WIOA Waiver Implementation Timeline

Transitioning authorized Local Board functions to the Governor's Council

Subject to DOL approval

JULY 1, 2027	9 MILESTONES	5 GATES	UP TO 18 MONTHS
Conditional target	Implementation sequence	Readiness evidence	Transition window

IMPLEMENTATION SEQUENCE

Timing remains conditional on federal approval and documented readiness.

OCT 1–31, 2026	**PUBLIC COMMENT** Completed public-comment period; retain submissions and prepare the consolidated State response.
NOV 2026	**SUBMISSION** Finalize leadership and Fiscal review; submit revised waiver and supporting documents. DOL decision date is unknown.
AFTER APPROVAL	**PHASE 1 | GOVERNANCE** Confirm approval terms, governance authority, regional structure, owners, policy inventory and work schedule.
PHASE 2	**STAFFING & CONTROLS** Validate staffing, backups, fiscal controls, cost allocation and continuing or closing obligations.
PHASE 2	**SUCCESSOR ARRANGEMENTS** Complete applicable procurements, contracts, MOUs/IFAs, service coverage checks and handoff arrangements.
PHASE 2	**OPERATIONAL TESTING** Test reporting, records access, payments, oversight and workflows; resolve material deficiencies.
PHASE 3	**FINAL READINESS** Verify handoffs, participant commitments, rural access and evidence for all five mandatory gates.
JUL 1, 2027*	**CONDITIONAL TRANSFER** GCWED authorizes only DOL-approved functions after readiness gates and federal conditions are satisfied.
AFTER TRANSFER	**STABILIZATION & CLOSEOUT** Maintain monitoring and services; finish reconciliations, records actions and award closeouts.

*** July 1, 2027 is a target, not an automatic effective date.**

Existing arrangements continue until lawful successor arrangements, required readiness evidence and federal conditions are satisfied.

WIOA Waiver
Phases & Readiness Gates

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THREE IMPLEMENTATION PHASES

01
PLANNING & GOVERNANCE

After approval

Confirm authority, owners, regional voice, policy inventory, federal conditions and milestones.

02
OPERATIONAL ALIGNMENT

After Phase 1

Complete fiscal and procurement controls, staffing, statewide policies and operational testing.

03
IMPLEMENTATION READINESS

Before transfer

Validate handoffs, service continuity, access, risk mitigation and final GCWED authorization.

FIVE MANDATORY READINESS GATES

1 PERFORMANCE & DATA QUALITY

Federal reporting, validation, corrective action and visibility by local area or region.

2 FISCAL & OPERATIONAL

Financial management, staffing, cost allocation, procurement, oversight and separation of duties.

3 STATEWIDE POLICY

Complete, publish, operationalize and validate required statewide policies.

4 STAKEHOLDER & REGIONAL

Establish functioning advisory councils; document recommendations and State responses.

5 IMPLEMENTATION & CONTINUITY

Verify handoffs, participant commitments, local access and outstanding obligations.

DECISION RULE & SERVICE CONTINUITY

Federal approval does not itself transfer Local Board functions. GCWED authorizes implementation only after documented satisfaction of all five readiness gates and applicable DOL conditions. If approval or readiness is delayed, the schedule adjusts within the permitted waiver period.

LOCAL SERVICE PROTECTIONS

Title I services continue through competitively procured providers. Existing contracts and participant commitments are not automatically terminated. Local-area allocations, American Job Center services and rural/frontier access remain protected.