recommends expanding Supported Employment services and strengthening job placement capacity, especially in rural areas where service shortages are most acute. The Council also recommends improving access to mental health supports identified as the most frequently missing service and promoting accessibility in digital job applications, while also increasing outreach to employers who are willing to hire individuals with complex needs.

Response: The DSA agrees with the recommendation. The DSA will continue to focus on increasing the utilization of Community Rehabilitation Providers that provide supported employment services to improve employment outcomes of individuals with the most significant disabilities statewide. The DSA and Business Services Program also emphasize accessibility like the “Access Business Coach” initiative focused on coaching employers on accessibility. Training on the Road will launch in the Spring of 2026 to deliver training to businesses in rural areas.

Recommendation 3: Service needs of those who are Unserved or Underserved

To better serve unserved and underserved individuals, the ORC recommends targeted outreach in counties with both high disability prevalence and low DRS penetration rates. Increased use of virtual service delivery can help narrow access gaps in rural communities. Focused strategies are especially needed for Congressional District 2, where employment, poverty, and educational disparities remain disproportionately high.

Response: The DSA agrees with the recommendation. The DSA continuously focuses on improving community outreach and service delivery in underserved areas of the state through business services, training programs, the OLBPH and through counselor outreach. The Business Services Program also integrates virtual tools and online events to broaden outreach and connect employers statewide with job seekers. **Recommendation #4:** Needs of Youth with Disabilities, and Students with Disabilities, including Their Need for Pre-Employment Transition Services or Other Transition Services

The Council recommends continuing to collaborate and partner with school districts to increase referrals of students with disabilities and broaden the reach of Pre-Employment Transition Services. Greater family engagement is needed to support youth participation in employment planning, and continued expansion of transition programs—including summer initiatives—should prioritize equitable access for rural and underserved communities. Addressing disparities among minority youth is also a key priority to ensure fair and consistent outcomes across student groups.

Response: The DSA agrees with the recommendation. The Transition Coordinator, DSA Transition Teams, and the Department of Education – Special Education Services are working collaboratively to create awareness and training to teachers and administration. The DRS team continues to assist schools with transition resource fairs across the state to encourage more involvement with DRS and other agencies and have expanded into rural areas because of these collaborations and connections.

The Council remains committed to supporting the Department of Rehabilitation Services in advancing an equitable, responsive, and effective vocational rehabilitation system statewide.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

The information in the following sections are from the Oklahoma Department of Rehabilitation Services 2023-2025 Statewide Needs Assessment.

- Transportation issues, including routes, schedules, accessibility, and cost, continue to be an employment barrier across the state.
- The increasing cost of housing makes it very difficult for a person receiving SSI only to afford rent in Oklahoma, particularly in the Tulsa and Oklahoma City areas (TAC 2025).
- Training and education remain essential needs for individuals with disabilities, including degrees and certificates that meet the requirements of job openings that are available in the state.
- Those with self-care difficulties continue to have the lowest employment rates according to the 2023 ACS data. For PG1 cases with a plan date in FFY 2023 or 2024, counselors identified 1,658 cases with a self-care functional limitation (57.3%). These included 904 cases (31.2%) where the ability to recognize potential hazards was the impediment, 921 cases (31.8%) where the ability to perform activities of daily living (eat, get dressed, hygiene, health care management) was the impediment, and 1,120 cases (38.7%) where the ability to manage their own money, do banking, or balance a checkbook was the impediment.
- Overall, the largest functional limitation for PG1 cases with a plan date during FFY 2023 and 2024 was Work Skills (92.5%). There are a variety of impediments that coincide with a Work Skills functional limitation.
- The largest selected functional limitation/impediment combination was Communication, where the impediment was receptive (hearing, reading, attention span, processing information). In total, 2,180 cases (75.3%) had this impediment to employment.
- During FFYs 2023 and 2024, 1,030 PG1 cases were marked as low income at IPE, making it the largest additional recorded barrier to employment for clients with the most significant disabilities at plan development.
- The leading primary impairments for PG1 cases with IPEs signed during FFY 2023 or FFY 2024 were cognitive impairments (34.5% of cases). In addition, 26.53% had a primary impairment in AWARE of Psychosocial or Other Mental Impairment.
- In total, 3,809 PG1 clients received services via a paid authorization in FFYs 2023 and 2024. High school transition was the most paid authorized service category, followed by Supported Employment and Maintenance (clothing, daycare, room and board, etc.). There is a need for more Supported Employment, Employment and Retention, and job placement specialists, particularly in rural areas.

- There is a need for more job openings and employers willing to employ individuals with disabilities.
- There is a need for better accessibility in digital job applications.
- There is a need for more mental health providers. Psychosocial or Other Mental Health Impairments are two of the most frequent primary impairments of PG1 clients, but Psychological Evaluations and Services were the most reported missing service in their areas by counselors.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

- When compared to the 2023 ACS estimates, no minority racial or ethnic groups were identified as being disproportionately underserved by OKDRS.
- For cases with Plans signed during FFYs 2023 and 2024, Cognitive Impairments were the leading primary impairment for every racial group and clients of Hispanic ethnicity.
- A higher percentage of American Indian/Alaska Native, Multiracial, and Hispanic clients had a Cognitive primary impairment than the other racial/ethnic groups, whereas a lower percentage of Black clients had a Psychosocial primary impairment.
- The overall successful closure rate during FFY 2023 and 2024 was 36.58%. The rate varied across the different racial/ethnic groups. It is important to identify which groups have outcome rates below the agency average and investigate ways to increase their closure rates.
- The successful closure rate for Black transition program participants during FFYs 2023-2024 was 25.94%, an increase of 8.49 percentage points from 17.45% during FFYs 2020-2021.
- A 2024 Annual Disability Infographic reported that nationwide, “Compared to all races, African American adults with disabilities are 22% less likely to be employed, 51% more likely to experience poverty, and 54% more likely to lack adequate housing” (Institute on Disability/UCED).
- 55.3% of Oklahomans who identify as Black and 47.2% of those who identify as Hispanic or Latino reside in Oklahoma City or Tulsa. While these areas have more services available and more job opportunities, the cost of living is higher.
- 24,935 of the 49,628 Oklahomans who identify as Native American or Alaska Native with a disability reside in Congressional District 2. The ACS data indicate there are important socio-economic, disability, and education factors that set Congressional District 2 apart from the rest of the state.
- There are 10 tribal vocational rehabilitation programs in Oklahoma. OKDRS employs a tribal liaison and strives to work with the tribal VR programs to co-provide services to Native American residents with disabilities.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

- For Program Year (PY) 2024, approximately 3.0% of OKDRS clients were co-enrolled with a Title 1 and/or Title III program through Workforce.
- OKDRS continues to work with Workforce on the star accessibility rubric. Due to the elimination of the Office of Workforce Development and the change in administrative

entities for WIOA to the Oklahoma Employment Security Commission, Phase II has not progressed as intended.

- OKDRS has partnered with the Central Workforce board for multiple summers to provide employment opportunities to youth with disabilities participating in the BEST STEP summer program.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER IDEA.

- As of October 2024, there were 31,729 students between the ages of 15 and 22 on an IEP in public school districts in Oklahoma. Specific Learning Disability is the largest primary disability on IEPs (45.2%). The second and third largest disability categories are Other Health Impairments (25.43%) and Autism (10.26%).
- There is room for improvement in partnerships with local education agencies (school districts). During the 2024 OKDRS Counselor survey, 39% of respondent counselors reported that less than 50% of the school districts in their area were actively referring transition-aged youth for DRS services. Despite this, OKDRS has continued to expand services to transition-aged youth.
- During the school year 2024-2025, OKDRS had contracts with 316 of the 435 public school districts with high schools in Oklahoma (72.6%). In addition, OKDRS had contracts with six career technology centers, four private schools, one of the Oklahoma juvenile corrections centers, and two public school cooperatives that provide special education services to public school districts that are cooperative members.
- Despite having 329 signed contracts, only 183 of the providers had a paid authorization for SWS (56%) during SFY 2025 as of July 17, 2025. In total, 786 transition students participated in SWS during the 2024-2025 school year.
- The SWS program has grown, and despite a dip in the post-COVID school years, the 2024-2025 participation count is 44% larger than the 2019-2020 count.
- Family participation continues to be a barrier faced by youth with disabilities. A 2024 survey of DRS's VR and SBVI counselors revealed that many parents/guardians of OKDRS clients under age 18 are not actively engaged in their youth's service and employment planning.
- Closure rates varied for the transition participant clients. Multiple factors, including those outside the control of OKDRS, can impact closure rates for different groups. It is important to identify which groups have outcome rates below the agency average and investigate ways to increase their closure rates.
- A 2024 Annual Disability Infographic entitled "Social Inequities Experienced by African Americans" reported that nationwide, "Compared to all races, African American students with disabilities are 21% more likely to spend time outside a regular classroom, four times more likely to be placed in a correctional facility, and 2% less likely to have completed high school" (Institute on Disability/UCED).
- Higher counts of Black and African American youth and Hispanic youth with an IEP are found in the Oklahoma City and Tulsa metro area school districts (as well as the Lawton school district). The Guymon, Enid, and Tahlequah school districts have a higher count

of Hispanic youth than other rural areas. Students on an IEP who are English Language Learners (ELL) are more likely to be found in the Oklahoma City and Tulsa metro area school districts. A moderate number are also found in the Tahlequah and Guymon school districts.

- Higher counts of Native American youth with IEPs are more dispersed around the state. Epic Charter School has the highest number of enrolled Native American youth, followed by the Tahlequah School District. Schools around Tulsa and rural school districts in the eastern part of Oklahoma have the highest counts of Native American youth. Some districts around the Oklahoma City metro and Lawton also have moderate counts of Native American youth with IEPs. Overall, Native American youth with IEPs are more likely than other minority youth to be students in rural districts.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

- As of April 24, 2025, OKDRS has contracts with 31 Community Rehabilitation Providers (CRPs), all providing Supported Employment services. There are five fewer Supported Employment providers than were available in 2021. In addition, eight of the 31 Supported Employment vendors were not accepting referrals as of April 24, 2025.
- Some rural regions of the state have either no CRPs or only limited availability to provide services to OKDRS clients. Clients in 54 of Oklahoma's 77 counties received Supported Employment services during FFYs 2023 and 2024 (70%). The missing counties are service deserts and primarily occur in Southeastern and Western Oklahoma.
- During May of 2024, the OKDRS Commission voted to increase the CRP contract rates by 10% starting in FY 2025. This was the first increase since 2009. The agency plans to review the rates every two years. In addition to the 10% increases, in June 2025, the DRS Commission approved increases to three specific milestones starting in FY 2026.

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

The goals and priorities have been jointly developed with the Oklahoma Rehabilitation Council (SRC). The DSA participates in quarterly SRC meetings and has assigned representatives for each SRC committee listed below. All DSA committee representatives participate in a yearly strategic planning session with the SRC to identify jointly developed goals and priorities.

- Executive Committee: Outreach to businesses and disability organizations to educate on DSA programs, services, and activities and role of SRC; Participation with DSA Workforce System Activities. Program and Planning Committee: Data and Findings of Customer satisfaction Surveys and State performance accountability measures/assessment.
- Advocacy Committee: Policy public hearings; Promotion of client success stories; Meet the Legislative Candidates forum; Collaboration on legislative packets for state and federal legislative visits and Oklahoma Disability Awareness Day at State Capitol.
- Transition Committee: Participation on Oklahoma Transition Institute; Update the Transition Planning Folder and tools for disability support organizations; Collaborate on Statewide Assessment on needs assessments of individuals with disabilities for transition career services and pre- employment transition services, including services under IDEA.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

1. Goal- Increase number of successful employment outcomes for consumers with disabilities

Measure: Increase employment rate outcomes from 49% to 52%

Strategies:

- Continue to effectively manage the opening of Priority Group 1 and two and release clients off Priority Group three as resources allow. (DVR/DSBVI)
- Collect and use information from surveys, studies and data to evaluate program effectiveness and implement improvements. (DVR/DSBVI)

- Improve community outreach and service delivery in underserved areas of the state through business services, training programs, the OLBPH, and counselor outreach. (DVR/SBVI)
- Collaborate with other state agencies and organizations to increase service provision for individuals with disabilities in rural areas. (DVR/SBVI)
- Expand Business Services Program and regional liaisons to improve employer relationships. (DVR/DSBVI)

2. Goal: Create and leverage partnerships to maximize resources that reflect the needs of consumers with disabilities

Measure: Use feedback from required and periodic surveys to address changes in technology and business practices and increase research collaboration with stakeholders both internally and externally.

Strategies:

- Career guidance and counseling based upon job opportunities and labor market statistics.
- Engage consumers in preparation for employment.
- Consumer Employment Outcomes.
- Continue to attend Community Outreach events.
- Consumer's soft skills.
- Expand mental health partnerships.
- Input from blind consumer groups on their perceptions of quality outcomes
- Conduct Vendor training on blindness specific job placement and supports

3. Goal: Support DRS Transition staff with statewide efforts to enhance transition activities and services for transition aged youth in secondary settings to increase successful employment outcomes. While keeping counselors and techs engaged and motivated about Transition work, we will also inform and encourage staff. (CSNA)

Measure: Continue expansion of Pre-ETS transition programs in 2026 and 2027 by increasing the number of students from 3,700 students served statewide in 2025.

Strategies:

•Objective 1:1 – Increased awareness and collaboration of transition resources to DRS Transition staff, community agencies, and schools in the state of Oklahoma.

1. Activity 1 – Visit field offices, schools, community agencies, and other venues to increase the number of resources for DRS Transition Staff. Assist schools with transition and resource fairs.

2. Activity 2 - Provide support and technical assistance (TA) to OU Pre-ETS staff, OU Work Skills Trainers, Central Oklahoma Workforce Innovation Board (COWIB) Work Skills Trainers, Central Technology Center, and Kiamichi Technology Center.
3. Activity 3 - Support partnerships throughout the state including Oklahoma Transition Council (OTC), Oklahoma Family Network (OFN), Transition Teams through the OTC, Oklahoma Rehabilitation Council (ORC), Oklahoma State Department of Education (OSDE), Workforce Boards, DDS, and many others.
4. Activity 4 - Monthly distribution of Transition Newsletter to all appropriate stakeholders.
5. Activity 5 – Participate and present at conferences, transition and resource fairs, and other transition events statewide.

•Objective 1:2 – Support community, family, student, and employer engagement efforts to enhance awareness for transition aged youth.

6. Activity 1 - Partner and join meetings with the Business Services Program (BSP) at DRS, Workforce offices, and other employers to expand the job bank for students' work-based learning opportunities in the summer and throughout the school year. Participate in job fairs, etc.
7. Activity 2– Collaborate with Project SEARCH sites to support monthly meetings, quarterly meetings, and interview processes. Support Project SEARCH Statewide Coordinator with the growth and expansion of the program.
8. Activity 3– Support all Inclusive Post-Secondary Education (IPSE) programs statewide.
9. Activity 4 – Participate and support Tribal VR, underserved populations, homelessness, foster care, juvenile justice, and individuals receiving mental health services.

•Objective 1:3 Actively participate on the Oklahoma Transition Council.

10. Activity 1– Support and participate in the Oklahoma Transition Institute (OTI) Regional Team meetings with various teams throughout the state. Present at OTI about the different programs that DRS provides.
11. Activity 2 – Collaborate with OU Transition Teams Statewide Coordinator to share information about the progress of team plans for OTC, including best practices in an online collaboration space.

•Objective 1:4 Increase School Work Study (SWS) and Work Adjustment Training (WAT) opportunities for schools statewide.

12. Activity 1 - Guide and assist counselors to discuss with students, teachers, and parents, the various programs within the school districts. Support school staff in the education of SWS and WAT alongside the counselor. Create opportunities for schools and students to incorporate SWS and WAT within their school system.

Goal 4: Support students with disabilities with statewide efforts to enhance transition to increase successful employment outcomes.

1. Activity 1 – Develop, implement, encourage, and support BEST STEP programs in the state during the summer months. Provide staff, Pre-ETS, Work Skills Trainers, community providers, and community agencies with TA and support for successful camps statewide.

2. Activity 2 – Collaborate with Sky’s the limit communications and associates on a yearly basis to support and engage students from OSB and OSD regarding self-advocacy, self-determination, and financial literacy.
3. Activity 3 – Collaborate with Mathnasium to support and engage students gaining financial literacy training.
4. Activity 4 – Collaborate with and utilize OU Pre-ETS to provide Pre-Employment Transition Services to schools statewide.
5. Activity 5 – Utilize Central Technology Center (Sapulpa) and Kiamichi Tech Pre-ETS to continue providing Pre-Employment Transition Services to schools in the districts that are sent into their Tech Centers.
6. Activity 6 - Develop, implement, encourage, and support STEM camps and Down Syndrome-specific STEM camps, in the state during the school year and summer months. Provide staff, Pre-ETS, Tech-Now, community providers, and community agencies with TA and supporting delivery of camps statewide.
7. Activity 7 - Develop, implement, encourage, and support VIBE camp during the summer months. Provide staff, Pre-ETS, community providers, and community agencies with TA and support for successful camps.
8. Activity 8 – Develop, implement, encourage, and support both Oklahoma School for the Deaf (OSD) and Oklahoma School for the Blind (OSB) with new programming opportunities for students.

4. Goal- Increase Community Rehabilitation Providers (CRPs) providing supported employment services particularly in rural areas of the State. Some rural regions of the state either have no CRPs or only limited availability to provide services to DSA clients. (CSNA)

Strategies:

- Continue to effectively manage the Opening of Priority group 1 and 2 and release clients off Priority group 3 monthly as resources allow.
- Continue to evaluate CRP contract rates and provide increases as allowable.
- Regular meetings with providers.
- Continue partnership with DHS/DSDD to sign up dual vendors to work with both programs.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

The goals and priorities in carrying out the VR and Supported Employment programs are continuing for the next program year, but strategies for goals have been revised based on current progress or change in strategies to meet the goal.

Goal 1: Deliver quality opportunities for employment, independent living and economic self-sufficiency to Oklahomans with disabilities. - **Continuing**

Priorities:

- Increase consumer access to affordable assistive technology (AT) to help remove barriers to employment. (DVR/SBVI)
- Increase number of blind and visually impaired employed in state government by 10%. (SBVI)- Revised for PY 2024 into broader effort to address recruitment and retention of qualified Rehabilitation counselors.
- Increase consumer access to affordable assistive technology (AT) to help remove barriers to employment. (SBVI)
- Conduct employer informational meetings on assistive technology in the workplace. (SBVI)

Progress:

- AT lab acquiring updated demo equipment.
- Created Assistive Technology outreach presentation with demo devices and handouts.
- Purchased updated lab equipment.
- Obtained demo equipment from AbleTech.
- Consultation and assessments provided to Mercy Hospitals by our Assistive Technology team.

Goal 2: Services to Students and Youth with Disabilities- Continuing

Priorities:

- Expand and improve vocational rehabilitation services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities.
- Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain an employment outcome.

Progress:

- Pre-ETS services continue to be expanded throughout the state. The transition team continues to encourage participation by state career techs to help expand the opportunities and training available to students.
- New transition folders were created, printed, and distributed through a partnership between OKDRS, OKSDE, ORC, and AbleTech. A new format has been distributed is easy to read and will have more resources for parents.

- Discussions have taken place between OKDRS staff and career tech staff to encourage more career techs to become supported employment vendors. This effort is ongoing.

Goal Area 3: Create and leverage partnerships to maximize resources that reflect the needs of consumers with disabilities- Continuing

Priorities:

- Effectively engage and work with all community partners such as Workforce, Higher education, State executive branch, etc., who have common interests and goals related to employment to increase competitive integrated employment outcomes.

Progress:

- The DSA collaborates with partners to expand opportunities for apprenticeships and other work-based learning experiences in coordination with workforce development boards and industry associations.
- The Business Services Programs is integrating virtual tools and hybrid engagement methods to meet employer needs.
- Building Employment Skills for Today and Summer Transition Employment Program (BEST STEP) continues to grow. Transition served over 400 students in the BEST STEP program during the summer of 2025 with 32 locations, 289 students working in STEP summer internships, and 38camp locations.
- Expanding co-enrollment strategies with WIOA partners such as Workforce Development Boards, Adult education and Job Corps
- Improving data sharing among partners by actively collaborating on the design and implementation of a new platform that will integrate workforce development data across WIOA core programs and partner agencies. This initiative aims to streamline data collection, reduce manual reporting and offer a more comprehensive view of service utilization and customer progress.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

The Designated State Agency (DSA) submits a quarterly report to its federal oversight agency, the Rehabilitation Services Administration (RSA), which includes Vocational Rehabilitation (VR) program data and the Participant Individual Record Layout (PIRL) elements required for joint annual reporting under WIOA. The DSA also submits the WIOA Statewide and Local Performance Report.

To ensure data accuracy and program effectiveness, DSA leadership established a Performance Review Team that meets monthly to analyze current data and performance indicators. DVR and SBVI leadership regularly collaborate to address federal reporting requirements and review key data elements. Targeted training and guidance on these critical elements are shared with field staff to support accurate and complete data collection and reporting.

Title IV- Vocational Rehabilitation Program Indicator	PY2024 State Negotiated Level	PY2024 Performance Outcomes
Employment (Second Quarter After Exit)	58.6%	51.9%
Employment (Fourth Quarter After Exit)	51.6%	49.3%
Median Earnings (Second Quarter After Exit)	\$5,331	\$6,827
Credential Attainment Rate	51%	48%
Measurable Skill Gains	72%	72.4%

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

Innovation and Expansion (I&E) funds were used to support activities of the State Rehabilitation Council and the Statewide Independent Living Council Resource Plan.

Total I&E Expenditures for FY 24 are \$197,137.70.

- Supporting State Rehabilitation Council Resource Plan are \$130,252.53.
- Supporting Statewide Independent Living Council Resource Plan- \$66,885.17

Total I&E Expenditures for FY 25 are \$231,028.57.

- Supporting State Rehabilitation Council Resource Plan-\$152,879.37.
- Supporting Statewide Independent Living Council Resource Plan- \$78,149.20

The DSA will support all innovation and expansion activities, in collaboration with the SRC. The activities will include:

- Executive Committee: Outreach to businesses and disability organizations to educate on DSA programs, services, and activities and role of SRC; Participation with DSA Workforce System Activities. Program and Planning Committee: Data and Findings of Customer satisfaction Surveys and State performance accountability measures/assessment.
- Advocacy Committee: Policy public hearings; Promotion of client success stories; Meet the Legislative Candidates forum; Collaboration on legislative packets for state and federal legislative visits and Oklahoma Disability Awareness Day at State Capitol.
- Transition Committee: Participation on Oklahoma Transition Institute; Update the Transition Planning Folder and tools for disability support organizations; Collaborate on Statewide Assessment on needs assessments of individuals with disabilities for transition career services and pre- employment transition services, including services under IDEA.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND
ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED
EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE
REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND
PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER
SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED
EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE
USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT
PROGRAM.

To continue to improve supported and customized employment services to individuals with the most significant disabilities in Oklahoma, the DSA will work closely with Community Rehabilitation Providers (CRP) staff to ensure that necessary services are being provided.

Goal: DSA will increase the utilization of Community Rehabilitation and Supported Employment providers to achieve employment outcomes of individuals with the most significant disabilities statewide.

Measure: Increase statewide availability and of supported employment contracts with Community Rehabilitation Providers from 27 current contracts in FY 26.

- Continue and expand outreach activities to recruit new CRPs to meet the needs of individuals with the most significant disabilities.
- Continue collaboration with Developmental Disability Services (DDS) to increase dual CRPs statewide to streamline services between the DSA and DDS.
- Update current required training and develop new training opportunities for supported employment providers including advanced and specialized trainings.
- Continue to work with current CRPs, state partners, DSA staff, and other interested parties to promote the need for additional CRPs in unserved or underserved areas of the state

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI
FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT
DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION
606(B)(3) OF THE REHABILITATION ACT, DESCRIBE THE QUALITY, SCOPE, AND EXTENT OF
SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST
SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES;
AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Supplemental employment services using Title I funds include assessment, career exploration, internship, and job development & placement. These services are available prior to starting a job for individuals seeking a supported employment outcome.

After job placement, a supported employment outcome-based contract is used to provide support services to adults and youth with the most significant disabilities. Community Rehabilitation Providers (CRPs) partner with DSA counselors to provide support on a case-by-case basis to ensure that the support needs of the individual are met. There are two levels of support available in the supported employment contract including regular and highly challenged support. The two levels of support give the DSA counselor and CRP the ability to provide the individual with the length and intensity of support and training needed to achieve a successful employment outcome. Employment support is provided to adults and youth with the most significant disabilities in supported employment in four (4) week increments as follows:

- Four (4) Weeks Job Support & Retention (SE R4) Milestone: (First Four (4) Weeks on the Job)
- Eight (8) Weeks Job Support & Retention (SE R8) Milestone: (Eight (8) Weeks on the Job, Cumulative)
- Job Stabilization (SE ST) Milestone: (Twelve (12) Regular or Sixteen (16) Weeks Highly Challenged, Cumulative)
- Successful Employment (SE EM) Milestone: (Additional Ninety (90) Calendar Days beyond Job Stabilization)

The type and extent of support and training needs of the individual will determine the total time spent onsite per contact each work week during each milestone. For adults and youth who need additional support to stabilize in employment, the Onsite Support and Training (SE OST) Milestone is available as needed, for a period generally not to exceed twenty-four (24) months after the individual's first day of employment, unless under special circumstances the individual and the DRS Counselor jointly agree to extend the time to achieve the employment outcome identified in the IPE.

During the Job Stabilization milestone, a required Team Meeting is conducted with the individual, DSA counselor, CRP, and any other relevant team members to review the individual's progress toward a successful employment outcome. The Team Meeting discussion also involves the available sources of extended services that best meets the individual's needs including natural supports, Developmental Disability Services (DDS), DSA extended services for transition-age youth, or others, if applicable. Extended Services are ongoing support services provided to individuals with the most significant disabilities, including youth with the most significant disabilities, after the time-limited vocational rehabilitation services have been completed and job stabilization has been achieved. They consist of specific services, including natural supports, needed to maintain the supported employment placement. Extended services are paid from funding sources other than DRS and are specifically identified in the IPE, except that DRS may provide and pay for Extended Services for Youth with the most significant disabilities for a period not to exceed 4 years or extend beyond the date when the youth reaches age 25.

The Extended Services for Transition (SE EST) Milestone is intended to meet the provision of up to forty-eight months of extended services for transition-age youth as needed, or until the youth reaches twenty-five (25) years of age, whichever occurs first.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

DSA enters into contractual agreements with CRPs for the provision of Supported Employment services. DSA continues collaboration with Developmental Disability Services (DDS) to increase dual CRPs statewide to streamline services between the DSA and DDS.

DSA staff continues outreach activities to recruit new CRPs to meet the needs of individuals with all disabilities served by DSA.

DSA maintains an MOA with the DDS to improve employment outcomes for individuals with intellectual disabilities. The MOA outlines the coordination of services and identifies the DSA as first dollar funding source for competitive integrated employment. DDS continues to provide extended services for individuals with intellectual disabilities in Supported Employment services by utilizing the DDS Home and Community Based Waiver (HCBW) and DDS state dollars. The HCBW is utilized to provide long-term ongoing support. DSA has maintained an MOA with DDS since 1989. Under the MOA, the HCBW is also utilized to provide pre-vocational services.

In Supported Employment, after stabilization is achieved, and up to 24 months of onsite supports and training are provided, the team identifies the individuals need and develops a plan for the transition to extended services. Extended services are additional support services provided to the individuals with the most significant disabilities. Up to forty-eight (48) months of extended services are available through the DSA for youth through age 24 as needed.

The DSA is contracted with qualified CRPs, known as the Contractor.

The VRTAC-QE in partnership with Virginia Commonwealth University assisted the DSA with revising the CE policy and contract, as well as developing updated CRP and DSA training to provide CE services. DSA intends to implement the new Customized Employment (CE) contract for the FY2025 in January 2025 contract year. VRTAC-QE is providing resources and partial funding for training in Customized Employment for DSA staff and CRP staff.

DDS provided funding is available for extended services after for DDS qualified individuals transitioning from DSA employment services.

Employers also provide Natural Supports as a resource for extended services for individuals placed through supported employment.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link](#) to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1-Most Significantly disabled	3,600	3,240	\$12,000,000	360
2- Significantly Disabled	4,600	4,140	\$12,000,000	460
3-Disabled	330	250	\$1,000,000	80

B. SUPPORTED EMPLOYMENT PROGRAM.

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link](#) to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1- Most Significantly Disabled	3,600	1,075	\$4,000,000	

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION
MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL

ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is implementing an order of selection with one priority category closed.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

(d) Need for Order of Selection. The Department, in consultation with the Oklahoma Rehabilitation Council, has determined, due to budgetary constraints or other reasoned limitations, that it cannot serve all individuals who are determined eligible for DVR and DSBVI services. The Department consults with the Oklahoma Rehabilitation Council (ORC) regarding the:

- (1) need to establish an Order of Selection, including any re-evaluation of the need;
- (2) priority categories of the particular Order of Selection;
- (3) criteria for determining individuals with the most significant disabilities; and
- (4) administration of the Order of Selection.

(e) Establishing an Order of Selection. Basis for Order of Selection. An Order of Selection must be based on a refinement of the three criteria in the definition of individual with a significant disability in section 7 (21) (A) of the Act and 34 CFRC.F.R. § 361.5(c)(30).

- (1) Factors that cannot be used in determining order of selection of eligible individuals. An Order of Selection may not be based on any other factors, including requirements identified in 34 CFRC.F.R. 361.36(d)(2)(i-vii).

DRS maintained waiting lists and transferred applicants to active caseloads on a monthly basis when budget, staffing and vendor resources became available. The DSA Performance Review Team meets monthly to specifically review consumer services activity. The three pillars of resources we review to open or close a group are budget, staffing and vendor resources. Budget appropriations remain flat, but sufficient funding is available for the current year. Staffing levels continue to be a concern, but it is anticipated that any influx of consumers can be absorbed into existing caseloads. Vendor resources have to do with the capacity of the service vendors we utilize for training and other services. We reached the point that all three resources are at sufficient levels to open priority group one on February 15, 2023 and priority group two on June 17, 2024. Opening group one and two has removed existing delays for the groups. The DSA will continue to monitor authorizations and may need to reduce services if the required match amounts remain unappropriated. The DSA will continue to release monthly from priority group three as resources allow.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST

SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

(2) It is the administrative rules of DRS to provide vocational rehabilitation services to eligible individuals under an Order of Selection. Under the Order of Selection, the Department has established three priority groups on the basis of serving first those with the most significant disabilities. Every individual determined to be eligible for DVR and DSBVI services is placed in the appropriate priority group based upon the documentation used to determine eligibility and/or vocational rehabilitation needs. Selection and placement in a priority group is based solely upon the significance of the eligible individual's disability, and is not based upon the type of disability, geographical area in which the individual lives, projected type of vocational outcome, age, sex, race, color, creed, religion, or national origin of the individual. The priority groups are:

(A) Priority Group 1. Eligible individuals with a most significant disability are individuals with the most significant barriers to employment. A most significant barrier is one that includes a severe mental or physical impairment resulting in serious limitations in three or more functional capacities and which can be expected to require multiple vocational rehabilitation services over an extended period of time.

(B) Priority Group 2. Eligible individuals with a significant disability are individuals with significant barriers to employment. A significant barrier is one that includes a severe physical or mental impairment resulting in serious limitations in at least one, but not more than two, functional capacities and which can be expected to require multiple vocational rehabilitation services over an extended period of time.

(C) Priority Group 3. Eligible individuals with disabilities not meeting the definition of individual with a most significant or significant barrier to employment.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

Closing and opening priority groups.

When a priority group is closed, designated cases within that priority group without a written IPE will be placed on a waiting list after the individual has been determined to be eligible. No IPE will be written for cases on the waiting list. Staff will continue to take applications, diagnose and evaluate all applicants to determine eligibility and vocational rehabilitation needs, find the individual eligible when documentation supports such a decision, then place each eligible individual's case in the appropriate priority group. If an eligible individual is placed in a closed priority group, his or her case will go on the waiting list and no IPE will be written or initiated. The DSA Director will notify DVR and SBVI staff in writing when all of a closed priority group is opened. When this directive includes new applicants who are found eligible, individuals already on the waiting list within that same priority group will be given priority over new applicants. When closed priority groups are opened, staff will contact individuals on the waiting list to

develop and implement their Individualized Plans for Employment using the following priorities:

1. contact individuals within the highest open priority group first, Most Significant being the highest of all priority groups; **2.** within each opened priority group, staff will contact individuals on the waiting list in order of application date, earliest application date first; then **3.** staff will contact individuals whose cases will remain on the waiting list to explain how their cases will be handled.

Continuity of services. Any individual with an IPE that existed prior to the date all or part of that individual's priority group was closed will continue to receive services as planned. Such an IPE may be amended if the changes are necessary for the individual to continue progress toward achieving an appropriate employment outcome or are otherwise necessary within policy. Persons requiring post-employment services will also be provided the necessary services regardless of priority group assignment.

Information and referral services will remain available to eligible individuals who are not in an open priority group. These individuals will be given information and guidance, using appropriate modes of communication, to assist such individuals in preparing for, securing, retaining or regaining employment, and will be appropriately referred to Federal and State programs (other than the vocational rehabilitation program) including other components of the statewide workforce investment system in the state. No IPE will be written to provide such services to these individuals.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

The DSA has not requested a waiver of statewideness.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to

ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—
 - A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND
 - B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;
 - C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link](#) to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Division Administrators	2	2	2
Field Coordinator	5	5	5
Programs Manager	21	21	23
VR Specialist-Counselor	102	111	120
VR Specialist-Vocational Evaluator	8	9	11
Assistive Technology Specialist	15	17	22
Rehabilitation of the Blind Specialist	10	10	10
Specialist on Deaf/Blindness	1	1	1
Orientation & Mobility Specialist	5	5	5

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

The DSA maintains a counselor to job seeker ratio of 1:97.

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

The DSA projects that 3,306 individuals with disabilities will be served for PY 2028.

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link](#) to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

There is one institution of higher education in Oklahoma that prepares Vocational Rehabilitation professionals by awarding Master's of Science Degrees with Vocational Rehabilitation Counselor emphasis. This program at Langston University is recognized by RSA as a historically black college/university (HBCU) and is Council on Rehabilitation Education (CORE) accredited. Graduating from a CORE accredited program automatically qualifies its graduates to test for the Certified Rehabilitation Counselor (CRC) certification so all the graduates have the credentials necessary for taking the CRC exam, thereby meeting the DSA's CSPD standard of a qualified rehabilitation professional.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
East Central University	Clinical Rehabilitation and Clinical Mental Health Counseling Program	45	15
Langston University	Rehabilitation and Disability Studies Program	94	31

B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY AND INSTITUTIONS OF HIGHER EDUCATION AND PROFESSIONAL ASSOCIATIONS TO RECRUIT, PREPARE, AND RETAIN PERSONNEL WHO ARE QUALIFIED,

INCLUDING PERSONNEL FROM MINORITY BACKGROUNDS AND PERSONNEL WHO ARE INDIVIDUALS WITH DISABILITIES.

As a strategy to increase recruitment and retention of a diverse professional counselor staff from traditionally underrepresented and underserved populations, The DSA employs a recruitment and outreach coordinator who is responsible for recruitment from all entities nationwide including colleges, organizations, and other entities that work with Counselors, professional level jobs, and jobs for specialized fields such as Assistive Technology, Counselors in rural areas and vocational evaluators, services for people who are Deaf or Hard of Hearing, people who are Deaf/Blind and those who work in the vending and/or merchandising machines/warehouse field.

The recruitment and outreach coordinator interacts with HR to make sure announcements are posted in a variety of national venues; utilizes a variety of methods to source diverse applicant pools (e.g. social media, professional networks, advertisements, job fairs); conducts screening interviews to assess the qualifications of applicants; recruiting and sourcing of appropriate applicant pools and assures onboarding is processed both efficiently and timely. Other duties also include completing job classification audits and job evaluations; analyzes staffing patterns; salary analyses; compiling, analyzing, and making written recommendations.

The Recruitment and Outreach coordinator participates in career days and does class presentations designed to extenuate the positive value of DSA employment to students enrolled in CORE-accredited masters of rehabilitation counseling programs. During such presentations, the Recruitment and Outreach Coordinator discusses the State of Oklahoma's low 221 cost of living, the potential benefits contained in the State's employee compensation package and the State of Oklahoma's Internship Program (a paid internship training program). The aforementioned activities are accomplished on a national basis, with a particular emphasis, at colleges and universities which serve predominantly student populations from traditionally underserved and underrepresented populations.

Moreover, these activities occur at colleges and universities, which include but are not limited to: Historically Black Colleges and Universities (HBCUs), such as, Langston University, Southern University (Baton Rouge, Louisiana), and South Carolina State University; Historically Spanish-Serving Colleges (HSCs), such as, University of Texas Rio Grande Valley (formerly, Pan American), University of Texas El Paso, California State University San Bernardino and the University of New Mexico-Highlands; and, Historically Native American Colleges, such as the Cheyenne and Arapaho Tribal College (Weatherford), the College of the Muscogee Nation (Okmulgee, Oklahoma), the Comanche Nation College (Lawton, Oklahoma), the Pawnee Nation College (Pawnee, Oklahoma), Bacone (Muskogee, Oklahoma) and the University of Arizona (Tucson). Moreover, the assigned Project Coordinator and other DSA staff will engage in outreach activities with colleges and universities which have special emphasis on programs serving individuals who are blind or visually impaired, such as, Louisiana Tech University-Ruston, University of Arkansas-Little Rock, University of Illinois at Urbana-Champaign, and Mississippi State University's National Research and Training Center on Blindness & Low Vision. Also, the Recruitment and Outreach coordinator engages in outreach activities with colleges and universities that have rehabilitation counseling programs geared to serve individuals who are deaf or hard of hearing, such as, Western Oregon University and Winston-Salem University. Finally, the Recruitment and Outreach coordinator counsels with potential interns and

institutional instructional staff about the requirements for obtaining paid internship and performs liaison activities with the universities such as coordinating letters of support from the DSA for their grant writing efforts.

A variety of methods are used to address our current and projected needs for qualified rehabilitation personnel. Methods used include annual reviews of existing data, workforce planning using an established model, conducting outreach and networking, and the utilization of a Recruitment and Outreach Coordinator position that focuses on recruitment of individuals with disabilities.

GOAL: Using existing data and an established workforce planning model to identify current status and predict future needs of qualified rehabilitation personnel.

ACTIVITY

- Identify current staff capacities and compare to future needs to identify gaps
- Initiate actions to fill the gaps through staff development, capacity building, and recruitment efforts

GOAL: Expand applicant pool for VR Counselor positions.

ACTIVITY

- DSA has staff utilizing Agency's Educational Sponsorship Program.
- To alleviate difficulties experienced with applicants being determined for CSPD eligible when applying for a VR Specialist II or above position, the Job Family Description clarifies that graduates of a Council on Rehabilitation Education (CORE) accredited master's program are to be deemed eligible without further review.

GOAL: Retention of qualified rehabilitation professionals.

ACTIVITY

- Provide for personal and professional growth by providing in-service development opportunities that enhance their knowledge, skills, and abilities.
- Continue to offer a skill-based pay adjustment for obtaining a professional certification or licensure appropriate with their position.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND

PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

Bi-annually a comprehensive needs assessment is performed to offer continuing educational and in-service opportunities for the DSA professional and paraprofessional staff. The DSA facilitates professional development opportunities that are relevant and timely and ensures that agency staff are provided the tools necessary to deliver quality services to consumers that fulfill their expressed needs.

Vision

Providing opportunities for all DRS employees to learn, grow and lead.

What We Do

The Oklahoma Department of Rehabilitation Services (DRS) Professional Development staff provides on-going training and professional development for DRS employees at all levels. Professional development isn't a one-time thing; it is a continuous process. Assessment and improvement of skills increases employee value, enhances careers prospects, and cultivates the ability to serve DRS clients.

Our team identifies conferences, workshops, courses and webinars applicable to DRS employee's growth and then makes them available to staff. In addition, the Professional Development Training Specialists develop and facilitate curricula pertinent to key areas of professional growth.

Training opportunities are offered to staff in areas of:

- Academy-Introduction to DRS entities and extensive training for VR/SBVI new employees.
- ADA Training-History and overview of the Americans with Disabilities Act (ADA) as well as other topics pertinent to the ADA.
- Caseload Management- essential functions of caseload/workload management, skills and styles of managers, decision making, and time management.
- Core Competencies: 7 Habits of Highly Effective Managers, Crucial Accountability, Crucial Conversations, Stress Management and Emotional Intelligence.
- PMP for Employees- Performance Management Process (PMP) training focusing on the 3 phases of the process, how to summarize accountabilities and rate behaviors, and elements needed in the Employee Development Plan.
- Presentation Skills- The purpose of this workshop is to provide an opportunity for an individual who conducts training, gives presentations or who facilitates groups to fine tune his or her ability to successfully design, develop support materials for, and deliver a presentation with confidence.
- Certified Public Managers Program
- Autism

- Transition/ Pre-employment transition services
- Ethics
- Workforce Partnership
- Professional Conferences
- Deaf/Hard of Hearing
- Assistive Technology
- Leadership
- Hope Training
- New Employee Academies
- Job Development
- VR 101 Training
- Blindness Immersion Training
- Mental Health and the impact of Mental Illness on the Rehabilitation process.
- National Rehabilitation Leadership Institute

The DSA provides a complete professional development program to provide up to date information in the field of Vocational Rehabilitation. Research and details of significance are disseminated to all Professional and Paraprofessional staff and the DSA leadership participates in the Spring National Council on Rehabilitation Education (NCRE) Conferences and the Fall and Spring Conferences for the Council of State Administrators of Vocational Rehabilitation where research and federal requirements are presented.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFESSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

The DSA is committed to ensuring its workforce is highly skilled, professionally trained, and prepared to serve Oklahomans with disabilities with the highest quality service delivery.

The DSA requires and follows the Comprehensive System of Personnel Development (CSPD) standard for all existing staff and qualified applicants for VR Counselor positions and adheres to

the highest personnel standard that will ensure professional staff are adequately trained and prepared for employment. DSA employees with Education and/or certification standards applying for employment must meet Oklahoma's personnel standards prior to appointment, including proof of possession of degree, certification, licensing and registration requirements applicable for each position.

All applicants for the positions of Vocational Rehabilitation Specialist, Field Services Coordinator and Programs Manager are reviewed by the DSA expert on CSPD utilizing the CRC guidelines, the LPC Academic guidelines and Worksheet, and the CVRT guidelines to evaluate eligibility and sit for certification. Standards reviewed by the CSPD expert are identified in the state approved job specifications include certification, licensing and registration requirements for the following:

The DSA expanded the degree fields accepted for entry level, hard to fill professional positions (Vocational Rehabilitation Specialist, Rehabilitation of the Blind Specialist, Assistive Technology Specialist, Vocational Evaluator).

Vocational Rehabilitation Specialist

1. Education and Experience requirements: Level 1: Requirements at this level consist of a bachelor's degree in vocational rehabilitation, vocational evaluation, psychology, or counseling; OR a bachelor's degree and one year of paid or unpaid experience in a disability related field. Level II-IV- consist of a master's degree in rehabilitation counseling or human resources with a rehabilitation counselor major that has been awarded by a program accredited by the Council on Rehabilitation Education (CORE); OR any master's degree and is eligible to sit for the certification/licensure exam specific to the professional job duties such as the Certified Rehabilitation Counselor (CRC), the Licensed Professional Counselor (LPC), Certified Vocational Evaluator (CVE), or the Professional Vocational Evaluator (PVE) certification.

Programs Manager

Education and Experience Requirements: Level I - required at this level consists of a master's degree and one year of professional supervisory, managerial, consultative or administrative experience in public health administration, social work, child support, adult protective services, child welfare, guidance and counseling, nursing, developmental disabilities, probation and parole, employment services, public administration, community- based prevention and diversionary youth services programs, juvenile justice, rehabilitation or disability services or counseling, or vocational evaluation or vocational rehabilitation, or an equivalent combination of education and experience, substituting one year of professional level experience in the above listed areas for each year of the required education. Preferred Qualifications: Prefer applicant who currently holds a Certified Rehabilitation Counselor (CRC) and/or Licensed Professional Counselor (LPC). Selective Qualifications: Application must include transcript which shows master's degree has been awarded and any current Certified Rehabilitation Counselor (CRC), Licensed Professional Counselor (LPC) or documentation of eligibility to sit for above certifications.

Field Services Coordinator

Education and Experience Requirements: Master's degree in Rehabilitation Administration, Rehabilitation Counseling, Vocational Evaluation, Vocational Rehabilitation, Public Administration or a disability related field and three (3) years supervisory experience. The successful candidate will need to possess a strong working knowledge of vocational rehabilitation services, principles and practices, and a strong background in working with individuals with disabilities. Preference may be given to candidates who are certified Rehabilitation Counselors (CRC), Licensed Professional Counselors (LPC), Certified Vocational Evaluators (CVE) or Certified Public Managers (CPM) and have 3 years of supervisory experience.

B.) All staff members have access to internal and external training designed to develop the knowledge and skills necessary to achieve success in their positions and enhance service delivery for customers. Trainings are delivered through classroom, webinar, and teleconference.

New VR and SBVI staff are provided access to the DRS Academy SharePoint site. This site houses the onboarding training process, which currently is comprised of four sections.

AWARE Training

Staff are provided access to a training environment to learn basic navigation and skills to use the AWARE case management system. This training has four AWARE Training manuals, each created to provide position specific instruction:

Core (C): This is for AWARE users who are not Counselors, Rehabilitation Technicians, or Instructional Staff for Older Blind cases. This version provides a basic overview that applies to all AWARE users.

Rehabilitation Technician (RT): This version includes instruction and guidance typically related to Rehabilitation Technician duties.

Vocational Rehabilitation Counselor (VRC): This version contains instruction and guidance on Counselor related activities.

Older Blind (OB): This version contains instruction and guidance for Instructional Staff working Older Blind cases.

VR 101 Training Modules

This course is targeted towards Counselors, yet the information throughout is beneficial to all staff within the Vocational Rehabilitation and Services for the Blind and Visually Impaired Divisions. This course was developed through a partnership between DRS, The Center for Innovative Training in Vocational Rehabilitation (CIT-VR) at George Washington University, and the San Diego State University Interwork Institute. This training grant ends in 2024 so Professional Development staff are currently working to update and migrate the content into the Workday system.

Academy Videos Course

The videos within this course are designed to provide new staff with an overview of the agency & services, introduce agency partners, and provide reference guides for various protocols and processes. Content areas include:

Agency Overview

General Onboarding

Disability Orientation

SBVI Programs and Services

Partners

In-Person Academy Session

This three-day, in-person session is held in Oklahoma City and focuses on case processes, application to closure, and provides an opportunity to ask questions, network with colleagues, and put learning into practice.

This Academy is open to VR and SBVI counselors, rehabilitation technicians, instructional staff, and managers, with allowances for additional positions to attend on a case-by-case basis.

This session focuses on hands-on activities and scenarios to drive learning through engagement.

Training ends with a Q&A session with the Field Service Coordinators to cover any unanswered areas from the session.

Blindness Immersion Training is for SBVI employees to experience simulated daily living as a blind individual and includes SBVI field staff (Counselors, Rehabilitation Techs, PMs and Instructional staff). The training consists of stations set up for participants to be introduced to specific assistive technology devices and to practice skills under blindfold such as writing, counting money, kitchen activities such as cutting, chopping, pouring, sweeping and also Orientation and Mobility exercises such as using a cane and human guide exercises. The activities included eating lunch while blindfolded as well.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL ARE ABLE TO COMMUNICATE IN APPROPRIATE MODES OF COMMUNICATION WITH OR IN THE NATIVE LANGUAGE OF APPLICANTS OR ELIGIBLE INDIVIDUALS WHO HAVE LIMITED ENGLISH SPEAKING ABILITY.

Interpreter Services Unit

The former Services to the Deaf and Hard of Hearing Unit is now the Interpreter Services Unit and includes both the Interpreter Certification & Resource Center (ICRC) program and internal DRS interpreter scheduling and contracts. The ICRC is the state's credentialing body for sign language interpreters, supporting certification, continuing education and interpreter registry functions. This program also supports and promotes the interpreter profession by providing resources, training, and interpreter mentorship. The Interpreter Service Program maintains interpreter contracts and schedules American Sign Language interpreters and Communication Access Real-time Translation (CART), a real time captioning service, as needed for agency staff and for consumers.

Hispanic Community Outreach

This office is dedicated to providing Vocational Rehabilitation and Transition services for youth to Spanish-speaking individuals with disabilities in the Hispanic Community. Staff assist by translating and facilitating access and facilitating access to job training, education and employment services for Hispanic job seekers

Foreign Language Translation and Interpreter Services

To ensure effective communication with the public, including applicants and eligible individuals with disabilities, the DSA utilizes a statewide contract with Foreign Language Translation and Interpreter Services. Through this contract, a range of language supports is available, including bilingual oral interpretation, written translation, and American Sign Language interpreting.

The DSA also provides informational materials on our website in multiple accessible formats, including standard print, large print, braille-ready files, audio, and languages other than English. Translation services are additionally available online to support user needs.

5. AS APPROPRIATE, DESCRIBE THE PROCEDURES AND ACTIVITIES TO COORDINATE THE DESIGNATED STATE UNIT'S COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT WITH PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

The DSA coordinates its CSPD activities with those provided under the Individuals with Disabilities Education Improvement Act. The Transition Coordinator delivers training to all staff providing transition services and distributes transition newsletters in partnership with the Oklahoma State Department of Education. The DSA visits field offices, schools, community agencies, and other venues to increase the number of resources for DRS Transition Staff and assists schools with transition fairs. Shared training and conference opportunities with VR staff and educators are provided to staff in partnership with the Oklahoma Transition Council (OTC), Oklahoma Family Network, Transition Teams with OU staff, Oklahoma Rehabilitation Council (ORC), Oklahoma State Department of Education (OSDE) and Workforce Boards across the state.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

The DSA maintains a formal interagency agreement with the State Educational Agency (SEA) as well as relationships at the local level with LEAs. The formal interagency agreement was renewed in 2025.

The focus of our work will be to forage those relationships and partner with stakeholders to provide services to youth and students with disabilities to help them prepare for life after high school, including, but not limited to, further education/training, competitive integrated employment, independent living and social skills, self-determination, and self-advocacy. The DSA continues to perform outreach to underrepresented groups, such as those on Section 504

Plans, youth in foster care, adjudicated youth, out-of-school youth, and those with other disabilities not documented on a 504 or IEP.

The DSA has amended the transition and pre-employment transition policies. Transition services are further addressed in ODRS policy found at 612:10-7-240(a).

Overview of transition from school to work services

(a) Transition services is a coordinated set of activities for a student or youth with a disability who is 15 to 21 years of age and has been determined eligible for services that promotes movement from the public schools or recognized education program to post-school activities. Transition services represent the next set of services on the continuum of VR services available to eligible individuals. Transition services, for eligible students or youth with disabilities, provide for further development and pursuit of career interests with postsecondary education, vocational training, job search, job placement, job retention, job follow-up, and job follow along. The transition process is outcome based, leading to post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and/or community participation consistent with the informed choice of the individual.

(b) The Transition from School Work Study (SWS) is implemented through an MOU with the State Department of Education (SDE) and through cooperative agreements between DRS and each participating local secondary school district, private school, charter school, home school organization, Career and Technology Education Center, or other recognized education program. The Transition Coordinator in the DRS State Office acts as liaison with the State Department of Education and provides statewide coordination and technical assistance for the Transition from School Work Study program.

(c) Transition services must be based on the individual student's or youth's needs, considering individual preferences and interests. Transition planning will include, to the extent needed, services in the areas of:

- (1) instruction;
- (2) community experiences;
- (3) development of employment and other post-school adult living objectives, including job skill training available through vocational-technical schools;
- (4) if appropriate, acquisition of daily living skills and a functional vocational evaluation;
- (5) that promotes or facilitates the achievement of the employment outcome identified in the student's or youth's individualized plan for employment; and
- (6) that includes outreach to and engagement of the parents, or, as appropriate, the representative of such a student or youth with a disability.
- (7) supported employment services 34 CFR 361.5 (c) (54) (iii-v) and supplemental employment services

(d) The Transition from School Work Study is based upon effective and cooperative working relationships between the Special Education Section of the State Department of Education, the

Department of Rehabilitation Services, and the Local Educational Agency (LEA) or recognized education program. Each agency retains responsibility for providing or purchasing any transition service that the agency would otherwise provide to students or youth with disabilities who meet the eligibility criteria of that agency.

Pre-Employment Transition Services

The Workforce Innovation and Opportunity Act (WIOA) amended the Rehabilitation Act of 1973 and requires VR agencies to set aside at least 15% of their federal funds to provide or arrange for pre-employment transition services (Pre-ETS) to students with disabilities who are eligible or potentially eligible for VR services. In collaboration with the local educational agencies or a recognized education program, OK DRS shall provide or arrange for the provision of pre-employment transition services (Pre-ETS) for all students with disabilities in need of such services who are eligible or potentially eligible for services. The primary purpose of Pre-ETS is to help students begin to explore and identify career interests and to practice and improve workplace skills in preparation for transition to employment and/or post-secondary education.

Target Population. Pre-ETS are provided for "students with disabilities" who are 14 to 21 years of age and who are:

- (1) Eligible for VR services; or potentially eligible for VR services (i.e., all students with disabilities, including those who have not applied or been determined eligible for VR services).

Definitions:

(1) Pre-Employment Transition Services

- (A) Pre-employment transition services are a specific set of services that are designed to improve the transition of students with disabilities from school to post-secondary education or to an employment outcome, increase opportunities for students with disabilities to practice and improve workplace readiness skills, through work-based learning experiences in a competitive, integrated work setting and, increase opportunities for students with disabilities to explore post-secondary training options, leading to more industry recognized credentials, and meaningful post-secondary employment.
- (B) Pre-employment transition services represent the earliest set of services available for students with disabilities who are eligible or potentially eligible for VR services, are short-term in nature, and are designed to help students identify career interests, which may be further explored through additional vocational rehabilitation (VR) services, such as transition services and other individualized VR services and, are provided to all who meet the definition of a student with a disability who may need such services.
- (C) Pre-employment transition services include a specific set of activities that can only be provided to those individuals who meet the definition of a student with a disability and must be available statewide to all students with disabilities in the state who may need such services under section 113 of the Rehabilitation Act and 34 C.F.R. § 361.48(a) and include:
 - (I) Five Required Activities (section 113(b) of the Act and 34 C.F.R. 361.48(a)(2));

- (II) Four Pre-employment Transition Coordination Activities that are essential for arranging and providing pre-employment transition services (section 113(d) of the Act and 34 C.F.R. § 361.48(a)(4)), and;
 - (III) Nine Authorized Activities (section 113(c) of the Act and 34 C.F.R. § 361.48(a)(3)) VR agencies may use if they have sufficient funds.
 - (IV) A more detailed description of these required, coordinated, and authorized activities is provided further below.
- (2) A "Student with a Disability" as defined in Oklahoma:
- (A) A student with a disability is an individual with a disability who is:
 - (I) Currently enrolled in a secondary, post-secondary, or other recognized educational program;
 - (II) Not younger than fourteen years of age and not older than the maximum age established for the receipt of services under part B section 614(d)(1)(A)(i)(VIII) of the Individuals with Disabilities Education Act (IDEA) (codified at 20 U.S.C. section 1414(d)(1)(A)(i)(VIII)); and
 - (III) Receiving special education or related services under part B of IDEA or is a student with a disability for the purposes of section 504 of the Rehabilitation Act of 1973, as amended.
- (d) Required Five Activities. Pre-employment transition services may be provided to students, or groups of students, with disabilities who are eligible or potentially eligible for VR services in the following areas. The following pre-employment transition services represent the earliest set of services available for students with disabilities under the VR program. These services are designed to be short-term, based on the student's needs, and designed to help students identify career interests:
- (1) Job exploration counseling.
 - (2) Work-based learning experiences, which may include in-school or after school opportunities or experience outside the traditional school setting, including internships, that are provided in an integrated environment to the maximum extent possible.
 - (3) Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs at institutions of higher education.
 - (4) Workplace readiness training to develop social skills and independent living.
 - (5) Instruction in self-advocacy, including instruction in person-centered planning, which may include peer mentoring, including peer mentoring from individuals with disabilities working in competitive integrated employment.
- (e) Auxiliary aids or services. Any "student with a disability" with a sensory or communicative disorder who needs auxiliary aids or services to access pre-employment transition services, regardless of whether the student has applied or been determined eligible for the VR program.
- (1) The provision of pre-employment transition services to pay for auxiliary aids and services for students with disabilities with sensory and communicative disorders who need such aids and services in order to access or participate in pre-employment transition services.

(2) DRS will collaborate with education agencies to identify who is responsible for the purchase of auxiliary aids and services based on whether the aids and services are needed for FAPE or for VR purposes and access to Pre-ETS. If it is determined to benefit both the VR program and the IDEA services, then VR can only pay for the portion of the cost that benefits the VR program. The VR agency may use the funds reserved for Pre-ETS to pay for auxiliary aids and services when they are needed to access or participate in pre-employment transition.

(3) DRS does not need to conduct a search for comparable services and benefits for potentially eligible students with disabilities, including when providing auxiliary aids and services. The search for comparable benefits and services is required for eligible students with disabilities, except to the extent that these aids and services constitute "rehabilitation technology." (34 C.F.R. 361.5(c)(45).

(f) Delivery of Services. Pre-ETS may be delivered in collaboration with school districts/LEAs or a recognized education program via any combination of:

(1) Vocational rehabilitation counselors

(2) The vocational rehabilitation counselor will coordinate Pre-ETS with other entities who maybe delivering these services.

(3) Other entities contracted with VR such as:

(A) Community Rehabilitation Programs

(B) Independent Living Centers

(g) Considerations under 00S. VR must continue to provide Pre-ETS to students with disabilities who were receiving such services prior to being determined eligible for VR services and are placed in a closed category.

(h) Four Pre-employment Transition Coordination Activities that are essential for arranging and providing pre-employment transition services (Section 113(d) of the Act and 34 C.F.R. § 361.48(a)(4)):

(1) District office staff, or staff of a recognized education program, will be responsible for attending IEP meetings for students with disabilities when invited; using conference calls and video conferences, when necessary;

(2) working with local workforce development boards, job centers and employers to develop work opportunities for students with disabilities, including apprenticeships, internships, summer employment and other employment opportunities available throughout the school year;

(3) working with schools to coordinate and ensure the provision of Pre-ETS; and

(4) attending person-centered planning meetings for individuals with developmental disabilities receiving SSI-D/Medicaid when invited.

(i) Nine Authorized Activities. Through its fiscal forecasting, DRS will determine annually whether there are sufficient funds available to engage in authorized activities and charge these costs to the reserve. DRS may provide the nine authorized activities to improve the

transition of students with disabilities from school to post-secondary education or an employment outcome. There is no requirement that DRS wait until all students with disabilities have received direct services before it can spend funds on other authorized activities, rather, that funds remain to engage in authorized activities. (section 113(c) of the Act and 34 C.F.R. 361.48(a)(3)).

(1) Implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces.

(2) Developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently; participate in post-secondary education experiences; and obtain, advance in and retain competitive integrated employment.

(3) Providing instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting students with disabilities.

(4) Disseminating information about innovative, effective, and efficient approaches to improve the transition of students with disabilities from school to post-secondary education or an employment outcome.

(5) Coordinating activities with transition services provided by local educational agencies or a recognized education program under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.).

(6) Applying evidence-based findings to improve policy, procedure, practice, and the preparation of personnel, in order to better improve the transition of students with disabilities from school to post-secondary education or an employment outcome.

(7) Developing model transition demonstration projects.

(8) Establishing or supporting multi state or regional partnerships involving states, local educational agencies, recognized education programs, designated state units, developmental disability agencies, private businesses, or other participants to improve the transition of students with disabilities from school to post-secondary education or an employment outcome.

(9) Disseminating information and strategies to improve the transition to post-secondary activities of individuals who are members of traditionally unserved and underserved population.

(j) Eligible students with disabilities are able to access any other VR services needed to participate in pre-employment transition services or other VR services that are unrelated to pre-employment transition services, none of which would be available to them without approved IPEs, these eligible students with disabilities may need certain VR services to fully benefit from pre-employment transition services. By receiving other VR services and supports, along with the pre-employment transition services, it enables eligible students with a disability to develop the skills to experience competitive, integrated employment as they leave school and enter the workforce.

(1) Should a student with a disability apply for and is determined eligible and assigned a disability priority category that is closed, they may continue to receive any of the 5 required Pre-ETS services if they had begun to receive at least one Pre-ETS service prior to being determined eligible and assignment to a priority category. However, these students may not receive any VR services other than pre-employment transition services until they apply, and are determined eligible, for VR services, and have an approved IPE. (See 612 10.7-25.1 for more information on OOS).

Eligible students with disabilities, that is, those students who have applied and been determined eligible for the VR program, are able to receive any VR services, including pre-employment transition services, necessary to assist them in achieving their employment outcome, so long as those services are identified on their IPEs.

(k) Coordination and Collaboration with Education: The Oklahoma State Department of Education (OSDE) and the Department of Rehabilitation Services (DRS) have created a Memorandum of Understanding (MOU) to form a partnership aimed at supporting youth with disabilities across Oklahoma. This MOU focuses on ensuring a free appropriate public education (FAPE) and includes coordination for timely provision of necessary transition services. Through this partnership, DRS staff are assigned to schools or recognized education programs throughout the state, ensuring a direct point of contact with OSDE staff. The collaboration aims to enhance the goals, initiatives, objectives, and activities of the Oklahoma Pathways to Partnerships (OP2P) grant. The ultimate objective is to improve education and training, employment, independent living, and community participation outcomes for children and youth with disabilities.

(1) The Department of Rehabilitation Services (DRS) in Oklahoma has specialized staff dedicated to working with targeted populations to provide tailored support and services. These populations include Deaf and Hard of Hearing, Services for the Blind and Visually Impaired, Juvenile Justice, and bilingual staff. By having specialized staff for these groups, DRS aims to provide comprehensive and accessible services tailored to the unique needs of each population.

(2) Decisions as to which entity, the VR agency, LEA, or a recognized education program, is responsible for providing and/or paying for pre-employment transition services or transition services considered to be both a special education (or related service or VR service must be made at the State level). Nothing under title I of the Rehabilitation Act shall be construed as reducing a LEA's obligation to provide special education or related services under IDEA (see section 101(c) of the Rehabilitation Act and 34 C.F.R. § 361.22(c)). DRS Counselors, the Statewide transition coordinator, and their State and Local Education agency partners or a recognized education program will coordinate services and make determinations on an individual basis based upon the purpose of the service, eligibility for services, and who customarily provides the services.

Cooperative agreements for transition services

Cooperative agreements are entered into by the DSA and the Local Educational Agency (LEA), private school, charter school, home school organization and Career and Technology Education Center to facilitate cooperative working relationships leading to positive employment outcomes for eligible students with disabilities, including those served through an individualized

education program (IEP), Section 504 Plan, or those with other documented disabilities. Each agreement sets the framework for a comprehensive and coordinated effort to identify and serve all students with physical and/or mental disabilities enrolled in secondary school or attending CareerTech during secondary school or being home schooled who are jointly eligible. Continuous and uninterrupted services are provided through common areas without duplication or encroachment of the separate programs.

Confidentiality of Records

Only the information directly related to the administration of the individual's transition program are to be released to the LEA. The cooperating agencies will allow each other to copy information under guidelines established for participating and/or cooperating agencies under SDE and DSA regulations.

Coordination of Individualized Education Program and Individualized Plan for Employment

The Local Educational Agency and the DSA must document coordination of objectives and services planned in an individual's IEP/Section 504 Plan and IPE. Both documents, as well as other case documentation, must reflect the effective interaction of the two agencies in providing the services necessary for a smooth transition from school to work. While it is understood that it is not possible for a VR counselor to attend all formal IEP/Section 504 Plan meetings in assigned schools, the counselor will collaborate in transitional planning in the most effective manner possible.

2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES.

OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

The DSA updated the SEA agreement on November 3, 2025. The formal interagency agreement with the State educational agency provides for: consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post- school activities, including vocational rehabilitation services; transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs under section 614(d) of the Individuals with Disabilities Education Act [20 U.S.C. 1414(d)]; the roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; and procedures for outreach to and identification of students with disabilities who need the transition services.

In response to the federal statutory and regulatory requirements, the SEA and the DSA agree to the following Consultation and Technical Assistance responsibilities:

The DSA will assist the SEA, LEAs, charter, private, virtual, and home school organizations in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services. Consultation and technical assistance may be provided through alternative means, such as conference calls, video conferences, and written communication. Additionally, the DSA will offer such technical assistance to other state agencies and organizations and parents of students and youth with disabilities.

The DSA will provide:

1. interpretation of laws pertaining to vocational rehabilitation, employment, and disabilities as it relates to transitioning youth and students with disabilities to life after high school;
2. technical assistance documents to assist schools and the SEA in collaboration and provision of transition services to students and youth with disabilities (e.g., forms to document transition services completed to assist with the requirements set forth in WIOA regarding the movement of a youth or student with a disability to subminimum wage employment);

3. to the SEA on an annual basis or when requested a list of DSA staff territories by school and county;
4. sample goals to be used in the annual transition goal areas of education/training, employment, and independent as developed and revised around the VR services or transition services in general; and
5. input on presentation materials, handbooks, data collection and reporting, and as requested by the SEA.

The DSA will coordinate services with local educational agency staff to help prepare youth and students with disabilities for competitive integrated employment. DSA staff will share results of the vocational evaluation and other assessments, as well as progress reports for various work experiences with school personnel for the purpose of including information in the IEP and transition planning process. The DSA will work with school personnel to not only have input into the IEP process but also to access a copy of the IEP for assistance with coordination with the VR IPE. On behalf of the DSA, the OSDE distributes information regarding policy and procedures of the IEP planning process as needed. The DSA maintains a shared document with OSDE to document DSA counselors and the schools they serve. This is updated quarterly and shared with OSDE along with a Transition newsletter.

The DSA and educational officials will provide the following types of services:

- Consultation and technical assistance services to assist State educational agencies and local educational agencies in planning for the transition of students with disabilities from school to postsecondary life, including employment.
- Transition services to youth with disabilities and students with disabilities, for which a vocational rehabilitation counselor works in concert with educational agencies, providers of job training programs, providers of services under the Medicaid program under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.), entities designated by the State to provide services for individuals with developmental disabilities, centers for independent living (as defined in section 796a of this title), housing and transportation authorities, workforce development systems, and businesses and employers.

The DSA will assist the SEA, LEAs, charter, private, virtual, and home school organizations in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services. Consultation and technical assistance may be provided through alternative means, such as conference calls, video conferences, and written communication. Additionally, the DSA will offer such technical assistance to other state agencies and organizations and parents of students and youth with disabilities.

DSA will provide interpretation of laws pertaining to vocational rehabilitation, employment, and disabilities as it relates to transitioning youth and students with disabilities to life after high school; technical assistance documents to assist schools and the SEA in collaboration and provision of transition services to students and youth with disabilities (e.g., forms to document transition services completed to assist with the requirements set forth in WIOA regarding the movement of a youth or student with a disability to subminimum wage employment; to the SEA on an annual basis or when requested a list of DSA staff territories by school and county; sample goals to be used in the annual transition goal areas of education/training, employment, and

independent as developed and revised around VR or transition services in general and input on presentation materials, handbooks, data collection and reporting as requested by the SEA.

The DSA and OSDE will collaborate on working with VR staff and LEA staff to facilitate completion of a comprehensive and quality Individualized Education Program (IEP) and Individualized Plan for Employment (IPE) that appropriately includes transition planning and coordination of services.

The OSDE will continue to enforce the IDEA requirements regarding inviting those agencies responsible for providing or paying for transition services, including referral to VR.

The OSDE will:

1. provide to the LEAs a referral form to VR through the state IEP development system;
2. educate LEAs on the best practices for inviting VR and other transition providers to participate in the development of the IEP and participate through multiple means (e.g., in person, by phone, virtually, by providing documents in advance) in IEP and other meetings;
3. continue to monitor the involvement of invitations to, and referrals to VR through the state monitoring system, Indicator 13 checklist, Indicator 14, and other means as decided. The DSA will continue to enforce the WIOA requirements regarding attending IEP and other meetings (when invited) as well as the process for receiving and responding to referrals, including referral to VR.

The DSA will:

- Provide to the OSDE the content to be included in the referral to VR form
- Train its staff on the requirements of receiving the referral form along with the release of confidential information from LEAs and other referral sources
- Train its staff to develop internal procedures with each school for how referrals will be submitted to the local VR counselor
- Train its staff on best practices for engaging with schools and teams, planning and attending IEP and other meetings, to participate in the development of the IEP and participate through multiple means (e.g., in person, by phone, virtually, by providing documents in advance)
- Train its staff on providing regular updates to the referring source on the status of that referral, if the student/family applied for services, if a plan for employment is in place, what services may be implemented at school, etc.
- Encourage its staff and schools to take advantage of the online VR application to streamline the application process, possibly in lieu of even a referral
- Continue to educate and encourage its staff to actively contribute to the development of annual goals and coordinated services to be included in the IEP to help the student reach his or her postsecondary goals

- Train its staff to assist schools in developing annual IEP goals around the VR services provided to support the achievement of the IEP and IPE goals; and work with the OSDE and LEAs to improve documentation of the collaborative transition service delivery occurring for a student by encouraging wording in the IEP.

The OSDE will continue to educate LEAs on the required provision of secondary transition services as described in the IDEA, such as: a) Community Experiences, b) Development of education/training, employment, and other adult living goals and/or objectives; c) Annual transition assessments; and d) Coordination of services with other agencies who may provide and/or pay for transition services.

The OSDE will ensure LEAs recognize and take into consideration the responsibilities of the LEA to provide such services in preparation for working with VR on services requiring rehabilitation. This includes ensuring schools meet their requirements of providing special education and related services to support the students in reaching their educational goals, including their post-secondary goals. The OSDE will ensure LEAs understand Section 101(c) of WIOA that states "Nothing in the Act is to be construed as reducing the responsibility of the local educational agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

The DSA and OSDE will collaborate on ensuring education officials, school personnel, and VR personnel are cross-trained, have opportunities for networking and collaboration, and receive consistent messages and guidance from the DSA and OSDE.

The DSA will continue to coordinate with non-educational agencies to reach out-of-school youth to support them in their employment efforts. This includes collaboration with subminimum wage employers, workforce development boards, Oklahoma Department of Mental Health and Substance Abuse Services, mental health providers, community rehabilitation providers, Oklahoma Department of Human Services, Developmental Disabilities Services, Office of Juvenile Affairs, Oklahoma Parents Center, Oklahoma Family Network, Oklahoma Autism Network, Down Syndrome Association of Central Oklahoma, Disability Coalitions, and other stakeholders.

Pre-ETS – The DSA will collaborate with the Oklahoma State Department of Education Special Education Services (OSDE) and The National Center for Disability Education and Training, University Oklahoma Outreach (NCDET, OU), Central Technology Center, Kiamichi Technology Center, as well as local education agencies and other recognized education programs in Oklahoma to make Pre-Employment Transition Services (Pre-ETS) available to high school students with disabilities.

DSA will ensure the pre-ETS collaboration model will assist in developing clear communication between DRS and the local/state education agencies; identify and address community needs related to student skill development; partner with Vocational Rehabilitation (VR) counselors and other community members in the provision of career development and work experiences; and strengthen the lives of students and their families.

DSA will ensure collaboration of these agencies, to enhance the identification of student career interests and needs; awareness of the variety of options and the role of post-secondary education and training; broaden perspective of personal skills to utilize, reinforce and develop

for work as well as self-awareness; and increased communication with family about student's progress and needs.

The DSA and the partners named above will:

1. Emphasize the provision of services to students and youth with disabilities to ensure they have opportunities to receive the training and other services necessary to achieve competitive integrated employment.
2. Expand the population of students with disabilities who may receive services and the kinds of services that the VR agency may provide to WIOA potentially eligible youth and students with disabilities.
3. Knowledge opportunities to practice and improve workplace skills, such as through internships and other work-based learning opportunities.

The DSA and OSDE will collaborate on performing outreach statewide to identify students with disabilities in need of transition services under IDEA and pre-employment transition services under WIOA, those residing in rural areas, and those low-incidence populations, such as blindness and hearing impairments. The DSA and OSDE will collaborate on joint community and professional presentations to educate and inform LEAs, parents, and others about reaching the needs of youth and students on Section 504 Plans and those with documented disabilities not being served through an IEP or Section 504 Plan. The DSA will work with the Oklahoma Rehabilitation Council's Transition Committee, Oklahoma School for the Blind, and Oklahoma School for the Deaf to conduct outreach activities. This may include, but is not limited to, developing, and disseminating public service announcements, making presentations within these schools and LEAs, hosting events for groups of students with disabilities (e.g., advocacy, summer programs, and STEM).

The OSDE will work with the IDEA B Advisory and LEAs to conduct outreach activities. This may include developing and disseminating public service announcements, making presentations within LEAs, and disseminating written information. For the purposes of Child Find, outreach, and identification of need for transition services and Pre-ETS, the OSDE will provide to the DSA annual special education Child Count data after October 1 (as completed and available) broken down by county, district name, disability, age, and grade. For the purposes of improving outcomes of students and youth with disabilities, the OSDE will provide annually to the Oklahoma Transition Council data and reports related to Indicators 13 and 14 of the State Performance Plan.

The DSA will provide to the OSDE:

- A list of all LEAs, private schools, charter schools, virtual schools, and Career and Technology Education schools with whom they contract with for School Work Study; Work Adjustment Training; Tech-Now; Project SEARCH; and other transition programs.
- A list of all LEAs participating in summer programs, such as BEST, STEP, ACE Academy, VIBE, STEM Camp, and others.

The DSA collaborates with the OSDE to access information from the Accessible Instructional Materials (AIM) Center located at the Oklahoma Library for the Blind and Physically Handicapped (OLBPH). Such information may include, but is not limited to, students with

disabilities accessing services and materials through the AIM Center. The OSDE will purchase materials and equipment for the AIM Center to disseminate as requested by LEAs to assist students with visual impairments and blindness. The AIM Center, through the DSA, will provide to the OSDE assurance they will conduct inventory control with procedures in place to track items in stock, items checked out, items returned, items still outstanding, lost or damaged items, etc. The AIM Center, through the DSA, will provide to the OSDE information regarding: a list of LEAs accessing materials and equipment purchased through the OSDE; and the number of students utilizing the provided materials and equipment.

The DSA and OSDE collaborate to ensure roles, responsibilities, and financial responsibilities between LEAs and DSA are communicated to LEAs and DSA staff to assist in provision of transition services to youth and students with disabilities. LEAs are responsible for providing and paying for all services identified as needed for the youth or student that is part of achieving the goals identified on their IEPs and related to their success in school or beyond. Section 101(c) of WIOA makes clear that. "Nothing in the Act is to be construed as reducing the responsibility of the local educational agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities."

LEAs are responsible for providing a) Academic instruction; b) Special education and related services (e.g., speech therapy, occupational therapy, physical therapy, special transportation); c) Accommodations; d) Assistive Technology (AT).

The DSA and OSDE will ensure LEAs and VR staff understand how to document the coordination of and provision of services between the VR counselor and LEA. In the event a dispute should arise regarding whose responsibility it is to pay for or provide a similar transition service, the VR staff and LEA staff may, as an initial step, reach out to the DSA and OSDE Transition Specialists to obtain guidance regarding how to make the decision. Any services required for providing Free Appropriate Public Education (FAPE) are the responsibilities of the LEA. To assist teams in making such decisions, the DSA and OSDE recommend the team consider: (1) The purpose of the service; (2) Customary services; and (3) Eligibility.

Because the definition of a "student with a disability," for the VR program includes an individual with a disability for purposes of section 504 of the Rehabilitation Act, it is broader than the definition under IDEA, VR is authorized to provide transition services to this broader population of students with disabilities than LEAs under IDEA. Since the VR program may serve students with disabilities, including those individuals with a disability for purposes of section 504 of the Rehabilitation Act, these students may not have an IEP under IDEA, and, therefore, would not be eligible for or receiving special education and related services under IDEA.

The OSDE continues to educate LEAs on the availability of VR services for students with disabilities on section 504 plans and encourage the referral of such students to the VR counselors. In addition, the Rehabilitation Act also allows the VR agency to provide pre-employment transition services to "potentially" eligible students with disabilities. This may include those students who are not receiving special education and related services under an IEP, students who are not receiving services or accommodations under a section 504 plan, and who have documented disabilities (e.g., scoliosis, mental health, a student may wear a hearing aid, have chronic health issues, such as asthma, leukemia, diabetes, suffer from depression, bipolar, and anxiety).

The DSA interacts with the SEA and LEAs to identify youth and students with disabilities in the public-school systems. The DSA will perform outreach to charter schools, virtual educational programs, homeschool networks, and other partners to identify youth and students with disabilities who need transition services. The DSA utilizes annual Child Count Information from the SEA to help identify low incidence disabilities across the state. This information is provided to the DSA Process Improvement Unit to conduct surveys as needed.

DRS has service and documentation responsibilities regarding pre-employment transition services and/or transition services. (2) Documentation process- Such process shall require that— (A) in the case of a student with a disability, for documentation of actions described in subsection (a)(2)(A)— (i) if such a student with a disability receives and completes each category of required activities in section 733(b) of this title, such completion of services shall be documented by the designated State unit in a manner consistent with this section; (ii) if such a student with a disability receives and completes any transition services available for students with disabilities under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.], including those provided under section 614(d)(1)(A)(i)(VIII) (20 U.S.C. 1414(d)(1)(A)(i)(VIII)), such completion of services shall be documented by the appropriate school official responsible for the provision of such transition services, in a manner consistent with this section; and (iii) the designated State unit shall provide the final documentation, in a form and manner consistent with this section, of the completion of pre-employment transition services as described in clause (i), or transition services under the Individuals with Disabilities Education Act as described in clause (ii), to the student with a disability within a reasonable period of time following the completion; and (B) when an individual has completed the actions described in subsection (a)(2)(B), the designated State unit shall provide the individual with a document indicating such completion, in a manner consistent with this section, within a reasonable time period following the completion of the actions described in this subparagraph.

The OSDE is the agency responsible for ensuring that each local educational agency (LEA) provides FAPE to eligible students pursuant to the IDEA, 20 U.S.C. §1412(a)(1). The ODRS is the designated agency responsible to ensure the provision of vocational rehabilitation services in Oklahoma. The IDEA, at 20 U.S.C. §1412(a)(12), and the Rehabilitation Act at 29 USC Section 721(a)(11)(D)), require states to have in place an agreement or mechanism to: identify the state agency responsible to provide services that are also special education or related services to ensure a free appropriate public education; specify the terms and conditions under which responsible agencies reimburse local educational agencies for providing certain services that are special education and related services; resolve interagency disputes regarding financial responsibilities for special education and related services or vocational rehabilitation services; and coordinate the timely provision of transition services, which may also be special education and related services or vocational rehabilitation services.

Subminimum Wage Assurance- In accordance with WIOA 34 CFR 397.31, the ODRS and OSDE agree that neither the OSDE nor LEAs will enter a contract or other arrangement with an entity, as defined in WIOA 34 CFR 397.5(d), for the purpose of operating a program under which a student or youth with a disability is engaged in work compensated at a subminimum wage.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

The DSA has formalized a Business Services Program with increased capacity to connect and sustain partnerships with Oklahoma businesses by delivering a skilled and loyal workforce. These partnerships lead to competitive integrated employment and career exploration opportunities for jobseekers with disabilities.

The DSA Business Services Program defines and customizes services for employers, creates strategic partnerships to support workforce needs, and has established an employment-focus within the rehabilitation process.

DRS's focus is to inform businesses about the benefits and opportunities associated with a workforce that is diverse and inclusive, and support business to develop that workforce. DRS values employer input into the VR program. DRS and workforce partners engage in activities that include employer input on workforce topics. Within the core services to business, DRS contributes by:

- (1) Informing businesses about the DRS talent pool and the full offerings of DRS programs, services, and incentives.
- (2) Informing employers about opportunities to provide work-based learning and career exploration options to students and youth through internships, on the job work experiences, and pre-employment transition services.
- (3) Enabling employers to recruit, job match, hire, train, and retain qualified talent from the DRS talent pool.
- (4) Connecting employers to community resources that support individuals with disabilities.
- (5) Providing consultation, technical assistance, and support to employers on workplace accommodations, assistive technology, and accessibility.
- (6) Providing information and consultation regarding employment of people with disabilities, including the benefits/return on investment of enhancing diversity in the workplace, disability awareness, and the Americans with Disabilities Act.
 - (A) Assist employers in identifying and preparing individuals with disabilities to fill job vacancies through on the job training.
 - (B) Informing employers about available tax incentives for hiring qualified persons with disabilities.
 - (C) Assist employers with identifying and setting up Apprenticeship opportunities for persons with disabilities.

Utilization of Statewide Partners

The DSA Business Services Program retains local business services specialists that work in geographical areas across the state. The specialists connect with local businesses to deliver a skilled and loyal workforce and partner with local workforce development boards.

Strategic Alliances & Intel

The DSA's ability to coordinate with local, state and federal entities is imperative for success. Community and economic development partners are the best link to disseminating the DSA's message to employers. Many of whom are federal contractors, especially in manufacturing. These partners potentially hold the key to the resources necessary in order to facilitate the DSA mission of increasing quality employment opportunities for job seekers with disabilities.

Regional Approach

In order to facilitate a regional approach, the DSA utilizes the regional alignment of federal and state partners. DSA staff coordinate with workforce development boards, small business development centers (SBDCs), and local businesses and employers.

Internal Coordination

Dissemination of information and the ability to coordinate and communicate with all DSA field staff responsible for job development activities is critical to the overall success of efforts in achieving goals regarding statewide outreach to businesses and statewide partners.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

As the federally funded Assistive Technology Act Program for the State of Oklahoma, the mission of Oklahoma ABLE Tech is to get assistive technology 'AT' into the hands of Oklahomans with disabilities through activities that provide increased access and acquisition. The DSA has a long-standing history of working closely with Oklahoma ABLE Tech to enhance the provision of assistive technology services across the state.

The DSA and Oklahoma ABLE Tech, Oklahoma's AT Act Program have an agreement to provide programmatic technology accessibility details regarding the DSA Access for All initiative under the Workforce Innovation and Opportunity Act (WIOA). The DSA is leading the Oklahoma Workforce System towards enhanced accessibility and Access for All was adopted by the workforce system statewide. This initiative is in partnership with Oklahoma ABLE Tech within programmatic accessibility, with a goal of creating fully accessible workforce services for Oklahoma job seekers.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

No current interagency agreement

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

Oklahoma Office of Juvenile Affairs

The DSA partners with the Office of Juvenile Affairs (OJA) to co-locate a VR counselor within the Central Oklahoma Juvenile Center to work with youth with disabilities. The DSA also partners to co-locate a VR counselor who is dedicated to working in the OJA facilities and through the Oklahoma Department of Human Services facilities including group homes, short-term and long-term facilities, and treatment centers. Vocational Rehabilitation Counselors connect with youth upon intake, encourage application at appropriate ages, complete vocational evaluations, and provide additional services to youth transitioning out of the facilities. We work closely with the Office of Juvenile Affairs to assist youth with accessing resources that are needed to increase their chances of successful employment and decrease the recidivism rate upon release.

Oklahoma Commission on Children and Youth, Oklahoma Department of Human Services, Oklahoma Office of Juvenile Affairs

In FY 26, The DSA has partnered with the above entities to increase youth opportunities for successful transition into adulthood through support and solutions. The MOU will increase and strengthen services for youth in OJA and/or DHS custody residing in group homes, detention centers and other alternative facilities. The DSA will assist to identify potential youth and provide a staff member who will serve as direct liaison with all parties and work closely with the DSA Transition Coordinator.

4. STATE USE CONTRACTING PROGRAMS;

The State of Oklahoma recognizes the value of people with significant disabilities by utilizing an established State Use Program that provides jobs for people with significant disabilities in producing products and services that can be purchased from a state contract for state use. The jobs range from products sorting and repackaging to the provision of services such as janitorial, maintenance, security, lawn care, and trash pickup. Each vendor in the State Use program must demonstrate that a minimum of 75% of their work force is comprised of persons with severe disabilities. By state statute, the Director of the Department of Rehabilitation Services, or a representative designated by the Director, serves on the executive committee of the Oklahoma State Use Program. Currently, this committee position is held by the Division Administrator of Services for the Blind and Visually Impaired. The State Use Program maintains a recognized portal system for purchasing. All state agencies are required to purchase off of the portal contract before seeking goods or services elsewhere.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

The Oklahoma Health Care Authority (OHCA) serves as the Medicaid Agency for provisions of title XIX of the Social Security Act. The OHCA and Department of Human Services (DHS) maintain an MOA for provision of services. The DHS administers waiver programs which include extended services as a part of the waiver. Each Medicaid waiver individual plan includes outcomes which would create a pathway to achieve competitive integrated employment. Increased education and in-service with contractors has occurred to encourage

dual contracts with the DSA and DDS to ensure a broader range of resources and streamlined access to competitive integrated employment opportunities.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

DSA maintains a Memorandum of Agreement (MOA) with the DDS to improve employment outcomes for individuals with intellectual disabilities. DDS continues to provide extended services for individuals with intellectual disabilities in Supported Employment services.

In May 2022, there were over 5,100 families awaiting developmental disabilities services. The legislature appropriated \$32.5 million to end the DDS wait list and increase provider rates. As a result the DSA and DHS/DDS expanded our partnership and cross trainings. The DSA Division Administrators met with administrators from DDS to develop a plan of action to cross train staff on each agency process, develop forms that would be helpful in the new process and develop the actual processes to refer clients from the DDS waitlist to DSA counselors. The new process has allowed clients to receive services sooner and/or to have no break in services when being transferred. The process also includes monthly meetings with DDS employees and DSA employees who are involved in the process to discuss, and problem solve all issues as they arise.

Additional initiatives include:

- Working with mutual clients in our systems, by providing information and training to vendors that serve each Agency. The DSA is providing trainings to vendors so they understand the differences in referrals, expectations, payment venues and reporting to each agency. This partnership has added 11 DDS Vendors to the DSA agency vendors.
- Regular meetings with DSA programs managers, DSA programs field representatives and DDS staff. Monthly meetings address and solve problems identified by field staff of both agencies. Training to staff is based on challenges identified. DSA staff also provide individual case consultations at the request of the Community Rehabilitation Programs (CRP), DDS staff and/or DSA staff.
- DSA staff work with DDS and State Employment Learning Network (SELN) to help with how to facilitate Supported Employment between the agencies such as sequencing and braiding of services.
- DSA Programs Field Representatives serve on the Developmental Disabilities Advisory Council. As a result of the Employment First initiative, Oklahoma passed the Employment First Act on November 01, 2015. DSA Employment Support Services (ESS), State level Transition, and DDS staff continue to work together to promote Employment First for all.
- DSA ESS staff and State level Transition Staff participate on the State Employment Leadership Network (SELN) - through monthly virtual meetings and the Annual SELN meeting in Alexandria, VA. DSA ESS staff also represents DSA on the Oklahoma Developmental Disabilities Council.
- DDS Staff serves on the Oklahoma Transition Council (OTC) resulting in statewide conferences, resources, technical assistance, and additional professional development

opportunities. The DSA Statewide Transition Coordinator works with DDS staff to ensure staff from each agency, schools, families, and CRPs understand the changes in WIOA regarding sub- minimum wage, are well-trained, and that Pre-Employment Transition Services are provided to students with disabilities accessing Vocational Rehabilitation services through the DSA.

The DSA ESS staff work with DDS staff to ensure that dual CRPs with sub-minimum wage employees are provided with ongoing career counseling and information and referral services required by WIOA. In addition, the DSA and DDS work together to confirm that any youth with a most significant disability receives career counseling, information and referral services, pre-ets services, and completes the DSA application and eligibility process before being hired in subminimum wage employment. The DSA continues to provide the annual WIOA 511 meetings to individuals in subminimum wage employment to make sure they have access to opportunities for achieving competitive integrated employment.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

The DSA maintains a Memorandum of Agreement (MOA) with the Oklahoma Department of Mental Health Substance Abuse and Services (ODMHSAS) to improve the employment outcomes of individuals with serious mental illness. The DSA has a second MOA for the Partnership for Infant's, Children's, Youth's and Young Adult's Mental, Emotional and Behavioral Health. The partnership ensures the creation and efficient operation of a unified and integrated system of care for all of Oklahoma's infants, children, youth, and young adults with or at risk for mental, emotional, and behavioral disorders (MEB's). This includes an array of prevention, education, outreach, service and support for them and their families.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

Thunderbird and Crossroads Clubhouses

The DSA maintains contracted agreements with the Thunderbird Clubhouse in Norman and Crossroads Clubhouse in Tulsa, both of which are certified through the International Center for Clubhouse Development (ICCD). The contractual agreements are for establishing employment services for DSA clients with severe mental illness for the purpose of obtaining or maintaining competitive integrated employment.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

Community Rehabilitation Service Providers

DSA has contracts with private non-profit, for-profit, and government CRPs to provide supported employment and other employment services to individuals with the most significant and significant disabilities, and those not meeting the definition of most significant or significant, with barriers to employment. CRPs provide supplemental employment services (pre-employment), supported employment, customized employment, employment and retention (i.e. short-term job support), job placement, and support services for employment (community integration) to DSA job seekers based on their support needs.

Potential new CRPs must meet the eligibility requirements to begin contracting with the DSA. Current CRPs can renew contract services each year after providing the required

documentation to DSA ESS staff for review and approval. CRPs provide services based on established criteria and milestone rates outlined in each contract.

DSA will continue with efforts to increase CRPs to meet statewide needs with a focus on rural areas. The Employment Support Services Unit (ESS) provides contracting requirements for potential CRPs and trains DSA field staff and existing CRPs on contract changes each year DSA will continue with efforts to increase employment CRPs to meet the needs statewide focusing in rural areas. The Employment Support Services Unit (ESS) educates potential CRPs and DSA field staff of available contracts.

Centers for Independent Living

The DSA is committed to working with the Centers for Independent Living (CILs) and the Statewide Independent Living Council (SILC) to improve relationships and assurances between the SILC, CILs and DSA.

DSA Roles include: Serve as fiscal intermediary to receive, account for, and disburse funds received by the State to support Independent Living Services - Continue to educate the CILs and SILC about the components, requirements and limitations of the contract and purchasing systems. - Attendance of Director and/or designee at quarterly SILC meetings. - Attendance of the DSA director and/or designee in major SILC and CIL meetings where services are discussed and planned - DSA (administration, accounting, and legal) will meet annually (or as needed) with the SILC Executive Board to address issues and difficulties – DSA will support the nomination and appointment process for the SILC in the State – DSA will cooperate in creating and signing the State Plan for Independent Living agreeing to serve as the DSA.

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.

The State Plan must include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the

The State Plan must include
case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

The State Plan must include
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.
4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).

The State Plan must include
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA^[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

^[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Oklahoma Department of Rehabilitation Services

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

^[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

^[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

^[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Oklahoma Department of Rehabilitation Services

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Melinda Fruendt

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Executive Director

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Melinda Fruendt
Title of Signatory	Executive Director
Date Signed	February 27, 2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the

first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	53.0%		53.1%	
Employment (Fourth Quarter After Exit)	51.7%		51.8%	
Median Earnings (Second Quarter After Exit)	\$5,427		\$5,500	
Credential Attainment Rate	51.1%		51.2%	
Measurable Skill Gains	72.5%		72.6%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The Mission of the Department of Rehabilitation Services is to empower Oklahoman's with disabilities. The Oklahoma Department of Rehabilitation Services (DRS) expands opportunities for employment, independent life and economic self-sufficiency by helping Oklahomans with disabilities bridge barriers to success in the workplace, school and at home. We embrace the journey in our belief in service to others so that they can improve their lives. We strive to continually improve relationships with consumers and bring awareness to how quality Vocational Rehabilitation Services impact Oklahomans with disabilities, their communities and State.

Vocational rehabilitation services are provided by the Division of Vocational Rehabilitation and the Division for Services for the Blind and Visually Impaired to help eligible individuals achieve employment outcomes that are consistent with the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of each eligible individual. VR services for individuals are meant to result in competitive employment in an integrated setting. Vocational rehabilitation services include services for individuals and services to groups of individuals and are provided statewide.

The agency is committed to equitable access and actively advocates on behalf of individuals with disabilities through active participation on multiple boards and committees statewide. The agency designates representatives who serve on State and Local Workforce Boards and to coordinate training and strategies in support of making one-stop American Job Centers and technology accessible to individuals with disabilities, as described in 29 CFR part 38, the implementing regulations of WIOA sec. 188. The Access for All initiative within Oklahoma Works places a focus on recruitment, hiring, and promotion of individuals with disabilities in the state of Oklahoma's workforce. Access for All focuses on the Oklahoma Works system partners as well as employers in the state. This initiative provides training, consulting, and resources to ensure that individuals with disabilities are intentionally included in efforts to achieve greater household wealth for Oklahomans.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The following barriers may impede equitable access and participation for Oklahoman's with disabilities:

1. **Economically disadvantaged:** May be unable to afford transportation, assistive technology, broadband Internet service, childcare, housing, or other support services that contribute to accessing VR services or participating in a rehabilitation program.
2. **Race, ethnicity, color, national origin, language, migrant status:** May need language interpreters for effective communication with VR or other service delivery staff.
3. **Disability:** May have a barrier to transportation that is not accessible. May need AT to access programs and services. May need information in alternate formats. May need interpreters for communication. May face physical accessibility issues at some service providers or community businesses. May face discrimination or stereotyping in the community. Lack of access to appropriate educational services including pre-employment transition services

4. Rural status:

- May face barriers due to lack of transportation
- May have limited services available in the community due to a lack of providers.

5. Age:

- May experience bias or stereotyping.
- May need AT or physical restoration services to access programs and services.

6. Homeless status or housing insecurity:

- May experience all of the barriers faced by low-income individuals.
- Lack of a stable living environment may affect ability to receive communication.
- May experience bias or stereotyping.
- Lack of access to treatment for behavioral health issues may affect ability to access services and sustain engagement.

- Lack of financial supports and income for living.
- Lack of access to information on available services

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

The following steps may be applicable to multiple barriers:

1. Providing AT as needed to access programs and services. (Section I (1))
2. Creating informational items or marketing materials in different languages and alternate formats. Section I (4)
3. Provide interpreters as needed.
4. Recruit and hire bilingual staff.
5. Increase partnerships with community organizations serving traditionally underrepresented groups.
6. Conduct professional development and training for staff and partners on relevant topics such as: (Section K)7.
7. Cultural diversity and awareness, Trauma informed care, Behavioral health impairments and Disability-specific awareness and interventions.
8. Partner with schools, development disability agencies, and other Federal, State, and local programs serving individuals with disabilities to increase access, awareness, service delivery and outcomes. (Section I)
9. Conduct employer education or training to increase disability awareness and sensitivity, decrease bias and increase employment opportunities. (Section K)
10. Provide OJTs, internships, WBLEs and other strategies that give work experience. (Section I)
11. Implementing customized employment. (Section E)
12. Educational partnerships that contribute to access. (Section I)

13. Business support staff that advocate with employers and increase opportunities.
(Section K)

14. Strategic partnerships, like with AJCs, that contribute to access.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Efforts to address barriers to equitable access and participation are ongoing. Multiple actions have been taken by the agency to address the needs of individuals with disabilities in Oklahoma over the past three years. They include, but are not limited to:

The transition unit has worked to create MOUs with partners to better serve homeless youth with disabilities.

The transition unit has worked to create MOUs with partners to better serve mental health programs for youth with disabilities.

The Business Services unit hosted a virtual AT conference and an in-person Career Expo.

DVR had several staff involved in the Oklahoma Works Conference and annual Zarrow Symposium.

Meetings have been occurring with DDS staff to better serve those with intellectual and developmental disabilities (IDD).

VR/SBVI partnered with Developmental Disability Services Division (DDSD) to conduct training for DDSD and VR/SBVI staff to prepare for the DDSD waitlist release.

OKDRS is a partner on the OK IPSE Alliance to help expand inclusive post-secondary education programs to students with IDD in Oklahoma. Three new IPSE programs have begun at universities in Oklahoma, and DRS is a partner with all three programs.

The transition team, along with partners, continue to host parent outreach meetings for Spanish-speaking parents.

A follow-up survey on Transition allowed staff to obtain more information on administrative barriers partner agency staff are facing.

Pre-ETS services continue to be expanded throughout the state. The transition team continues to encourage participation by state career techs to help expand the opportunities and training available to students.

Pre-ETS has purchased task boxes to provide Work Based Learning opportunities to youth with disabilities. These can be checked out for schools, summer programs, etc.

New transition folders were created, printed, and distributed through a partnership between OKDRS, OKSDE, ORC, and AbleTech.

The transition unit, the University of Oklahoma, Tribal VR programs, and other partners continue to work together to expand Project Search throughout Oklahoma.

Discussions have taken place between OKDRS staff and career tech staff to encourage more career techs to become supported employment vendors. This effort is ongoing.

The Transition team continues to release a monthly newsletter with information related to Transition services and meetings.

Pre-ETS at OU has initiated a Peer Mentoring Program and it is growing. Several additional universities and community colleges in the state have expressed interest in providing services to youth with disabilities.

SBVI holds multiple events to bring public awareness in the communities where the events are held and spread the word about the services that SBVI provides. These services and events also shine a light on disability populations that are underserved, potentially misunderstood, and where the individuals are often isolated, especially in rural areas of the state. These events include:

White Cane Day—SBVI holds events annually across the state on or around October 15 (National White Cane Safety Day) to bring awareness to White Cane Safety and the laws associated with white cane use by blind and visually impaired individuals.

Deaf-Blind Awareness Week is celebrated nationally the week of Helen Keller's birthday, June 27. SBVI holds an annual event to celebrate and encourage awareness and public recognition of the complex nature of deaf-blindness and to emphasize the contribution of deaf-blind individuals to our communities.

VIBE (Visually Impaired and Blindness Empowerment) is held to jump-start a client's training as well as their desire to become independent. This program has been held in OKC and Tulsa but is expanding to the more rural areas of the state to reach individuals who might not otherwise receive services due to a lack of knowledge about SBVI and/or a lack of transportation options.

The Oklahoma Library for the Blind and Physically Handicapped (OLBPH) Public Information Officer (PIO) conducts statewide outreach to all areas of the state, including rural areas, to disseminate information about the library and DRS services. The PIO also attends conferences, job fairs, resource fairs, etc. to set up informational booths for the same purpose.

SBVI manages the National Deaf-Blind Equipment Distribution Program through the Federal Communication Commission (FCC), also known as iCanConnect, which provides equipment and training needed to make telecommunications, advanced communications, and the Internet

accessible to low-income individuals who have both significant vision loss and significant hearing loss.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The Mission of the Department of Rehabilitation Services is to empower Oklahomans with disabilities. The Oklahoma Department of Rehabilitation Services (DRS) expands opportunities for employment, independent life and economic self-sufficiency by helping Oklahomans with disabilities bridge barriers to success in the workplace, school and at home. We embrace the journey in our belief in service to others so that they can improve their lives. We strive to continually improve relationships with consumers and bring awareness to how quality Vocational Rehabilitation Services impact Oklahomans with disabilities, their communities and State.

Vocational rehabilitation services are provided by the Division of Vocational Rehabilitation and the Division for Services for the Blind and Visually Impaired to help eligible individuals achieve employment outcomes that are consistent with the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of each eligible individual. VR services for individuals are meant to result in competitive employment in an integrated setting. Vocational rehabilitation services include services for individuals and services to groups of individuals and are provided statewide.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The following barriers may impede equitable access and participation for Oklahomans with the most significant disabilities:

1. **Economically disadvantaged:** May be unable to afford transportation, assistive technology, broadband Internet service, childcare, housing, or other support services that contribute to accessing VR services or participating in a rehabilitation program.
2. **Gender:** May face gender bias (unintentional or otherwise) or stereotyping. May not be presented with the full range of programs and services available to them because of bias or preconceived ideas about abilities.
3. **Race, ethnicity, color, national origin, language, migrant status:** May face prejudice, bias, stereotyping, or cultural insensitivity. Maybe unaware of VR services because of a lack of information or outreach in their native language. May need language interpreters for effective communication with VR or other service delivery staff. May need written communication generated by VR or agencies in their native language.
4. **Disability:** May have a barrier to transportation that is not accessible. May need AT to access programs and services. May need information in alternate formats. May need interpreters for communication. May face physical accessibility issues at some service providers or community businesses. May face discrimination or stereotyping in the community. Lack of access to appropriate educational services including pre-employment transition services
5. **Rural status:** May face barriers due to lack of transportation and/or may have limited services available in the community due to a lack of providers.
6. **Age:** May experience bias or stereotyping. May need AT or physical restoration services to access programs and services.
7. **Homeless status or housing insecurity:** May experience all of the barriers faced by low-income individuals. Lack of a stable living environment may affect ability to receive communication. May experience bias or stereotyping. Lack of access to treatment for behavioral health issues may affect ability to access services and sustain engagement. Lack of financial supports and income for living. Lack of access to information on available services.
8. **Pregnancy, parenting or caregiver status:** May face childcare or caregiving issues that limit ability to participate in programs or services. May experience bias or stereotyping.
9. **Sexual Orientation:** May face bias and discrimination. May have experienced trauma and resulting mental health concerns.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

1. Providing AT as needed to access programs and services. (Section I (1))
2. Creating informational items or marketing materials in different languages and alternate formats. Section I (4)
3. Increase partnerships with community organizations serving traditionally underrepresented groups.
4. Conduct professional development and training for staff and partners on relevant topics such as: (Section K)
5. Partner with schools, development disability agencies, and other Federal, State, and local programs serving individuals with disabilities to increase access, awareness, service delivery and outcomes. (Section I)
6. Conduct employer education or training to increase disability awareness and sensitivity, decrease bias and increase employment opportunities.(Section K)
7. Provide OJTs, internships, WBLEs and other strategies that give work experience. (Section I)
8. Implementing customized employment. (Section E)

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Staff will continue outreach activities to recruit new CRPs to meet the needs of individuals with all disabilities served by the DSA.

DSA will continue to collaborate with Developmental Disability Services to increase dual CRPs statewide to streamline services between the DSA and DDS. . VR/SBVI partnered with Developmental Disability Services Division (DDSD) to conduct training for DDSD and VR/SBVI staff to prepare for the DDSD waitlist release.

Additionally, DSA maintains an MOA with the DDS to improve employment outcomes for individuals with intellectual disabilities, meetings with DSA and DDS staff are ongoing in 2024 and 2025 to better serve those with intellectual and developmental disabilities (IDD).

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program—and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. ²⁴ If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

JOBS FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

Components of the Jobs for Veterans State Grants State Plan

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

A.1.a. As the State Workforce Agency all Job for Veterans State Grant staff are housed out of the American Job Centers across the state. Oklahoma American Job Centers (AJCs) follow the established priority of services intake to ensure all eligible for priority of services, including Veteran Readiness and Employment (Chapter 31), and specially targeted populations outlined in VPL 05-24 or current guidance, are immediately identified, screened and provided all appropriate services. Once identified as an eligible veteran or person, the individuals are immediately referred to the DVOP staff whose primary role is to provide individualized career services. DVOP will establish a comprehensive assessment, an IEP and establish consistent contact with the participant as part of the case management process. Once job readiness is determined, coordinated efforts begin with the LVER who has an established network of employers and a pulse on the hiring needs of the local area.

A.2.a. All employers, where possible jobs or training opportunities might occur, are contacted for employment services purposes. Attention is given to the existing demand and emerging industries and occupations to include Aerospace & Defense, Agriculture & Biosciences, Energy, Information and Financial Services, and Transportation and Distribution. Federal Contractors jobs are a strong part of our Employer Relations activity that provide the LVERs high quality employment opportunities to veterans and eligible persons. LVERs continue to promote the Hire VETS Medallion Program (HVMP) throughout the state to enhance employer's efforts in hiring veterans in Oklahoma. Attention by our DVOPs is given to coordinating activities and services with other organizations which have similar interests and responsibilities. Emphasis is given to develop relationships and agreements with veterans' organizations, the Oklahoma Department of Veterans Affairs (ODVA), the Department of Veterans Affairs (VA), and Veteran Service Organizations (VSO). LVERs work parallel with local Chambers of Commerce, Local Workforce Investment Boards, WIOA staff and other community-based organizations to promote recruitment, hiring and retention of veterans. Information on veteran training and job placement services and opportunities are conveyed to veterans and other people eligible for JVSG services to help them make decisions based on their employment needs through one-on-one counseling provided by the DVOP and/or other AJC center staff. AJC and LVER staff provide outreach and public information on veteran's employment and job training opportunities and services through representation at civic organizations and job fairs.

A.3.a. All potential employers are advised of the benefits of hiring and retaining veterans and the services available to them through the State's workforce system. The primary function of the LVER staff is to perform outreach activities to the Employer community and facilitate, through capacity-building activities, employment, training, and placement services furnished to veterans. Employers are advised that many of today's veterans leave the military with skills and experience qualifying them, sometimes with little or no additional training. Veterans make excellent employees, and we emphasize the value added to the company.

A.4.a. The Homeless Veteran Reintegration Program (HVRP) grantee voluntary enrolls clients into the state database as part of their intake process. The DVOP staff collaborates and works with the (HVRP), the Veterans Upward Bound program and other community-based service providers to enhance veteran client's employment possibilities. Strong efforts are made to link up with other service providers such as veterans.gov and other employment sites to assist with our efforts to place and retain veterans in meaningful employment.

A.5.a. Special efforts are made to provide employment services to all categories of veterans and other people eligible for services funded by JVSG, Wagner-Peyser (W-P), and the Workforce Investment Opportunity Act (WIOA). Coordinated outreach efforts are provided by the OESC Communications Director and Division to reach veterans and other eligible people through social media platforms, Veteran-centric service providers, job and resource fairs, and links to USAJOBS, EmployOklahoma, and other employment sites. Contacts with local Department of Career and Technology Education (CareerTech) centers promote training opportunities for veterans and are a vital resource.

B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

B.1.a. To receive employment services from a DVOP, the individual must meet the eligibility requirements under 38 U.S.C. 4101(4) and 4211(4) and other eligible spouses as defined in 38 U.S.C. 4101(5). The eligible veteran or eligible person must also, self-attest to meet the definition of an individual with a Significant Barrier to Employment (SBE), or a Population designated by the Secretary as eligible for services, in accordance with VPL 05-24 or most current guidance.

- I. *Qualifying Employment Barriers.* To receive DVOP services, an eligible veteran or eligible person must affirm that they are experiencing at least one of the following employment barriers:
 - a. Has a disability, which may include any of the following:
 - i. *Special disabled veteran*, defined in 38 U.S.C. § 4211(1) as a veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined to have a serious employment handicap; or person who was discharged or released from active duty because of a service-connected disability.
 - ii. *Disabled veteran*, defined in 38 U.S.C. § 4211(3) as a veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs²; or a person who was discharged or released from active duty because of a service-connected disability.
 - iii. *Other disability.* Eligible veterans and eligible persons who self-identify as having a disability, as defined by the Americans with Disabilities Act, 42 U.S.C. § 12102.
 - b. Is a Vietnam-era veteran, as defined by 38 U.S.C. § 4211(2) as an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era, as defined by 38 U.S.C. § 101(29).
 - c. Is a recently separated veteran, defined in 38 U.S.C. § 4211(6) as a veteran who was discharged or released from active duty within the last three years.
 - d. Has been referred for employment services by a representative of the Department of Veterans Affairs.
 - e. Is experiencing homelessness, as defined in Sections 103(a) and (b) of the McKinney Vento Homeless Assistance Act (42 U.S.C. § 11302(a) and (b)).

- f. Is justice-involved, as defined in WIOA Section 3(38), 29 U.S.C. § 3102(38) (definition of “offender”).
 - g. Is between the ages of 18–24 years of age at the time of enrollment.
 - h. Is educationally disadvantaged, meaning that the individual lacks a high school diploma or equivalent certificate.
 - i. Is economically disadvantaged, which means any of the following:
 - i. Meets the definition of a low-income individual in WIOA Section 3(36), 29 U.S.C. § 3102(36).
 - ii. Unemployed.
 - iii. Heads of single-parent households containing at least one dependent child.
- II. *Additional Populations.* Annual appropriations acts may authorize JVSG staff to serve certain non-veteran populations.
- a. Transitioning Service Members (TSM) who, at the time of enrollment, have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling.
 - b. Wounded, ill, or injured members of the Armed Forces who are receiving treatment in military treatment facilities or warrior transition units.
 - c. Spouses or other family caregivers of those wounded, ill, or injured service members described in subparagraph b.

Veterans and eligible persons who do not meet the above criteria are still entitled to Priority of Service (POS) under 38 U.S.C. and may receive services through other AJC programs, including Wagner-Peyser, WIOA Title I Adult, Dislocated Worker, and Youth Programs, and partner agency programs.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

C.1.a. In accordance with 38 U.S.C. §§4103A and 4104, Oklahoma's Jobs for Veterans State Grant (JVSG) staff are fully integrated within the Oklahoma Works – American Job Center (AJC) network. Each role DVOP, LVER, and consolidated DVOP/LVER is designed to deliver coordinated, individualized, and employer-focused services that connect veterans and eligible people to meaningful employment opportunities while ensuring compliance with Veterans' Priority of Service.

Disabled Veterans' Outreach Program (DVOP) Specialists are an integral part of Oklahoma's workforce system. DVOPs provide individualized career services (ICS) and case management to veterans and eligible people with Significant Barriers to Employment (SBEs) or who otherwise meet eligibility under current federal guidance. Their primary responsibilities include:

- Conducting comprehensive assessment. This is an in-depth evaluation that documents the individual's employment barriers and pertinent history, such as education, skills, and job history.
- Developing and maintaining Individual Employment Plans (IEPs) tailored to each participant's goals.
- Providing individual and group career counseling, résumé assistance, and interview preparation.

- Facilitating career planning and workforce readiness workshops focusing on communication, professional behavior, punctuality, and workplace skills.
- Coordinating referrals to supportive services, training programs, and WIOA partners when appropriate.
- Conducting follow-up activities after job placement to promote long-term employment success.

In addition, DVOPs will conduct targeted outreach with community service providers to maximize the number of participants referred to the AJC system, enhance employment outcomes for veterans and eligible people, and strengthen community awareness of the broad array of workforce and training services available through Oklahoma's workforce development system.

All DVOP activities and services are documented in the State Management Information System (Employ Oklahoma).

C.2.a. Case Management, consisting of a documented comprehensive assessment, written Individual Employment Plan (IEP), and consistent contact with the participant, is a primary tool for DVOPs in assisting disabled veterans and other eligible persons with employment needs. All DVOP staff receive specialized training from the National Veterans Training Institute (NVTI), in person and online. DVOPs provide high-quality employment services through Individualized Career Services for veterans and other eligible persons with barriers to employment. DVOPs are also integrated into the workforce development process and collaborate with AJC partner agency staff to provide veterans with a full array of services. DVOPs provide other core services such as labor market information, career guidance, resume assistance, referral to support agencies, and job referral/development as a part of the employment plan when appropriate. DVOPs assist in establishing the veteran and other eligible person with being Job Ready, during this process the LVER works parallel with DVOP to identify an employment opportunity to aid in the process of tailoring the resume. DVOPs will provide follow-up assistance after the veteran or other eligible person enters employment to increase their employment retention.

C.3.a. LVERs conduct outreach to the employer community and facilitate employment, training, and placement services under the state's employment service delivery system. States must assign LVERs duties that inform employers, employer associations, and business groups of the advantages of hiring veterans. Their primary responsibilities include:

- Planning, conducting, and participating in job and career fairs.
- Conducting employer outreach, including facility tours or interviews with current employees to familiarize themselves with job responsibilities or qualifications.
- Assisting with job development for veterans, eligible persons, and other DVOPeligible populations enrolled in workforce development programs.
- Facilitating job search workshops/groups, on behalf of/in conjunction with employers, provided that DVOP and/or other AJC staff are available to deliver any direct services needed.

- Working with established unions, apprenticeship programs, and businesses or business organizations to promote and secure employment and training for veterans.
- Informing federal contractors of the process to recruit qualified veterans; Promoting credentialing and licensing opportunities for veterans.
- Coordinating and participating with other business outreach efforts, including the efforts of WIOA business service representatives.
- Educating and training AJC staff to ensure easier access to the appropriate employment and training services for job-seeking veterans.
- Conducting community outreach and presentations on behalf of employers seeking to hire veterans;
- Promoting initiatives and programs such as the DoD Skillbridge program; and
- Promoting the HIRE Vets Medallion Program and assisting local area employees in applying for the award when appropriate.

LVERs serve as advocates for veterans within the business community, ensuring employers understand how to access qualified veteran talent through Employ Oklahoma and the statewide AJC network.

C.4.a. Consolidated positions are authorized under VPL 05-24 when justified by workload, geography, or funding. Staff in these positions perform the duties of both DVOP and LVER roles, dividing time proportionally based on local need. The SWA plans to use Consolidated DVOP/LVERs in the rural parts of the state in PY26.

Their responsibilities include:

Delivering individualized career services to veterans and eligible people with QEBs.

Conducting employer outreach and developing job opportunities for job-ready veterans.

Maintaining accurate service documentation in Employ Oklahoma; and

Ensuring coordination between case management and employer engagement efforts.

Consolidated staff operate under the same standards and performance expectations as their single-role counterparts and ensure full program compliance across all service areas.

C.5.a. Oklahoma has implemented a planned collaboration requirement between the DVOP, LVER, and Center Manager/Supervisor to ensure there is maximum focused employment oversight for each case management eligible veteran or eligible person. Depending on the number of veterans on the DVOP case management load, and the severity of the significant barriers to employment, the DVOP, LVER, and Center Manager will schedule, at least monthly, but more often if necessary, a collaboration meeting to discuss each veteran's current case management status, brainstorm employment outreach opportunities, any potential job developments and existing referrals that will maximize each of the case managed veterans opportunity to overcome existing barriers and gain employment.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR

AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

D.1.a. Oklahoma has a Service delivery system model that provides employment services through 27 AJCs. JVSG staff are integral to delivering services to veterans within the local AJCs network. They are included among the AJC partners staff, which consists of all staff employed by programs or activities operated by AJC partners listed in 29 U.S.C. 2841(b). DVOPs and CODLs will be strategically assigned throughout the state with emphasis on communities where high concentrations of veterans are located. DVOPs are also located near Oklahoma's four large military installations. LVER staff are assigned to AJCs and SWAs throughout 4 territories: Central, NE, SE, and West within the State to ensure each of Oklahoma's workforce investment areas have a presence for effective outreach to employers. LVERs communicate daily with Center Managers to promote employment opportunities for veterans' priority and preference; they maintain close communication with all partners to relate changes to policies and programs and forward up-to-date information on current and future programs. DVOPs are directly supervised by the Center Managers at their assigned local AJCs. This provides a seamless integration of the services and collaboration throughout the SWA. DVOP and LVER staff are not siloed in the AJCs and are actively engaged in operations. All staff members participate in daily staff meetings, and JVSG and Center Management staff participate in quarterly integrated training conferences to enhance service delivery to the targeted population.

D.2.a. LVER staff are assigned to AJCs and SWAs throughout 4 territories: Central, NE, SE, and West within the State, as mentioned above, to ensure each of the state's workforce areas have veterans-focused outreach to employers to develop job opportunities and encourage the hiring of veterans. LVERs conduct employer relations to solicit job orders and provide job referrals for veterans. They also call on Federal Contractors who are required by law to submit all job applications through EmployOklahoma to be entered into the website so that veterans are allowed first priority in hiring.

D.3.a. DVOPs, CODLs and LVERs will make recommendations relative to their assigned roles and responsibilities to State Workforce system partners, AJC, and SWA center managers for improvements in services to veterans. DVOPs conduct relationship-building, outreach, and recruitment activities with other service providers in the local area to enroll SBE and priority category veterans in an AJC. LVER staff also provides veteran services guidance and policy updates to staff during routine meetings throughout the local AJC office. They assist in maintaining an open flow of information on how best to assist veterans seeking employment and other career-enhancing services. In addition, the LVER also assists local office staff with job development outreach for all veterans within the area of service.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

E.1.a. To receive Jobs for Veterans State Grant (JVSG) funds, a state must design a program of performance incentive awards in accordance with 38 U.S.C. 4112 and this guidance. The

incentive award program was established to: Recognize eligible employees for excellence in providing such services or for having made demonstrable improvements in providing services to veterans per VPL 01-24 Att. 5.

Indicate the total percentage of funds designated for performance incentive awards: Oklahoma JVSG will utilize the 1% grant allocation set aside for the Incentive Award Program. The award will designate 100% for individual cash awards through a nomination period for Quarterly and Annual awards.

Objective to be achieved: Oklahoma expects the Veterans Performance Incentive Awards Program will encourage an increase in employment services to veterans and other eligible individuals, innovative approaches to serving them, expanded program integration, increases in performance outcomes, and more advocacies within the employer community. Oklahoma also expects staff will:

- Improve policies and procedures related to veterans' services,
- Improve the promotion of services to veterans and other eligible individuals through case management, innovative outreach strategies, supportive services, and job development.
- The development of new systems or procedures which will increase collaboration and improve performance outcomes.

The Planned Selection and Award Process for Annual Awards

Selection criteria for award recipients will be based on performance and activities during the federal fiscal year for which the award is given. Nominations are due no later than a date approved by the Veterans Employment Coordinator and the VP of Operations over the JVSG program, which will be established and placed in the request for nominations message. The following are eligible recipients for the performance incentive award:

- Disabled Veterans' Outreach Program (DVOP) specialists.
- Local Veterans' Employment Representative (LVER) staff.
- Consolidated DVOP/LVER Positions (CODL).
- Individuals providing employment, training, and placement services to veterans under the Workforce Innovation and Opportunity Act (WIOA), including labor exchanges funded by the Wagner-Peyser Act.

For Individual awards, they will provide specific examples of how individuals provided outstanding service to Veterans, those with SBE, and eligible people. The following data will be used:

DVOP:

1. How many of their referrals converted into active case management?
2. How many veterans did this DVOP case manage this year?
3. How many veterans were placed into employment?

4. What is their placement rate compared to the statewide average? (calculate by dividing placements/Case Managed)
5. Were their case notes timely and audit-compliant?
6. Success Stories: Did this DVOP consistently convert hard-to-place veterans into stabilized, employed individuals? (homeless, incarcerated, ex-offenders)

LVER:

1. How many employer contacts did this LVER generate this year?
2. What is the JD-to-interview conversion rate?
3. How many placements resulted directly from LVER job developments?
4. What is the JD-to-Placement conversion rate?
5. Success Stories: Did this LVER measurably expand real hiring access for veterans in their region?
6. Outreach/Community event followed by successful network relationships with an employer that includes long-term agreements with veteran job placement.

For individuals providing employment, training, and placement services to veterans under the Workforce Innovation and Opportunity Act (WIOA), including labor exchanges funded by the Wagner-Peyser Act:

1. How many customers were referred to DVOPs this year?
2. How many of those referrals resulted in confirmed services or case management?
3. How many customers were placed into employment with ES assistance?
4. Did this ES staff member serve priority populations (veterans, dislocated workers, justice-involved, etc.) at a higher rate than peers?
5. Success Stories: What measurable outcome resulted from your involvement? (Hire date, wage, full-time/part-time, and whether the veteran remained employed 30+ days if known.).
6. Above and beyond efforts to connect veterans with employers provide details of events/success stories.

E.2.a. Funds Distribution for Individual Awards:

- a. LVER 1st Place – 13% of award total
- b. LVER 2nd Place - 10% of award total
- c. DVOP 1st Place - 13% of award total
- d. DVOP 2nd Place - 10% of award total
- e. CODL 1st Place - 13% of the total award
- f. CODL 2nd Place - 10% of award total

- g. CODL 3rd Place - 8% of award total
- h. ES Staff/Other 1st Place - 13% of award total
- i. ES Staff/Other 2nd Place - 10% of award total

E.3.a. The award will designate 100% for individual cash awards through a nomination period for Annual awards with no non-cash charged to the base allocation.

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

E.3.a. The award will designate 100% for individual cash awards through a nomination period for Annual awards with no non-cash charged to the base allocation.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

The state does not anticipate any challenges in carrying out a performance incentive award program.

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

JVSG Performance Measures:

- Employment Rate 2nd Quarter After Exit: 54%
- Employment Rate 4th Quarter After Exit: 55%
- Median Earnings 2nd Quarter After Exit: \$8000

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the

Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Levels for PYs 2026–2027

Consistent with WIOA section 116 and applicable federal guidance, the State of Oklahoma will negotiate expected levels of performance for PYs 2026 and 2027 with the U.S. Department of Labor for all core programs.

Proposed performance levels will reflect current labor market conditions, recent performance outcomes, and the State’s ongoing workforce system transformation. Final negotiated levels will be submitted through the appropriate federal reporting and approval processes and will apply to the Adult, Dislocated Worker, Youth, Wagner-Peyser, Adult Education, and Vocational Rehabilitation programs.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	73.5%		73.5%	
Employment (Fourth Quarter After Exit)	73.5%		73.5%	
Median Earnings (Second Quarter After Exit)	\$7,677.00		\$7,677.00	
Credential Attainment Rate	73.5%		73.5%	
Measurable Skill Gains	69.2%		72.0%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as

“baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 20226 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	75.7%		75.7%	
Employment (Fourth Quarter After Exit)	75.0%		75.0%	
Median Earnings (Second Quarter After Exit)	\$10,000		\$10,000	
Credential Attainment Rate	82.5%		82.5%	
Measurable Skill Gains	71.0%		75.0%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	76.5%		76.5%	
Employment (Fourth Quarter After Exit)	79.0%		79.0%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$6,162		\$6,162	
Credential Attainment Rate	65.0%		56.0%	
Measurable Skill Gains	72.8%		72.8%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);

- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the

core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	62.2 %		62.2 %	
Employment (Fourth Quarter After Exit)	63.0%		63.0%	
Median Earnings (Second Quarter After Exit)	\$6,840.00		\$6,840.00	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment

Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	39.0%		40.0%	
Employment (Fourth Quarter After Exit)	41.0%		42.0%	
Median Earnings (Second Quarter After Exit)	\$5,300		\$5,350	
Credential Attainment Rate	31.0%		32.0%	
Measurable Skill Gains	44.0%		44.5%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	53.0%		53.1%	
Employment (Fourth Quarter After Exit)	51.7%		51.8%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$5,427		\$5,500	
Credential Attainment Rate	51.1%		51.2%	
Measurable Skill Gains	72.5%		72.6%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

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The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed

approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADDITIONAL INDICATORS OF PERFORMANCE

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Additional Indicators of Performance
Oklahoma has no additional indicators of performance at this time.

OTHER APPENDICES

Not applicable