

OKLAHOMA PYS 2022-2023 (MOD)

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I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

This is a unified plan

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

Oklahoma is pleased to present this Two-year modification to the Unified Strategic Four-year State Workforce Development Plan for the Workforce Innovation and Opportunity Act, administered by the Oklahoma Office of Workforce Development (OOWD), which is housed at the Oklahoma Department of Commerce. The Plan discusses the State's vision, goals, and strategies for carrying out WIOA programs administered by OOWD, the Wagner-Peyser Act (Title III) housed at the Oklahoma Employment Security Commission (OESC), the Adult Education and Literacy Program (Title II) housed at the Oklahoma Department of Career and Technology Education (ODCTE), and the Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973 (as amended by Title IV) housed at the Oklahoma Department of Rehabilitation Services (DRS).

Supported by data, the plan highlights the state's priorities for building a strong talent pipeline and statewide economic development. The plan was created based on the vision, goals, and strategies identified by Governor J. Kevin Stitt and the Governor's Council for Workforce and Economic Development (GCWED or Governor's Council), which serves as the statewide workforce development board. OOWD also convened partners from OESC, DRS, and ODCTE to collaboratively discuss priority strategies in service of our customers. Leadership from each WIOA Core Partner program selected individuals to participate on a State Plan Committee. Those individuals met to jointly develop individual program components and joint components of the plan.

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II. STRATEGIC ELEMENTS

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

1. ECONOMIC AND WORKFORCE ANALYSIS

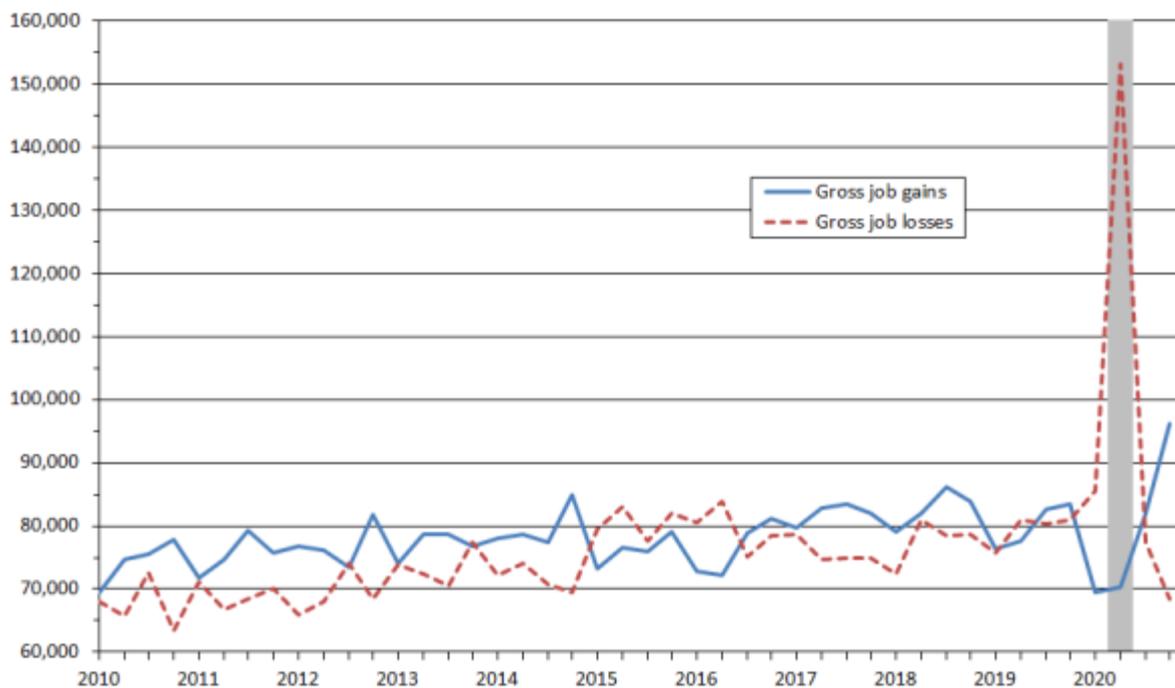
The following section outlines the economic trends in the state and local workforce development areas including real GDP, gross job gains, target sectors, critical occupations, and the education, work experience, and on-the-job training required to meet employer needs in these areas. Since March 2020, Oklahoma, along with the United States, has dealt with the recession resulting from the coronavirus (COVID-19) pandemic. The following analysis includes data available as of October 2021.

The Oklahoma Employment Security Commission (OESC) produces a monthly economic indicators report through its Economic Research & Analysis Division (<https://oklahoma.gov/oesc/labor-market.html>). In the most recent publication of the Oklahoma Economic Indicators Report (October 2021), Oklahoma's real gross domestic product

(GDP) accelerated to a 3.5 percent rate in the 2nd quarter of 2021, following a downwardly revised 0.4 percent decline in the 1st quarter, ranking Oklahoma 46th among all other states and the District of Columbia. Statewide current-dollar GDP was at a level of \$196.4 billion (in constant 2012 dollars) in the 2nd quarter, up \$1.7 billion from the 1st quarter level of \$194.7 billion.

From September 2020 to December 2020, gross job gains from opening and expanding private-sector establishments in Oklahoma totaled 96,217, an increase of 14,256 jobs from the previous quarter (Oklahoma Economic Indicators Report, October 2021). Over this period, gross job losses from closing and contracting private-sector establishments numbered 68,507, a decrease of 8,980 jobs from the previous quarter, according to the Oklahoma Employment Security Commission, Economic Research and Analysis Division, and the U.S. Bureau of Labor Statistics, (see figure below). The difference between the number of gross job gains and the number of gross job losses yielded a net employment gain of 27,710 jobs in Oklahoma’s private sector during the 4th quarter of 2020.

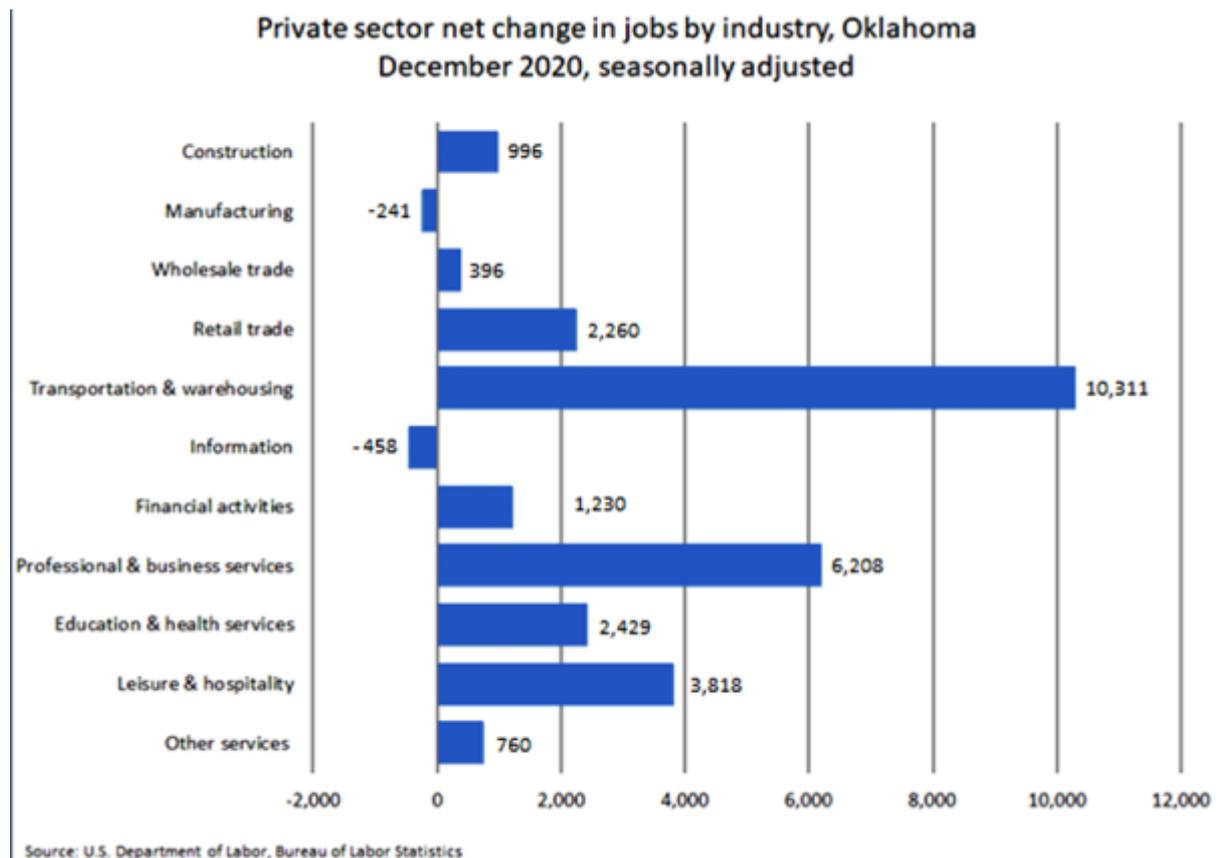
Private sector gross job gains and gross job losses in Oklahoma
March 2010 - December 2020, seasonally adjusted



Source: U.S. Bureau of Labor Statistics
Note: Shaded area represents NBER defined recession period.

The change in the number of jobs over time is the net result of increases and decreases in employment that occur at all businesses in the economy (Oklahoma Economic Indicators Report, October 2021). Business Employment Dynamics (BED) statistics track these changes in employment at private business establishments from the third month of one quarter to the third month of the next. Gross job gains are the sum of increases in employment from expansions at existing establishments and the addition of new jobs at opening establishments. Gross job losses are the result of contractions in employment at existing establishments and the loss of jobs at closing establishments. The difference between the number of gross job gains and the number of gross job losses is the net change in employment. Gross job losses in Oklahoma the 2nd quarter of 2020 (153,017) were at the highest level since BED record keeping began in 1992, eclipsing the previous high set in the 1st quarter of 2009, towards the end of the ‘Great Recession’, when 101,545 jobs were lost.

Gross job gains exceeded gross job losses in nine of Oklahoma’s 11 reported industries in the 4th quarter of 2020 (Oklahoma Economic Indicators Report, October 2021). The service-providing industries experienced a net job increase of 26,954 jobs in the 4th quarter of 2020. Within service-providing industries, the transportation & warehousing sector had the largest over-the-quarter net job increase, gaining 10,311 jobs. This was the result of 12,860 gross job gains and 2,549 gross job losses. The professional & business services sector followed with a net increase of 6,208 jobs in the 4th quarter of 2020. Additional service-providing sectors experiencing net job gains in the 4th quarter were leisure & hospitality (3,818 jobs); health & education services (2,429 jobs); retail trade (2,260 jobs); financial activities (1,230 jobs); and other services (760 jobs). The only service-providing sectors reporting net job losses in the 4th quarter of 2020 was information (-458 jobs). Oklahoma’s goods-producing industries realized a net job increase of 755 jobs in the 4th quarter of 2020. Of the reported goods-producing industries, the construction sector experienced a net increase of 2,976 jobs, while manufacturing showed a net loss of 241 jobs (see figure below).



Additional industry and jobs analysis of Oklahoma and its six workforce development areas is provided below. Using the North American Industry Classification System (NAICS) two-digit industry groups, the table below provides the number of jobs in each industry. Data was pulled from Emsi (2021.3 datarun), which includes data from the Quarterly Censuses of Employment and Wages (QCEW) along with other employment data sources. Government was the top industry by number of jobs in 2020 for Oklahoma and all six local workforce development areas.

Industry	Jobs in State of Oklahoma	Jobs in Central WDA	Jobs in Green Country WDA	Jobs in Northeast WDA	Jobs in South Central WDA	Jobs in Southern WDA	Jobs in Western WDA
Government	369,653	140,634	72,621	21,480	38,055	47,808	48,831

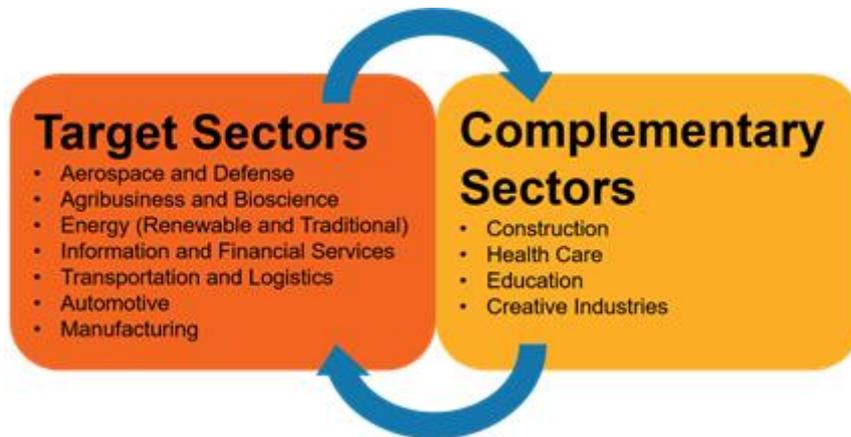
Health Care and Social Assistance	195,907	80,950	65,312	9,830	8,947	16,058	14,200
Retail Trade	177,299	66,784	52,932	10,613	11,037	16,141	18,952
Accommodation and Food Services	141,278	59,461	39,160	7,307	8,499	11,946	14,025
Manufacturing	131,522	34,109	51,234	10,133	7,027	14,629	14,111
Administrative and Support and Waste Management and Remediation Services	91,989	39,034	31,237	3,542	3,812	4,135	4,873
Construction	80,706	30,778	25,312	4,599	5,012	5,378	7,877
Professional, Scientific, and Technical Services	73,995	35,584	22,408	1,674	3,148	4,047	4,586
Other Services (except Public Administration)	73,474	29,983	22,704	4,413	4,154	4,959	6,958
Transportation and Warehousing	63,385	27,252	18,611	1,986	2,357	7,839	4,934
Finance and Insurance	59,871	26,804	18,023	2,336	3,211	3,843	4,964
Wholesale Trade	55,301	22,286	16,514	2,305	1,807	3,502	5,254
Mining, Quarrying, and Oil and Gas Extraction	31,392	10,859	5,194	3,190	1,597	3,586	6,602
Educational Services	22,596	11,677	7,429	553	574	517	1,224
Management of Companies and Enterprises	20,533	9,882	7,279	475	480	583	1,376
Real Estate and Rental and Leasing	20,508	9,220	6,580	698	990	1,099	1,686
Information	18,276	6,319	6,329	1,092	1,156	935	1,587

Arts, Entertainment, and Recreation	16,043	7,748	4,961	951	571	555	1,220
Agriculture, Forestry, Fishing and Hunting	13,002	1,625	2,557	1,330	1,313	1,563	4,592
Utilities	9,541	2,664	2,771	612	726	1,073	1,475

In order to meet the employer needs of the existing and emerging industry and occupations, Oklahoma has developed strategies to identify target and complementary sectors and critical occupations and the required education, work experience, and other skills employers need to fill these roles.

Target Sectors

Oklahoma Department of Commerce has identified key industry sectors (<https://www.okcommerce.gov/doing-business/business-relocation-expansion/industry-sectors/>) for the state of Oklahoma. The Key Industry Sectors provide a competitive advantage in a global economy. They exhibit significant potential for employment growth and provide wealth generating employment opportunities. These Target Sectors include Aerospace and Defense, Agribusiness and Bioscience, Renewable and Traditional Energy, Transportation and Logistics, Automotive, and Manufacturing. Growth in these areas lead to employer workforce needs in complementary sectors. These complementary sectors include Construction, Health Care, Education, and Creative Industries.



The following table shows the estimated number of new jobs for each of the target sectors in 2026, along with the growth rate and average earnings per job in the target sector. Employer demand for positions in the target sectors are projected to grow with the exception of the energy sector.

Target Sector	2021 Jobs	2026 Jobs	Estimated Net Job Growth (2021-2026)	Growth Rate (2021-2026)	Average Earnings Per Job
Aerospace and Defense	110,068	115,275	5,206	5%	\$74,894
Agriculture and Bioscience	73,599	76,888	3,289	4%	\$64,347
Energy (Renewable and Traditional)	84,357	77,852	-6,505	-8%	\$109,643

Target Sector	2021 Jobs	2026 Jobs	Estimated Net Job Growth (2021-2026)	Growth Rate (2021-2026)	Average Earnings Per Job
Information and Financial Services	106,118	107,835	1,716	2%	\$91,636
Manufacturing	136,079	138,409	2,330	2%	\$74,881
Transportation and Distribution (Includes Automotive)	122,680	126,732	4,052	3%	\$71,010
Source: Emsi-economicmodeling.com-2021.2					

Critical Occupations

The top 100 Critical Occupation List (<https://oklahomaworks.gov/oklahoma-workforce-data/critical-occupations/>) is longitudinal, focused on job growth in the future and acknowledging the need for extended timeframes to achieve higher levels of education. This list identifies occupations that are in high demand among employers in Oklahoma and are projected to have positive future growth.

The methodology for selecting occupations for inclusion in the Top 100 Critical Occupation List is designed to emphasize the state's desire to meet employer labor demands so that businesses and entrepreneurs can grow and prosper, and Oklahoma citizens can maintain wealth-generating occupations. Factors included in the selection process demonstrate the values of job growth, wealth generation, and education. To account for sustainable wages, jobs with median hourly earnings below \$15 were removed. Jobs with no formal education with a median wage below \$20 were also removed.

Education

The State of Oklahoma's 100 critical occupations include the typical education employers need for entry-level positions. For each occupation, the typical entry-level education required by employers is identified. Since these are based on the nation as a whole, the typical entry-level education required by employers in these areas may differ in Oklahoma. In 2019, most of these positions, approximately 62.53%, required some form of postsecondary education for employment. These ranged from some college to Doctoral degrees, shown below. Employers of most of Oklahoma's critical occupations require Bachelor's degrees, at 39.98%, to fill their roles. Positions in this area were mostly mid to higher skill appointments, requiring a higher education and skill level to meet employer needs than jobs at the high school diploma level. Here, employers that seek bachelor's or graduate degrees to fill these occupations tend to be in education, STEM, and social services. Additionally, 37.47% of these positions typically require only a High School Diploma. Employers in this area were mostly needing to fill lower skill positions than those offered at the Bachelor's and graduate degree level. These included positions in the service sector such as industrial machinery and transportation.

By 2025, employers of 60.16% of these positions will require some form of postsecondary education for employment. This is a slight decrease in employer demand for postsecondary educational attainment from 2019, by approximately 2.37%. Bachelor's degrees will remain the highest employer-demanded credential in 2025 with employers of 42.55% of these positions requiring the degree. This is a slight increase of 2.57% from 2019. Additionally, employers that require a High School Diploma will see a slight increase in demand by 2025, approximately

2.37%. Overall, employers of Critical Occupations in the State of Oklahoma primarily require some form of postsecondary education and business demand for this will continue to rise through 2025. Despite the slight growth in the employer demand for positions requiring education beyond high school between 2019 and 2025, demand for education attainment will be slow to rise. This may indicate that employers in Oklahoma might focus more on required experience and skills rather than a particular credential held by prospective applicants.

Annual Job Openings in 2019 by Required Education for Entry

Education Level	Job Openings in 2019	Percentage of 2019 Jobs
Associates	9,420	1.85%
Bachelors	203,083	39.98%
Doctoral or professional	17,951	3.53%
High school diploma or equivalent	190,315	37.47%
Masters	14,220	2.80%
Postsecondary nondegree award	65,609	12.92%
Some college, no degree	7,343	1.45%

Projected Annual Job Openings in 2025 by Required Education for Entry

Education Level	Job Openings in 2025	Percentage of 2025 Jobs
Associates	10,141	1.98%
Bachelors	217,948	42.55%
Doctoral or professional	18,852	3.68%
High school diploma or equivalent	204,061	39.84%
Masters	15,118	2.95%
Postsecondary nondegree award	38,426	7.50%
Some college, no degree	7,691	1.50%

Work Experience

Employers of the State of Oklahoma’s critical occupations require varying levels of work experience. In 2019, most of these positions, approximately 76.90%, did not require any formal work experience at all. Only 23.10% of these positions required applicants to have some form of work experience. This included less than 5 years (10.54%) or more than five years (12.56%) of work experience. Most employers of positions that included work experience requirements were primarily needing to fill management roles. These ranged from general managers to financial and marketing managers, among others. By 2025, employers of Oklahoma’s critical occupations will require nearly the same levels of work experience as they did in 2019. Employers of 76.95% of these jobs will not require any formal work experience, a slight 0.05% increase from 2019. Additionally, positions that require less than five years of work experience will drop by 0.04%.

Typical On-the-Job Training

Employers of the State of Oklahoma’s critical occupations require varying levels of on-the-job training (OJT). According to BLS, OJT refers to the amount of training time that occurs when an

employee starts a position. In 2019, employers of a little over half of these positions did not require OJT, approximately 56.07%. These included a wide range of occupations including lawyers, registered nurses and engineers, among many others. Employers of 43.93% of these positions did require some form of OJT. Specifically, this included apprenticeship, internship/residency, as well as long, moderate, and short-term OJT. 3.01% of these positions required an apprenticeship of some sort. These occupations were electricians and plumbers. Employers of 1.90% of these positions required an internship and/or residency. These positions were all in the health sector: Physicians, general practitioners, speech language pathologists, and healthcare social workers. 6.97% required long-term OJT and included more vocational and trade-based positions such as machinists, firefighters and maintenance workers, among others. 25.27% required moderate-term OJT and also included occupations that were more trade-based in nature including dispatchers and construction workers, among others. Finally, employers of 6.78% of these occupations required short-term OJT and included only loan interviewers and truck drivers. By 2025, these figures will hardly change. For example, 56.08% of these positions will require no formal OJT, an insignificant increase of just 0.01%. 43.92% of these positions will require OJT of some variety, a decrease of only 0.01%. Overall, there is a demonstrated need for OJT for employers of Oklahoma's critical occupations. Additionally, Incumbent Worker Training can be an opportunity for existing employees in critical occupation positions.

(i) Employment and Unemployment

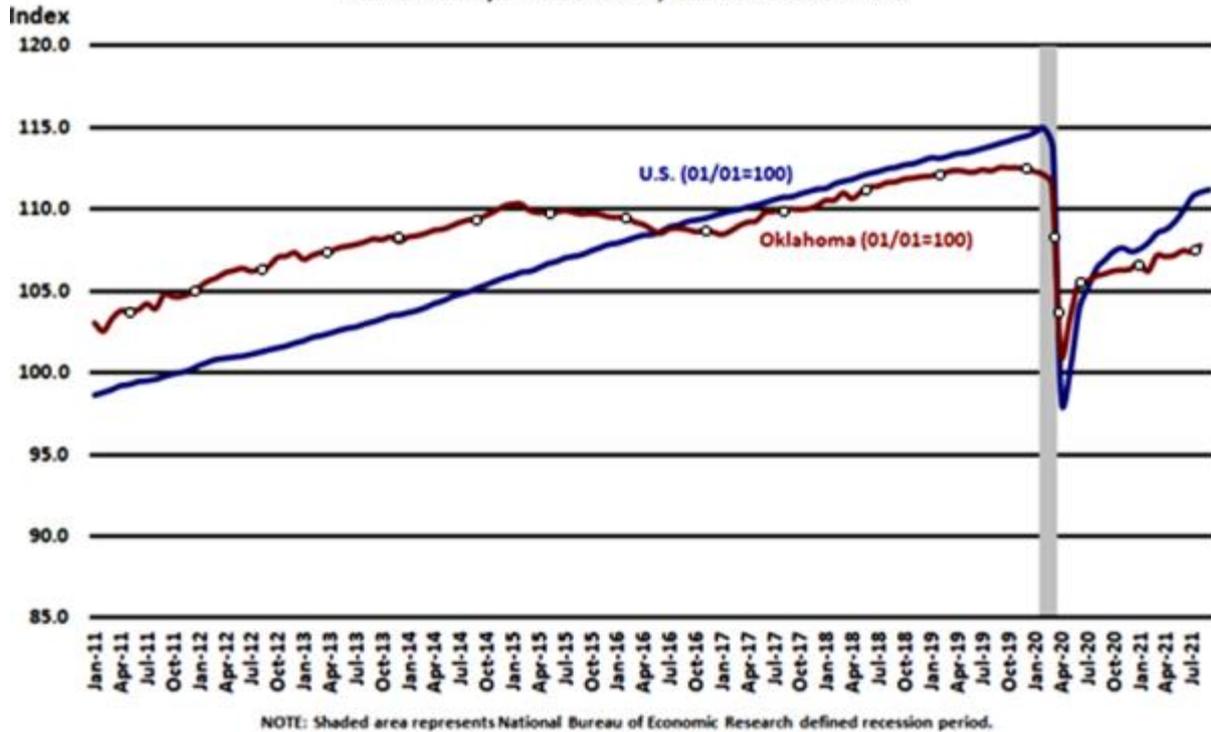
The Oklahoma Office of Workforce Development publishes Workforce Briefings for the state and each of the six local workforce development areas (<https://oklahomaworks.gov/workforce-briefings/>). The briefings examine the current and projected future status of the state, its residents, and workforce. Specifically, the briefings review the population, education, labor force, top industries by total jobs, and target and complementary sectors. Portions of this section are from the 2021 State Workforce Briefing. Additionally, data from the most recent Oklahoma Economic Indicators Report from the Oklahoma Employment Security Commission (OESC) and the American Community Survey (ACS) from the Census Bureau were used in this section.

Payroll employment is one of the most current and reliable indicators of economic conditions and recessionary trends (Oklahoma Economic Indicators Report, October 2021). Increases in nonfarm payrolls translate into earnings that workers will spend on goods and services in the economy. The greater the increases in employment, the faster the total economic growth.

U.S. and Oklahoma Nonfarm Payroll Employment (Seasonally Adjusted)

Index: January 2001=100

Source: U.S. Department of Labor, Bureau of Labor Statistics



Oklahoma’s seasonally adjusted nonfarm employment added 5,900 jobs (0.4 percent) in August, to a level of 1,636,200 while the July estimate was upwardly revised to 1,630,300. In August, nine of Oklahoma’s supersectors added jobs as education & health services (2,000 jobs) posted the largest monthly gain followed by construction (1,800 jobs). Leisure & hospitality (-1,700 jobs) reported the largest over-the-month job losses in July. Over the year, Oklahoma’s seasonally adjusted nonfarm employment added 28,500 jobs (1.8 percent).

Between June 2020 and June 2021, Oklahoma’s urban areas and surrounding counties generally saw gains in employment over all industries while rural counties further away from Oklahoma’s urban areas typically experienced losses of employment. All of the counties of Oklahoma’s largest cities gained employment during this period: Cleveland County (6.8%), Tulsa County (3.4%), Oklahoma County (3%), and Wagoner County (2.8%). These figures all exceeded the state-level employment rate of 1.8 percent described above. The greatest gains in employment were among four counties either bordering or near the border of the State of Texas: Pushmataha County (12.3%), McCurtain County (10.4%), Choctaw County (9.8%), and Marshall County (7%). The greatest losses in employment were among four counties that are not adjacent to an urban county: Love County (-11.6%), Ellis County (-5.5%), Major County (-5.3%), and Harper County (-4.8%).

12 month percent change in employment, Total, all industries Total Covered June 2020- June 2021

Area Name	No Of Establishments	Employment	One-Year Employment Gain/Loss (Percent)
Adair County	312	4513	6.2
Alfalfa County	143	1247	-3
Atoka County	307	3173	-1.2

Beaver County	168	1321	5.5
Beckham County	788	8248	-0.4
Blaine County	311	2939	4
Bryan County	1059	18750	-1.7
Caddo County	611	7196	0.5
Canadian County	3354	33436	6.1
Carter County	1719	22532	5
Cherokee County	811	16218	3.8
Choctaw County	371	4355	9.8
Cimarron County	95	785	4.2
Cleveland County	6296	86323	6.8
Coal County	118	1044	-1.2
Comanche County	2423	40105	2.2
Cotton County	105	1589	4.4
Craig County	428	4872	-2.9
Creek County	1557	18626	1.1
Custer County	1001	12140	0.9
Delaware County	840	9375	2.1
Dewey County	195	1532	-3
Ellis County	133	1101	-5.5
Garfield County	1699	23367	0
Garvin County	803	9642	4
Grady County	1199	11628	-0.2
Grant County	161	1346	-1
Greer County	106	881	-2.2
Harmon County	69	632	-2.9
Harper County	143	982	-4.8
Haskell County	250	3182	4.3
Hughes County	270	2701	-2
Jackson County	638	9355	0.5
Jefferson County	143	1027	-3.3
Johnston County	232	2585	-2.5

Kay County	1186	17169	2.3
Kingfisher County	578	6276	-3.5
Kiowa County	237	1849	1.5
Latimer County	213	2225	-1.1
Le Flore County	959	11333	-2.2
Lincoln County	683	6747	3.2
Logan County	778	7656	2
Love County	234	5541	-11.6
McClain County	1116	9726	4.1
McCurtain County	761	12241	10.4
McIntosh County	394	4150	1.4
Major County	252	2017	-5.3
Marshall County	284	4451	7
Mayes County	933	12372	-0.3
Murray County	363	5292	0.4
Muskogee County	1536	28812	2.1
Noble County	256	4533	3
Nowata County	182	1840	0
Okfuskee County	217	2308	3.8
Oklahoma County	28956	451071	3
Okmulgee County	754	9052	0
Osage County	551	6206	-0.2
Ottawa County	730	12214	3.1
Pawnee County	301	3260	1.6
Payne County	2075	31278	0.4
Pittsburg County	1031	14664	2
Pontotoc County	1149	18538	3.1
Pottawatomie County	1406	21756	4.1
Pushmataha County	268	2553	12.3
Roger Mills County	107	861	3.7
Rogers County	1974	25469	-0.6
Seminole County	508	6635	-0.7

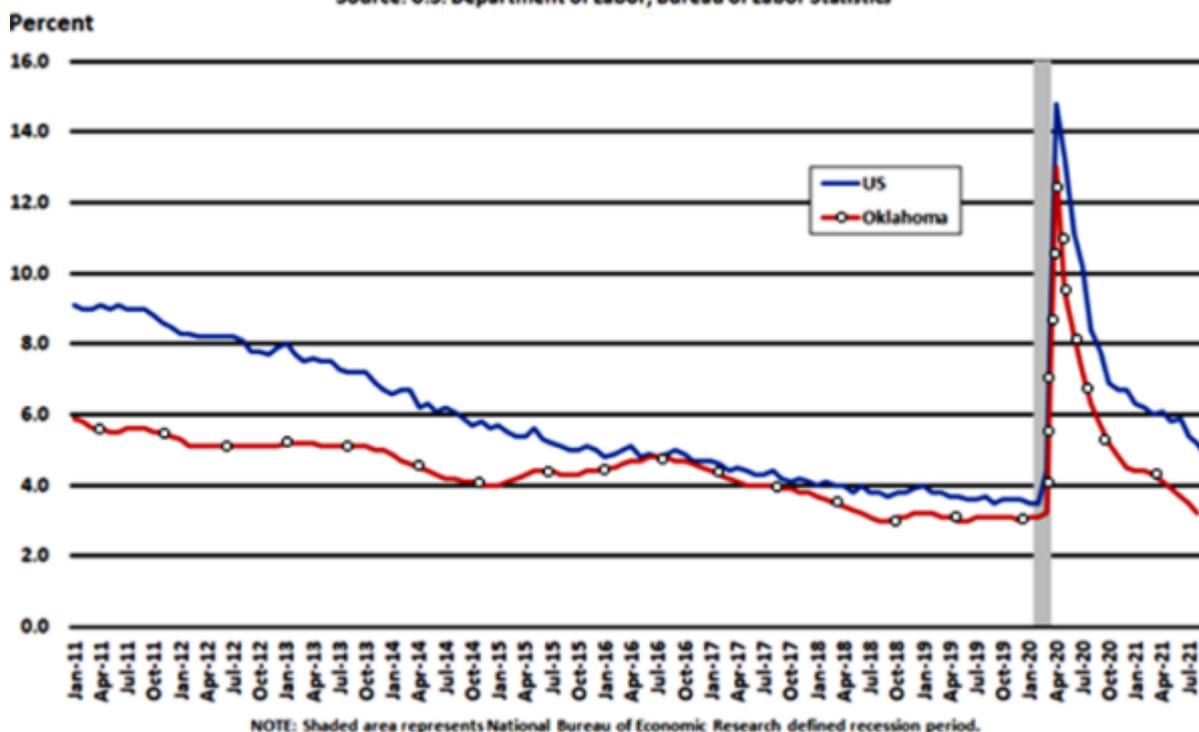
Sequoyah County	713	9343	-0.6
Stephens County	1130	14144	6.6
Texas County	576	9308	-1.6
Tillman County	178	1472	-4.2
Tulsa County	23107	349590	3.4
Wagoner County	805	9606	2.8
Washington County	1304	18754	4
Washita County	269	1786	-2.7
Woods County	310	3285	5.4
Woodward County	813	8109	-0.6
Source: U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages			

In the most recent publication of the Oklahoma Economic Indicators Report (October 2021; <https://oklahoma.gov/oesc/labor-market.html>), Oklahoma’s seasonally adjusted unemployment rate fell 0.3 percentage point to 3.2 percent in August—the lowest jobless rate since March 2020. Over the year, Oklahoma’s seasonally adjusted unemployment rate was 3.1 percentage points lower than August 2020.

U.S. and Oklahoma Unemployment Rate (Seasonally Adjusted)

January 2011 to September 2021

Source: U.S. Department of Labor, Bureau of Labor Statistics



NOTE: Shaded area represents National Bureau of Economic Research defined recession period.

In August 2021, Oklahoma’s unemployment rate was 2.8% (Emsi 2021.4 Datarun). The six local workforce development area unemployment rates ranged from 2.4% to 3.1%. The Central area’s unemployment rate was 2.7%, Green Country area was 2.9%, Northeast area was 2.6%, South Central area was 2.9%, Southern area was 3.1%, and Western area was 2.4%.

Oklahoma’s labor force participation rate was 60.3% in August 2021 (Emsi 2021.4 Datarun). Out of the six local workforce development areas, the Central area had the highest labor force participation rate at 62.2%, and the Southern area had the lowest rate at 55.4%. The Western area had the second highest participation rate at 62.0%, and the Northeast area had the second lowest at 58.0%. The Green Country area and the South Central area were in the middle at 60.1% and 58.7%, respectively.

Employment and Unemployment: Populations

This section reviews the employment and unemployment of various populations in Oklahoma. When available, labor force participation rates are included. Labor force participation rates include both employed and unemployed individuals. Unemployed individuals are seeking employment, so they are considered a part of the labor force. Typically, the labor force participation rate includes the civilian noninstitutionalized population age 16 and older. Some labor force participation rates are calculated on the civilian noninstitutionalized population between the ages of 20 and 64 years.

Youth and Older Individuals

The WIOA youth employment program serves eligible youth, ages 14-24. The unemployment rate for younger youth, ages 16-19 years, is 13.4% in Oklahoma. The unemployment for older youth, ages 20-24 years, is almost half that rate at 7.1%. Labor force participation rate almost doubles from younger youth to older youth (see table below).

Age	Labor Force Participation Rate	Unemployment rate
16 to 19 years	39.5%	13.4%
20 to 24 years	74.7%	7.1%
25 to 29 years	80.3%	5.3%
30 to 34 years	79.8%	4.5%
35 to 44 years	79.6%	3.5%
45 to 54 years	77.3%	3.3%
55 to 59 years	68.4%	2.9%
60 to 64 years	56.1%	1.7%
65 to 74 years	26.8%	2.6%
75 years and over	8.0%	1.5%
2019 ACS 1 Year Estimates, Table ID S2301, 16 years and older		

Older individuals are age 55 and older, as defined in WIOA sec. 3(38). In Oklahoma, older individuals have the lowest unemployment rates compared to individuals 54 years and younger.

However, labor force participation rate decreases significantly for older individuals. Retirement is the top reason older individuals are not in the labor force.

Low Income

The labor force participation rate for individuals between 20 to 64 years is 74.9% in Oklahoma (2019 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 population rate is much lower for individuals below the poverty level at 45.7%. Additionally, the 2019 unemployment rate for individuals below the poverty level was 16.0%, and the population at or above the poverty level was significantly lower at 2.9%. Together, the unemployment rate for 20-64 year old's was 4.0% in 2019.

Individuals with Disabilities

The civilian noninstitutionalized population (18-64 years old) in Oklahoma is approximately 2.3 million. Approximately 324,602 out of the 2.3 million are individuals with disabilities (2019 ACS 1-Year Estimates, Table ID B18120). The labor force includes both employed and unemployed individuals, and 43.4% of individuals with disabilities are in the labor force. 39.6% were employed, and 3.8% are unemployed. Out of the employed individuals, 42,088 were individuals with a hearing difficulty, 34,701 were individuals with a vision difficulty, 37,614 were individuals with a cognitive difficulty, 41,794 were individuals with an ambulatory difficulty, 9,097 were individuals with a self-care difficulty, and 20,295 were individuals with an independent living difficulty. Out of the unemployed individuals, 2,108 were individuals with a hearing difficulty, 2,538 were individuals with a vision difficulty, 6,957 were individuals with a cognitive difficulty, 3,745 were individuals with an ambulatory difficulty, 795 were individuals with a self-care difficulty, 3,673 were individuals with an independent living difficulty.

Race and Ethnicity

The labor force participation rates and unemployment rates for race and ethnicity in 2019 for Oklahoma are provided in the table below (2019 ACS 1 Year Estimates, Table ID S2301, 16 years and older). 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 70.9%. Conversely, American Indian and Alaska Native alone had the lowest labor force participation rate at 59.8%. Black or African American alone had the highest unemployment rate at 7.9% while Asian alone had the lowest unemployment rate at 2.1% in Oklahoma. Hispanic ethnicity with any race had a labor force participation rate of 70.1% and an unemployment rate of 4.5%.

Race and Hispanic or Latino Origin	2019 OK Labor Force Participation Rate	2019 OK Unemployment Rate
White alone	60.5%	3.8%
Black or African American alone	60.2%	7.9%
American Indian and Alaska Native alone	59.8%	6.3%
Asian alone	65.1%	2.1%
Native Hawaiian and Other Pacific Islander alone	Not Available	Not Available
Some other race alone	70.9%	3.3%
Two or more races	64.0%	6.3%

Race and Hispanic or Latino Origin	2019 OK Labor Force Participation Rate	2019 OK Unemployment Rate
Hispanic or Latino origin (of any race)	70.1%	4.5%
White alone, not Hispanic or Latino	59.6%	3.7%
2019 ACS 1 Year Estimates, Table ID S2301, 16 years and older		

Educational Attainment

Educational attainment employment data from the Census includes the population aged 25-64 years (2019 ACS 1 Year Estimates, Table ID S2301). The 2019 Labor force participation rates increased based on level of educational attainment: less than high school graduate was 56.8%, high school graduate (includes equivalency) was 69.6%, some college or associate’s degree was 76.8%, and bachelor’s degree or higher was 86.6%. Similarly, the unemployment rates decreased based on level of educational attainment: less than high school graduate was 6.2%, high school graduate (includes equivalency) was 4.7%, some college or associate’s degree was 3.8%, and bachelor’s degree or higher was 1.8%.

Veterans

In 2019, there were approximately 141,629 veterans in Oklahoma that were a part of the civilian population 18 to 64 years (2019 ACS 5-year estimates, Table ID S2101). The veteran labor force participation rate for the veteran population 18 to 64 years was 74.5% and the unemployment rate was 4.1%.

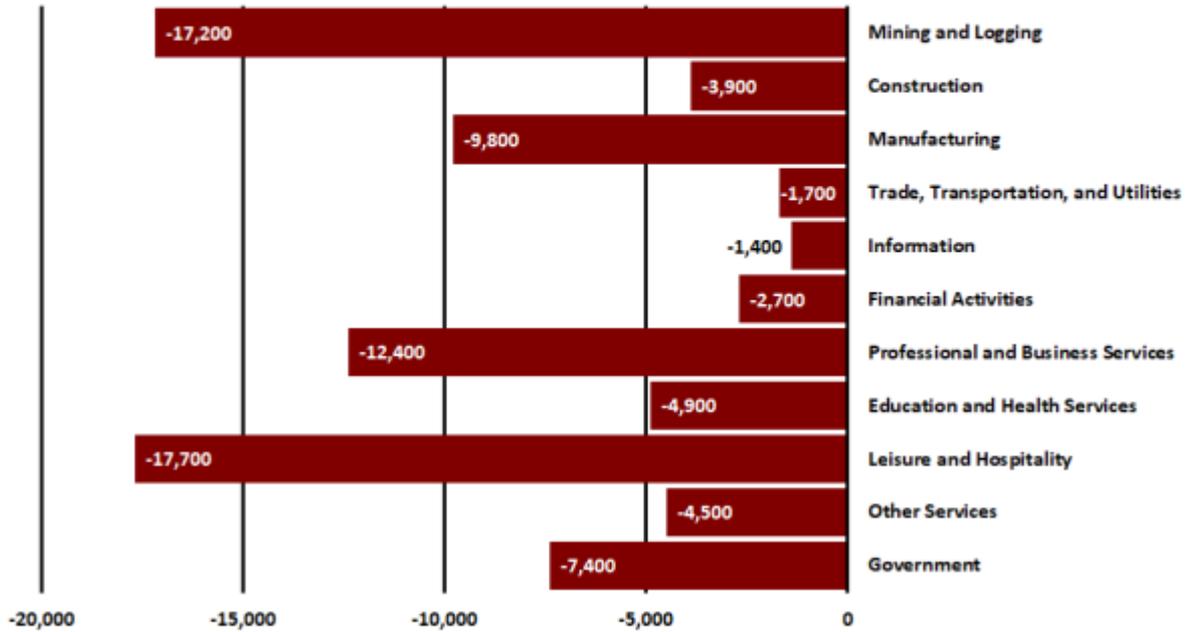
(ii) Labor Market Trends

Employment growth by industry identifies the types of jobs being created in the state (OESC’s Oklahoma Economic Indicators Report, October 2021). Conversely, industries with a declining employment trend indicate those which are becoming less important in the state’s economy. There may also be industries which behave more cyclically, growing during expansion and decreasing in times of economic slowdown or contraction. These changes are crucial in that they help to recognize the types of jobs being lost by individuals. Anticipating what will happen in recovery helps identify whether those jobs will return or what types of new jobs will be created. Consequently, key information for planning re-employment, retraining, and other workforce and economic development programs is contained within these data. For this analysis, CES non-seasonally adjusted annual averages were used to compare year-over-year employment changes (see figure below).

Oklahoma Employment Change by Industry, 2019-2020

Annual Averages (Not Seasonally Adjusted)

Source: Current Employment Statistics (CES), U.S. Department of Labor, Bureau of Labor Statistics

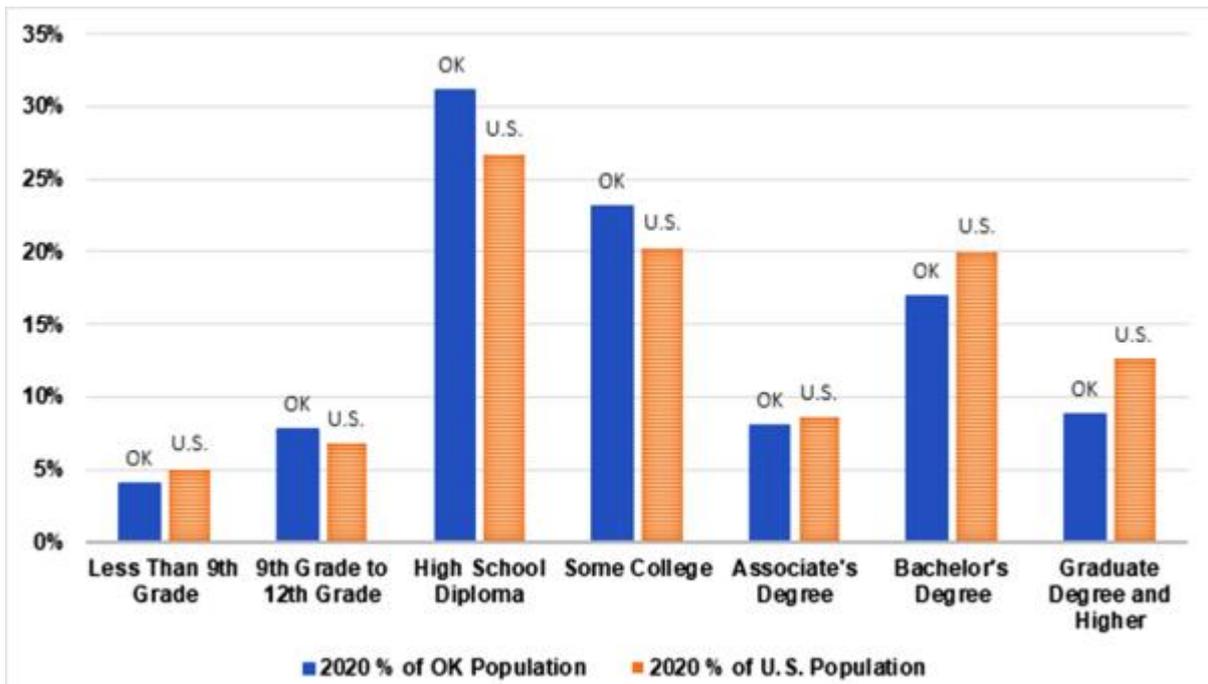


Oklahoma's annual average nonfarm employment plunged in 2020, as efforts to control the spread of the coronavirus pandemic shuttered businesses. Total nonfarm employment shed a non-seasonally adjusted 83,700 jobs (-4.9 percent) in 2020. For comparison, in 2019, 15,900 jobs were gained for a 0.9 percent increase.

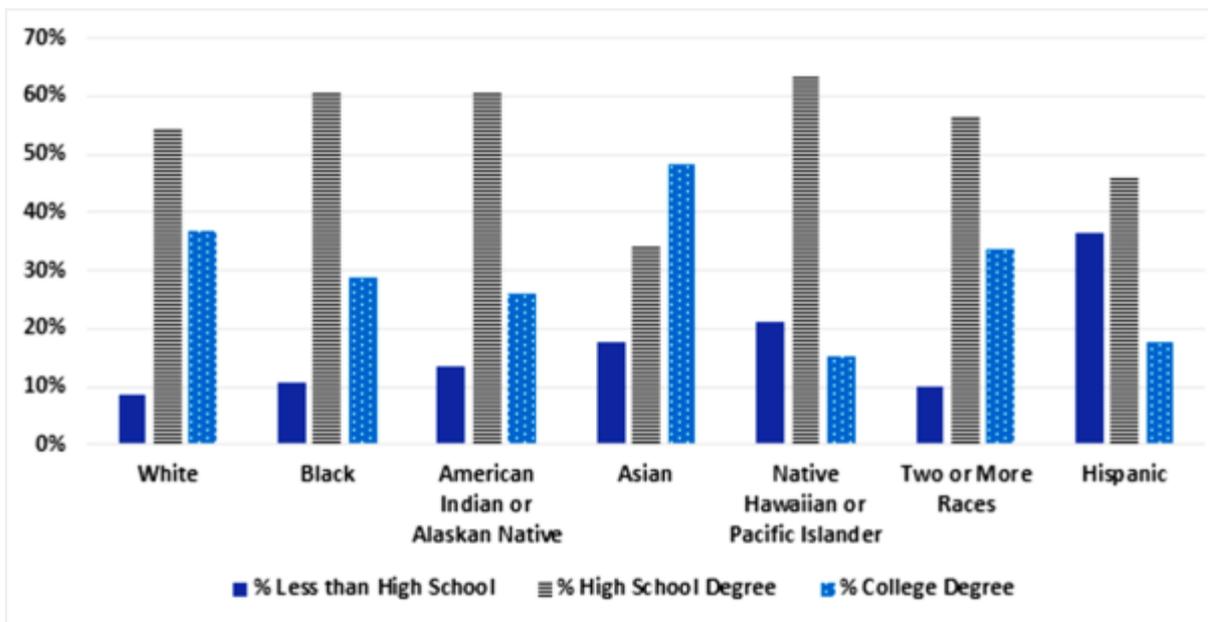
In 2020, all 11 of Oklahoma's supersectors recorded job losses. Leisure and hospitality saw the largest losses dropping 17,700 jobs (-10.2 percent) as accommodation and food services accounted for the bulk of the job losses (-15,200 jobs). Mining and logging shed a non-seasonally adjusted 17,200 jobs (-36.0 percent) as support activities for mining dropped 13,600 jobs over the year. Professional and business services employment fell by 12,400 jobs (6.3 percent) as administrative and support and waste management and remediation services lost 9,100 jobs. Manufacturing shed 9,800 jobs (-6.9 percent) with durable goods manufacturing (-9,200 jobs) accounting for almost all the job losses. Education and health services employment fell 4,900 jobs (-2.0 percent) with most of the losses in healthcare and social assistance (-4,100 jobs). Other declining sectors were other services (-4,500 jobs); construction (-3,900 jobs); financial activities (-2,700 jobs); trade, transportation, and utilities (-1,700 jobs); and information (-1,400 jobs). Government employment declined by 7,400 jobs (-2.1 percent).

(iii) Education and Skill Levels of the Workforce

The figure below compares the State of Oklahoma Education Attainment Level with the United States Education Attainment Level. In Oklahoma, High School Diploma had the highest share of the population at 31% (OOWD OK State Workforce Briefing, Emsi 2021.1 Datarun). The second highest share of the population was Some College at 23%. The third highest share of the population is Bachelor's Degree at 17%. Those with less than 9th grade educational attainment represented the smallest group at 5% of the OK population. In the United States, High School Diploma made up the highest share of the population at 27%. The next highest groups were Some College and Bachelor's Degree, both at 20%. Graduate degree holders represent 12% of the national population.



The figure below shows Oklahoma’s Education Attainment Level by race/ethnicity (OOWD OK State Workforce Briefing, Emsi 2021.1 Datarun). Across almost all racial and ethnic groups, High School Degree represented the largest percentage of the respective population groups. Hispanic ethnicity with any race had the highest population percentage at the Less Than High School level at 36%. Native Hawaiian or Pacific Islander had the highest population percentage at the High School Degree level at 64%. Asian Americans had the highest population percentage at the College Degree level at 48%.



(iv) Skill Gaps

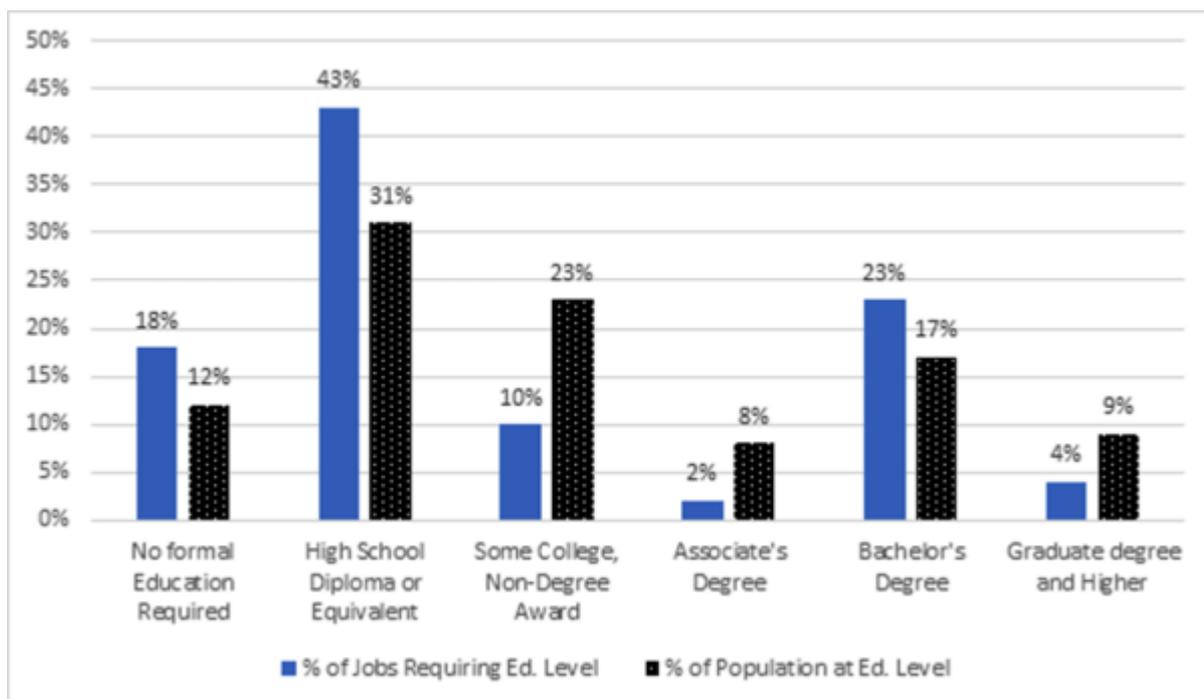
Currently, there is no standardized method for measuring workforce skills gaps by the Bureau of Labor Statistics or the U.S. Census Bureau. However, there are several strategies used by state

and local entities to identify skills gaps, such as anecdotal job seeker and employer feedback and different governmental dataset comparisons.

One strategy used to identify potential skills gaps is through an educational mismatch analysis. An educational attainment mismatch analysis compares the percentage of jobs by education levels to the percentage of the population by education levels. This analysis compares two separate government datasets. The first dataset is from the Bureau of Labor Statistics (BLS) via Emsi. For each occupation, BLS identifies the typical entry-level education based on the national average. Important to note is that the typical entry-level education for Oklahoma may differ from the national average. The second dataset is obtained from the American Community Survey by the U.S. Census Bureau. The data includes individuals 25 years and older and their educational attainment levels. This number includes people in the labor force and people not in the labor force (e.g., retirees). Additional notes to take into consideration are listed after the educational mismatch analysis.

Data for the educational mismatch analysis was obtained from Emsi’s underemployment data (2021.1 Datarun). Eighteen percent of the total jobs in Oklahoma do not require formal education. Jobs that typically require a high school diploma or equivalent totaled 43% of the total jobs. Together, these two categories account for 61% of Oklahoma’s total jobs. In comparison, 43% of the population have less than a high school diploma, have a high school diploma, or have a high school diploma equivalent. There is potentially around 18% of jobs filled by people with some college, non-degree award, or Associate’s degree, suggesting they are underemployed.

The figure below shows a higher percentage of the population with some college, non-degree award, or Associate’s degree compared to the percentages of jobs that require that level of education. There are two possible implications. First, this analysis suggests the need for more skilled jobs for our current population. Second, this analysis shows the potential benefit of increasing the number of people with Bachelor’s degree for higher skilled occupations. Currently, 23% of the jobs in Oklahoma require a Bachelor’s degree while only 17% of the population earned a Bachelor’s degree.



There are several considerations to acknowledge for this analysis. The analysis does not account for individuals’ actual educational attainment and their current employment. For

example, an individual could have a higher education credential but opts to work in a position that does not require any formal education. Another consideration to be made is that the shortfall at the bachelor's degree level will be significantly compounded by a misalignment of degree specialty. The existence of a sufficient number of individuals possessing a bachelor's degree fails to meet the needs of employers if those degrees do not provide the appropriate training necessary to fulfill job requirements. It is also important to note that there is a surplus of Master's degree or higher that fill positions only requiring a Bachelor's degree.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

(A) The State's Workforce Development Activities

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.

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

The state continues to focus efforts on credential attainment as a top priority in order to address the education and skill needs of Oklahoma's employers and workforce. These efforts were coordinated under the Governor's broader workforce development initiative, Oklahoma Works, as well as through the implementation of the Workforce Innovation and Opportunity Act. During the previous WIOA State Plan years, Oklahoma spent time building stronger partnerships and coalitions, strengthening strategies, and building a strong state infrastructure on which to seek continuous improvement. Under the new Governor's administration, Oklahoma hopes to renew support for a state educational attainment goal and refocus efforts to achieve targeted improvements in the number of Oklahomans with postsecondary certificates and credentials of value.

Oklahoma identified Five Industry Clusters (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution) in an effort to align workforce development with state economic development priorities. Oklahoma also identified the 100 Critical Occupations (growth and demand occupations) within these ecosystems which allowed all Oklahoma Works efforts to be aligned to the most critical education and training needs. Since Oklahoma is continuing to move toward regionalism, the Department of Commerce also identified Industry Clusters at the regional/local levels to aid in strategic coordination efforts for Oklahoma's seven local workforce development areas.

The initiative's full array of workforce partners must align their efforts and take active roles in ensuring resources are used in ways that maximize, strengthen, and support the education to workforce pipeline for all Oklahomans.

(B) The Strengths and Weaknesses of Workforce Development Activities

Oklahoma Works System Strengths

An updated SWOT analysis was completed by state workforce partners in late 2019.

Oklahoma's strengths include: strong interest from the Governor's administration, development of a state level workforce committee and plan, stronger private sector business member leadership on the Governor's Council, a strong postsecondary education system, and the creation of Centers of Workforce Excellence to strengthen the collaboration at the local level with alignment to local labor market needs.

1. In his first year as Governor, J. Kevin Stitt has taken a strong interest in workforce development as a way to boost economic development in the state. Under his leadership, the Cabinet Secretary for Commerce and Workforce Development convened a state level workforce committee that has developed workforce strategies primarily focused on the coordination of education partners and activities.
2. Also under Governor Stitt's leadership, more private sector business members have been added to the Governor's Council. These members were selected by the Governor and Cabinet Secretary with the expectation of active engagement and oversight of the state's workforce system.
3. Oklahoma boasts a robust and geographically diverse postsecondary education system with our Career and Technology Education System, and our higher education institutions, which includes our community colleges and four-year educational institutions. In particular, many local Career and Technology Education institutions have strong local ties to communities and are extremely responsive to local business' needs. As a part of the Governor's workforce plan, the state is developing Centers of Workforce Excellence that will be a designation for which postsecondary institutions, businesses, and other groups can apply indicating they meet the criteria for excellence in workforce development training.
4. Oklahoma exhibits a strength in system-building and infrastructure development. Over the past several years, Oklahoma has developed internal processes, procedures and investments for creating a strong infrastructure. These have yielded a strong foundation on which to build future programs. The past two years, Core Partners have united on a customer-centered vision with a strong focus on businesses and job seekers. Advancements being made consistently focus on this vision. Also, processes and procedures across agencies with regard to data sharing for performance, access for targeted populations, accountability across partners for components of the workforce system, and coordination have been developed, and are continuing to be developed. Such a framework has established a strong foundation for future developments over the next two years of the State Plan.
5. Finally, Oklahoma works with industry leaders to promote a state-wide initiative, to help businesses target their specific workforce needs. Sector Partnerships is an industry led practice to define an industry workforce gap. Partners such as Economic Development Offices, Chambers of Commerce, K-12, Workforce Development, Universities, Technology Centers, and the Community work together to respond to industry needs.

Oklahoma Works System Weaknesses

Oklahoma's Workforce Development Activities also have weaknesses that hinder us in realizing our State's vision for economic prosperity for all of our citizens, including: lack of workforce funding outside of WIOA, lack of communication regarding the Governor's workforce development committee and plan, efficient implementation of policies at the local level, and challenges of creating a longitudinal data system, information systems, and common intake processes and procedures and technology.

1. Oklahoma does not currently invest state dollars into the workforce development system which limits the activities that can be implemented through the workforce system's current capacity.
2. The Governor's workforce committee has had limited involvement from Title I and the State Workforce Board. This has created a lack of communication between the Governor's plan and the strategies of the Governor's Council for Workforce and Economic Development; although recent steps to align activities has occurred. Also, Oklahoma runs the risk of limited capacity to deliver on the ambitious strategies set forth. Due to the state's revamped efforts in and leadership for workforce development activities, there are numerous workforce development initiatives, new and revived, across the state that are requiring engagement from partner staff and the business communities. Thus, partner staff are engaged in numerous workforce related efforts, running the risk of duplication of efforts and burn-out due to a lack of capacity to sustain the efforts with the current number of staff available at each agency to devote to the efforts. Similarly, the business community may be exhausted in a short amount of time due to the numerous requests for engagement from a variety of partners and initiatives.
3. Although a major goal under Oklahoma Works is for a fully functional state longitudinal data system to better track the workforce development successes of the state and provide better data to inform policy and resource distribution, the State does not yet have a fully functional system. Further resources and continued commitment of Partners to implement this system is required in order for it to be successful.
4. The State's Education and Training Provider List (ETPL), Online Case Management System, and Labor Exchange System is not as functional nor fully dynamic as necessary to ensure a seamless system. The State must select a new vendor to ensure all new WIOA reporting requirements are met, the ETPL is fully functional to prevent barriers to identifying and securing education and training for participants, and the labor exchange system is accurate and practical for both job seekers and employers.
5. Oklahoma lacks a common intake or common registration system for citizens to better access programs for which they are eligible. All core partners have their own data systems and there is limited data sharing, which results in participant duplication, and tracking shared performance is difficult. Common intake is needed in order to get participants' the services they need, quicker, and more seamlessly, and get them education, training, and/or employment as efficiently as possible.
6. Finally, although partnerships are one of Oklahoma's biggest strengths, the interconnectedness of WIOA tests the breadth and depth of those partnerships on a daily basis. For example, despite efforts of state agency staff to meet and participate in convenings across state agencies at the state level, and with local area staff and leadership, communication across the state level and vertically to--and from-- the local level continues to be a challenge. Messaging of state level advancements and contributions to the system in the form of policies, processes, and infrastructure as required in the implementation of a new federal law, fail to provide tangible benefits to front-line staff providing services in the local area. Better communication and messaging between state agencies and between the state and local areas is necessary to appreciate each other's advancements and progress and ensure each are responsive to the others' immediate and long-term needs.

Many of the weaknesses listed above require long-term vision and sustainable resources to improve. Though the state has implemented a case management system for OESC and OOWD, challenges still exist as federal performance requirements continue to change. Similarly, vendor foci continue to be on adapting to constant federal performance changes requiring constant

remapping of the system, and advancements to the ETPL part of the system have yet to be made. We anticipate those advancements to be made in 2022.

Oklahoma Works System Opportunities:

- Data integration through reporting portal.
- More cross program policy development and local implementation to enrich collaboration and efficiencies.
- Strengthening cross-sector partnerships by utilizing each entities strength instead of building stand alone processes.
- Strengthening work-based learning alignment with local and virtual connectivity specific to meeting industry needs.
- Develop better communication and unity between OOWD, Local Areas, and Workforce Partners.

Oklahoma Works System Threats

- Difficulty getting business and industry actively engaged.
- Misalignment of data elements and systems.
- Siloed programs with limited communication between partners.

By fully understanding our SWOT analysis, we can begin to make decisions that reinforce our strengths, guard against our weaknesses, capitalize on our opportunities, and mitigate our threats. We saw increasing collaboration and efficiencies to innovate our processes as we served a larger volume of jobseekers through our American Job Center's. Pandemic impact and unemployment numbers have also increased employer interest in work-based learning, internships, apprenticeships, and sector partnership strategies. When carrying out our analysis, we will continue to be realistic, prioritize and prune our ideas to execute the most impactful actions and solutions.

(C) State Workforce Development Capacity

Oklahoma has demonstrated the engagement in and capacity to deliver on the State's workforce development goals by leveraging state agency workforce partner agencies and staff, new leadership to move the State forward, and cooperation among core partners to better coordinate and deliver services. The state has enhanced, aligned, and expanded capacity to address the education and skill needs of the workforce under WIOA.

As mentioned in the Strengths and Weaknesses response, Oklahoma runs the risk of limited capacity, not because of a lack of commitment by Partner staff, but because of the increased urgency and significance of workforce development activities and initiatives in the state.

Within Oklahoma, the Governor's Council for Workforce and Economic Development (GCWED), the WIOA State Board, is composed of business leaders appointed to the Council who represent Oklahoma's diverse geography, who are from rural and urban areas, and who represent our state's major industry economic drivers. The Council has been tasked with using data to inform policy, track progress and measure success toward goals, and governs, manages, and accounts for the way the state issues Department of Labor WIOA monies. The Governor's Cabinet and the GCWED have identified outcomes measures and targets to track progress over time. This dashboard facilitates the use of data to inform policy, track progress, and measure success consistently statewide.

Recognizing that these are members of the business community and volunteers to the Council, these members meet quarterly to best make use of their time and travel from all regions of the state.

Similarly, GCWED underwent a structural revision in December 2019, making the Governor's workforce committee an ad hoc committee of GCWED to encourage better unification of the two efforts. The GCWED also plans to create an ad hoc committee focused on developing better aligned technology and data systems across required one-stop partner programs with the goal of improving service delivery to individuals.

The System Oversight Subcommittee, the working arm of the Workforce System Oversight Committee of the Governor's Council for Workforce and Economic Development, is tasked with developing the system-wide framework and policy documents that will comply with WIOA legislation and Federal regulations, and are tasked with compliance review of the system (Oklahoma's 35 Workforce Centers located around the state). Staff from the following programs/agencies are represented on this committee: Career and Technology Education (Perkins and Adult Basic Education) through the Oklahoma Department of Career and Technology Education, Community Services Block Grant and Community Services Block Grant through the Oklahoma Department of Commerce, Senior Community Service Employment program and Temporary Assistance for Needy Families (TANF) through the Oklahoma Department of Human Services, Trade Adjustment Assistance programs and Unemployment Compensation programs through the Oklahoma Employment Security Commission, in addition to business, the Regents for Higher Education, and the Department of Rehabilitation Services, among others. The SOS includes and seeks input on policy and guidance from the Workforce Development Boards and staff as necessary. Staff, who are part of the System Oversight Subcommittee, represent some of the same partners as who attend the monthly workforce system partner meetings but are different staff.

In 2019, Oklahoma's Governor moved Workforce activities from the Education Cabinet Secretary back to the Secretary of Commerce and Workforce Development. By shifting workforce to the Commerce Secretary's portfolio, a renewed emphasis was placed on aligning workforce with economic development. The new structure and new leadership will bring a renewed commitment to workforce development.

Additionally, core partners are committed to better deliver and coordinate resources and services to maximize capacity among staff to better deliver services to jobseekers across the state. The core partners, as well as many required partners, along with the local Workforce Development Boards, will continue to develop a streamlined customer experience through referrals from and to core, non-core, and program partners to coordinate workforce activities and increase the capacity of each partner by allowing specialized services to function optimally and assist in the elimination of the duplication of services. For example, Local Elected Official Consortium Agreements identify collective responsibilities of the LEOs with regard to services provided, funding costs, methods for referring individuals among services, procedures to ensure customers with barriers to employment have access to services, and ensuring the system is meeting the needs of business.

Despite other potential threats to success, including the complexity and isolation of the state's data systems, the culture shift required for systems thinking as opposed to programs thinking under WIOA, and the culture shift required by today's global economy for skills--and the workforce-- to be flexible, adaptable, and stackable, opportunities exist to utilize the capacity in place, or to enhance capacity, for the sake of our talent pipeline. Optimizing capacity to focus on opportunities, system-building and cross-training to support systems thinking and customer-centered, or human-centered design of the workforce development system, will allow the system to adapt to changing resources in the form of funds and/or human capital.

B. STATE STRATEGIC VISION AND GOALS

(1) Vision

The State's strategic vision: Align resources, education, training and job opportunities to build Oklahoma's workforce.

Oklahoma Works works toward this vision by providing education and training for citizens to obtain quality employment through the scope of the federal Workforce Innovation and Opportunity Act (WIOA). The State Workforce Board also strives to coordinate strategic priorities and plans across education, training, and industry to provide employment opportunities for workers and ready availability of highly skilled talent for business and industry.

Within Oklahoma, the Governor's Council for Workforce and Economic Development (GCWED), the WIOA State Board, is composed of a majority of business leaders appointed to the Council who represent Oklahoma's diverse geography, who are from rural and urban areas, and who represent our state's major industry clusters. The Council has been tasked with using data to inform policy, track progress and measure success toward implementing WIOA, and governs, manages, and accounts for the way the state issues Department of Labor WIOA monies. The Governor's Cabinet and the GCWED have developed metrics for workforce development in Oklahoma. These metrics, including benchmarks and targets, will be made into a data dashboard that will be used to inform policy, track progress, and measure success consistently statewide.

Under the leadership of the Governor and the GCWED, Oklahoma Works has established the foundational pieces that align all initiative and WIOA efforts at the state and local levels. These include: State and Regional Industry Clusters: Through a comprehensive quantitative analysis, Oklahoma identified five State Industry Clusters that help drive wealth generation in the state (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution). Additionally, Oklahoma identified Regional Clusters that will help drive wealth generation in each region and align efforts to economic development priorities.

100 Critical Occupations: These occupations represent the most pressing needs in each of Oklahoma's State Industry Clusters necessary for the state's continued growth and economic prosperity. Updated annually, this list of jobs represents demand and growth occupations in a variety of industries, requiring varying levels of education and training, and spanning all levels of hourly earnings.

The Apprenticeship and Expansion Grant (ASE): Established as a statewide initiative to increase overall apprenticeship programs by 30%. Under ASE, the goal is to add 800 apprentices by 2022 and to increase youth apprenticeships through the Youth Apprenticeship Readiness Program (YARG) to 200 by the year 2024. The goal of this initiative is to ensure more Oklahomans have access to Registered Apprenticeships and quality work-based learning opportunities like on-the job training, work experience, job shadowing, and internship.

Excel Adult High School Program: As a direct response of the GCWED's Strategic Plan- Oklahoma has partnered with Gale Excel Adult High School to offer an online high school education made available through Oklahoma public libraries. The statewide initiative is to decrease the number of Oklahomans 18-44 years old without a HS equivalency from 179,000 to 85,500 by the year 2022.

(2) Goals

The Governor's Council convened a strategic planning process in April 2019, which included input from the Core Partners (Oklahoma Department of Rehabilitation Services, the Oklahoma Employment Security Commission, Oklahoma Department of Career and Technology Education, and Office of Workforce Development), business and industry members, Local Workforce

Development Board members and elected officials, and other state agency partners who are a part of the state's workforce development system (education, commerce, health, veterans, human services). The resulting strategic plan was adopted in September 2019 and serves as the overarching workforce development strategy for WIOA.

Included in the plan are four objectives and multiple strategies, including:

Objective/Goal 1: Expand Oklahoma's Workforce to Satisfy Industry and Economic Development Goals

An expanded workforce will provide a larger pool of potential workers, increase the financial and economic opportunities of workers, and encourage greater business investment, economic development, and job creation. Strategies include:

1. Engage and upskill Oklahoma's current and potential workers
2. Retain Oklahoma's workers
3. Increase the state's Labor Force Participation Rate

Objective/Goal 2: Upskill Oklahoma's Workforce

A well-trained workforce will reduce the incidence and effects of unemployment, increase the financial and economic opportunities of workers, and encourage greater business investment and job creation. Strategies include:

1. Strengthen public education's focus on career readiness outcomes
2. Expand work-based learning opportunities including Registered Apprenticeships
3. Decrease the percent of Oklahomans without a High School Equivalency credential
4. Increase the percent of Oklahomans with a post-secondary credential or degree

Objective/Goal 3: Offer Workforce Solutions to Oklahoma's Businesses

Businesses that have access to a responsive, effective and solutions-focused public workforce system will be better positioned to expand the availability of quality jobs and capital investments. Strategies include:

1. Increase understanding of workforce services among businesses through focused educational and marketing strategies
2. Include businesses in program design and service delivery
3. Develop and provide more responsive recruiting tools

Objective/Goal 4: Build Oklahoma's Workforce System Capacity

A public workforce system able to respond to changing business needs and deliver innovative solutions will support the expansion of business investments and job creation:

1. Drive innovation in program development and service delivery
2. Diversity funding in support of workforce development
3. Expand data assets, alignment and use
4. Establish a unified State information baseline for data integrity

Jobseeker goals include a focus on special populations, including youth and adults:

Goals for Youth:

1. A greater focus and clearer strategies for out-of-school youth with regard to credential attainment, work experience, and work-based learning;
2. An increased awareness of jobs that are currently available and lead to economic success, as demonstrated by labor market information.
3. An increased awareness of and access to other options/paths, in addition to college, such as Registered Apprenticeships;
4. And, a fully deployed Individual Career and Academic Plan (ICAP) integrated with all students within the secondary school system as a preventative measure.

Goals for Individuals with Barriers to Employment:

1. Clearer strategies for ex-offenders, including the exploration of a pay for performance strategy, as ex-offenders represent a large population of Oklahoma's workforce;
2. Connecting more WIOA participants to Registered Apprenticeship opportunities;
3. Increased on-the-job training opportunities (e.g., registered apprenticeships, internships, etc.) to ensure the integration of relevance with education and training, as well as enculturation into appropriate professional and soft skills;
4. Greater assistance for those who experience a job loss and are supporting a family (e.g., retraining);
5. An increased focus on lifelong learning through development of a state-level strategy to ensure individuals are both successful in the current job market, as well as the future economy as skills are increasingly changing as technology develops; and
6. Supporting and guiding a shift from survival mode to a vision for the future (adult and youth; consider mentors) for those hard-to-serve and opportunity populations.

(3) Performance Goals

Performance measurements are negotiated annually with the US Departments of Labor and Education. Oklahoma will develop proposed targets for the applicable performance measurements for PY 22 and PY 23. This state plan will be updated as performance targets are negotiated in each program year based on the negotiation process with the federal departments.

(4) Assessment

The state's assessment of the overall effectiveness of the workforce development system consists of two strategies: WIOA monitoring & oversight, and data focused analytics.

Assessment completed through WIOA monitoring & oversight allows the state to assess core performance measures, other WIOA requirements, and federal grant management requirements. Annual monitoring provides the state and local boards with outcomes related to programmatic performance, grant administration, board functionality, one-stop center operations, and accessibility. Desk reviews and continued oversight allow the state and local boards to evaluate aspects of the state's system more in depth. Assessment through WIOA monitoring & oversight highlights best practices, identifies deficiencies, and provides the state and local boards an opportunity to collaboratively respond to both. Assessment of the overall effectiveness of the workforce development system is also conducted through the processes followed certifying American Job Centers and Local Workforce Development Boards, and the review of the Regional and Local area strategic plans.

Oklahoma is renewing its focus on assessment completed through data focused analysis. The state legislature has expanded state agencies rights to share data and MOUs have been evaluated, revised, and renewed. Data focused analysis allows the state to identify trends,

patterns, and obstacles the workforce development system faces. Trends and patterns, both positive and negative, provide opportunities for the state to provide targeted technical assistance and/or highlight success stories.

WIOA monitoring & oversight combined with data focused analysis creates an environment for open communication, collaboration, and continuous improvement.

C. STATE STRATEGY

Implementation of State Strategies

Oklahoma's Career Pathways Initiative

Oklahoma continues to have an active statewide Career Pathways initiative with the goal of having a comprehensive system in place that leads students and out-of-school youth, dislocated workers, and incumbent workers through a full range of career exploration/counseling and education and training opportunities that correspond to employer needs, thus assuring a pipeline of appropriately skilled and credentialed workers for Oklahoma's companies.

Under the leadership of the Governor's Council for Workforce and Economic Development, the state has aligned policies and definitions to match those as outlined in WIOA and correspond to the state's in-demand industries and occupations. Additionally, the Governor's Council plays a key role in establishing the state vision for workforce and economic development integration. In support of career pathways, the Governor's Council has a Career Pathways Committee that is focusing on the workforce needs of Oklahoma employers, ensuring education providers can meet those needs, and increasing the skills of Oklahoma workers in order to close the skills gap. Solutions to these challenges are in sector strategies, career pathways, attainment of credentials/degrees, and increasing the number of Oklahomans with a High School Equivalency certificate.

To accomplish WIOA strategies, Oklahoma Works collaborates with public and private partners to build and strengthen career pathways to meet the needs of state and regional employers. To increase career exposure and exploration, expand work experience along career pathways, and promote education and training that lead to high demand occupations and industries, Oklahoma is focused on several strategies:

1. Expansion of Oklahoma Career Exposure Week:

Career Exposure Week began in 2017 as a way to connect local students with area businesses to give future talent the opportunity to explore the possibilities in Oklahoma that await them. This year over 60 school sites participated in this event and were registered on the oklahomaworks.gov website that allowed local businesses and employers to showcase critical careers in demand industries, to inspire and recruit new talent, and gave all levels of the talent pipeline a front row seat to experience the wide array of careers available within our State. An array of virtual presentations, open discussions, and private breakout rooms targeted students in K-12 and beyond. Oklahoma Career Exposure Week was created to:

- Introduce people to careers in businesses and industries in Oklahoma's Driver and Complementary ecosystems and Critical Occupations;
- Empower Oklahoma businesses and industries in the state's ecosystems and regions to engage with educators, students, parents, and others about career opportunities;
- Change misconceptions of Oklahoma's demand and critical occupations and the businesses and industries in Oklahoma's driver and complementary ecosystems;
- Draw attention to the roles businesses and industries play in communities across the state; and

- Underscore the economic and social significance of demand and critical occupations and businesses and industries in Oklahoma’s ecosystems.
- Oklahoma will work with partners to expand Career Exposure Week in the coming years to continue preparing youth and individuals with barriers to employment for the workforce.

2. Support the expansion of Oklahoma Education and Industry Partnership (OEIP):

OEIP offers professional development opportunities for Oklahoma fifth- through 12th-grade teachers each summer. The program allows Oklahoma educators to tour local businesses, hear from professionals in various industries, and attend education workshops to help incorporate newly acquired knowledge into curriculum. This allows more students exposure to demand industries and occupations by equipping educators with the knowledge needed to promote career pathways and the education and training opportunities available to students interested in high growth and demand occupations.

3. Increasing awareness of Career Ladders aligned to Critical Occupations

In 2019, Oklahoma Works released Career Ladders aligned to each of the state’s Critical Occupations (high growth, high demand) that also highlight transferrable skills between industries and occupations. Over the next four years, Oklahoma would like to increase awareness of these pathways and expand the reach of this information as a way to promote demand career pathways in Oklahoma.

4. Support Individual Career and Academic Plans (ICAP)

The Individual Career and Academic Plan (ICAP) was recently developed for the state’s PK- 12 system by the Oklahoma State Department of Education (OSDE) with input from students, families, educators and other partners. The ICAP equips students with the awareness, knowledge and skills to create their own individualized, meaningful exploration of college and career opportunities. In order to reflect students’ changing passions, aptitudes, interests and growth, the ICAP is a flexible, evolving document. The ICAP incorporates labor market data into occupational exploration materials to allow students to make informed decisions about education and training for future career goals.

5. Expansion of Work-Based Learning

Oklahoma Works has prioritized diversifying and expanding work-based learning opportunities as a vital component of strengthening career pathways, increasing statewide educational and training attainment, and closing the skills gap. To do this, Oklahoma Works partner agencies are collaborating to implement the policies and infrastructure necessary to support work-based learning strategies such as Registered Apprenticeships and job shadowing.

The Oklahoma Office of Workforce Development (OOWD) received an Apprenticeship State Expansion (ASE) Grant from the U.S. Department of Labor in June of 2019 to expand and diversify apprenticeship opportunities in Oklahoma. As a part of that grant, Oklahoma is working to:

- Expand the capacity of the OOWD and its partners to develop and register new apprenticeship programs.
- Develop apprenticeship outreach and communications plans to increase public awareness and conduct engagement activities with industry partners.
- Ensure more WIOA participants have access to Registered Apprenticeship opportunities.

In June of 2020, OOWD received \$450,000 for a Tier One grant from the U.S. Department of Labor's Building State Capacity to Expand Apprenticeship through Innovation (SAE 2020) grant. Under the Tier One status no participants are required and instead, the funds are allocated towards the state's apprenticeship outreach and expansion efforts as follows:

- Develop and execute promotional outreach through a targeted ad campaign.
- Provide employer incentives for the development or expansion of registered apprenticeship programs.
- Provide Registered Apprenticeship mentor stipends.
- Develop educator externships and industry tours in partnership with OSDE.

OOWD received a \$1.499 million Youth Apprenticeship Readiness Grant (YARG) from the U.S. Department of Labor in June of 2020 to expand and develop apprenticeship and pre-apprenticeship opportunities for Oklahoma youth 16-24. Through this grant, OOWD is working to:

- Leverage and expand the state agency partnerships established under the ASE grant along with newly created industry partners to develop a youth apprenticeship referral process and facilitate the coordination of changes to the state's case management system, OKJobMatch.
- Creating and implement a branding and communication plan targeting youth and parents.
- Develop and strengthen relationships with industry and education providers to leverage intermediary networks for consortium model apprenticeship programs.
- Provide employer/program sponsor funds for reimbursement of structured on-the-job learning/training and related instruction in an effort to expand the number of RAPS and apprentices in Oklahoma.
- Provide supportive services to participants to increase the rates of successful completion

A statewide goal was established by the Governor's Council for Workforce and Economic Development, to increase the number of Registered Apprentices by 800, from 1,649 to 2,449, by midyear 2022 based on OOWD's ASE grant award. However, due to the impacts of the COVID-19 pandemic, OOWD will be requesting a no cost extension in order to meet these grant deliverables. As a Tier I grant recipient of the SAE 2020 award, OOWD was not required to increase apprenticeship participation. The main goal of the Youth Apprenticeship Readiness Grant is to expand registered apprenticeship opportunities for youth, 16-24. Based on this, OOWD set an additional goal of creating 200 apprenticeship opportunities for youth, 16-24, by midyear 2024.

The main strategy of these grants is to focus on creating and expanding RA opportunities within targeted industries, including: Finance, Public Service/Government, Retail, Child Care/Early Childhood Education, Food Service and Hospitality, Public Utilities, Alternative Energy, Aerospace, Information Technology, Health Care, manufacturing, and building and construction.

Approaches 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. OOWD 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.

OOWD staff have and continue to work with local workforce boards for the recruitment of employer apprentice sponsors. Additionally, OOWD and local boards have established a process to refer employer apprenticeship sponsors to local areas for potential partnership as well as processes for the local areas to refer to OOWD staff for program development. OOWD staff have created a training on Developing Registered Apprenticeship Programs and invited local areas to participate in those trainings with the hope that local areas will be adding capacity for the development of registered apprenticeship programs with employers directly as part of their work in business services. OOWD staff regularly provide technical assistance to local areas on questions around apprenticeship and request technical assistance from local areas surrounding the potential for program development in their areas. Local areas are encouraged to participate in communication efforts surrounding apprenticeship recruitment and trainings.

The State is committed to fully integrating RA programs as an employment and training solution for one-stop centers. Local areas will have maximum flexibility in serving participants and supporting their placement into RA programs. There are several ways in which training services may be used in conjunction with these RA programs, including developing an Individual Training Account (ITA) for a participant to receive RA training, utilizing an On-The-Job Training (OJT) contract with an RA program for providing both classroom and on-the-job instruction; a combination of an ITA to cover the classroom instruction along with an OJT contract to cover on-the-job portions of the RA; and utilizing incumbent worker training for upskilling apprentices who already have an established working/training relationship with the RA program.

Career Pathways and Adults and Dislocated Workers

The Oklahoma Works' strategic plan recognizes that career counseling and training services are critical to the employment success of many adults and dislocated workers, including unemployed and underemployed individuals. Oklahoma continues to develop strategies to support the use of career pathways for the purpose of providing individuals, including low-skilled adults, youth, and individuals with barriers to employment (including individuals with disabilities), with workforce development activities, education, and supportive services to enter or retain employment.

Also in alignment with the goals of Oklahoma Works, local boards continue to utilize Title I Youth, Adult and Dislocated Worker funds in partnership with other entities that provide workforce services, adult and basic education, and rehabilitation services. Together these partner entities expand the access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. This facilitates the development of career pathways and co-enrollment into core programs, and improves access to activities leading to recognized postsecondary credentials, including industry-recognized certificates and certificates that are portable and stackable.

Oklahoma's Sector Partnerships Initiative

The Oklahoma Office of Workforce Development (OOWD) supports the development and growth of sector partnerships in the local Workforce Development Areas by providing funding opportunities for local areas, regional planning areas, and intermediary partners to establish, strengthen, and expand sector partnerships and identify partnerships for career pathways development. Goals for this work, include:

- Prioritize support and resources for demand industries and career paths.
- Provide technical assistance to partners working to develop and implement sector partnerships and strategies for increasing credential attainment.

- Align regional strategies to statewide goals and initiatives, including strategies for developing and strengthening career pathways and expanding and diversifying opportunities for Registered Apprenticeship.
- Promote credentials of value, growth and demand occupations, critical occupations in Oklahoma's Industry Clusters, and industry-driven solutions for closing the state's skills gaps.
- Develop and implement local and regional strategies to assist Oklahomans in entering critical occupations and closing skills gaps. Targeted populations include WIOA-defined special populations, including ex-offenders, veterans, homeless adults, long-term unemployed, individuals with disabilities and at-risk youth.
- Blend and leverage resources and funding to support the long-term sustainability of sector partnerships and strategies for increasing credential attainment.

The Career Pathways Committee of the Governor's Council for Workforce and Economic Development serves in a leadership role for this work, helping to identify and coordinate training, technical assistance, and other resources necessary to support sector partnerships at the local and regional levels. Additionally, the Committee created a subcommittee for employer engagement and industry partnerships which is responsible for identifying state-level opportunities for industry and sector partnerships. The results of sector partnership work are intended to inform and guide the work of the Career Pathways Committee.

Business Services

The Oklahoma Office of Workforce Development (OOWD), which administers WIOA title I, is revamping business services. In addition to providing additional resources to local areas to hire fulltime board staff dedicated to business services activities, required core services are being established to ensure consistency in services regardless of where a business is located in the state.

Data informed business services strategies include:

- Sector Strategies
- Incumbent Worker Training
- Competency-Based Hiring Strategies
- Registered Apprenticeship
- Layoff Aversion Strategies, and
- Real-Time LMI Data Reports

Strategies for Alignment of Core Programs

In Oklahoma, each of the four core programs is administered by a separate state agency. In addition to the core programs, required and optional partner programs are administered and carried out by a variety of organizations across the state. Despite the roadblocks the State's structure presents, Oklahoma believes that coordinating strategic priorities is key to the success of the workforce system as a whole. Under the Governor's leadership and the appointed members of the Governor's Council for Workforce and Economic Development (GCWED), Oklahoma's State Workforce Board, the State strives to align education, training, economic development, social services, and business & industry.

Strategies for workforce system service delivery alignment are framed under the objectives set forth in the strategic plan developed by the GCWED. The strategic plan prioritizes goals identified for Oklahoma’s workforce and economy by the Governor. The goals are then used to analyze ways in which the state’s workforce system supports the goals or needs to make changes to priorities in order to support the goals. Strategies vary depending on the partners identified for different priorities.

These strategies include regularly convening partner meetings at the state level through Core Partner meetings and the work of the System Oversight Subcommittee under the guidance of the Workforce System Oversight Committee of the Governor’s Council for Workforce and Economic Development (GCWED). The System Oversight Subcommittee (SOS) is comprised in membership of state level partner leadership for the purposes of system evaluation, improvement, and policy development. The subcommittee works through a task force model to include the input of subject matter experts and local area perspectives. Partners are also convened regularly through local One-Stop Operator partner meetings, focus groups, task forces, etc. Coordination across agencies and programs aims to prevent “silos and any duplication of services. As duplicative efforts are discovered through continued partnership and communication, agencies and programs identify opportunities to align.

Through the annual Oklahoma Works Partner’s Conference, workforce partner organizations at the state and local levels convene for professional development. Attendees are encouraged to select sessions and breakouts based on their work as well as attend sessions geared toward partner organizations encouraging a continuous learning model that crosses programs/partners. The annual Oklahoma Works Alumni Celebration is another event produced through the collaboration and coordination with all workforce partners in recognition of participation of the workforce system and business leaders from all workforce areas in the state of Oklahoma. The Alumni Celebration embodies successful system partnership in action, as a requirement for nomination is that a job seeker has been assisted by more than one system partner to achieve recognition. Business leaders are also awarded on behalf of the Governor for each of the workforce areas.

III. OPERATIONAL PLANNING ELEMENTS

A. STATE STRATEGY IMPLEMENTATION

1. STATE BOARD FUNCTIONS

The Governor’s Council for Workforce and Economic Development (GCWED, Governor’s Council) is playing a key role as the vehicle to establish the state vision for workforce and economic development integration. Integration of workforce and economic development objectives will result in a competitive advantage for Oklahoma by achieving wealth-creation for business, individuals, and communities throughout Oklahoma. Five State Industry Clusters in major areas of employment throughout the state have been identified as driving wealth in Oklahoma:

1. Aerospace and Defense
2. Agriculture and Biosciences
3. Energy
4. Information and Financial Services
5. Transportation and Distribution

The Governor’s Council’s focus is understanding the workforce needs of Oklahoma employers and ensuring education providers can meet those needs, and increasing the skills of Oklahoma workers in order to close the skills gap. Various solutions to these challenges are in sector

strategies, attainment of credentials/degrees, reducing the high school dropout rate, and career pathways.

The Governor's Council includes private and public sector individuals that work together to support the governor's economic and workforce development vision (Oklahoma Works) across the state. The Council meets quarterly, however, interaction between its members occurs on a regular basis. Initiatives that involve long-standing partnerships between private companies and public agencies are ongoing.

Private and public sector representatives also serve on Governor's Council committees charged with developing and recommending initiatives, pilots, best practices, etc., to enhance and implement Oklahoma's workforce and economic development strategy. The committees meet monthly or as needed to accomplish their goals and objectives.

Operational Structure, Decision Making Processes, and WIOA Implementation

Executive Committee

The Executive Committee is comprised of business members of the Council, including at minimum: the Chair, Vice-Chair, and the Co-Chair (private sector representative) from each of the Council's committees, excluding those who are non-members of the Council. The Executive Committee shall act in place of the Governor's Council only when necessary and with subsequent full board review, action, and ratification. It shall convey to the Governor recommendations posed by the Council, approve the direction of the Strategic Plan, develop the areas for tasks required for committees as warranted, appoint committee composition (Council members and at-large community members) and co-chairs, respond to the needs of the Council and its members, conduct an annual review of the Executive Director, and make staff capacity recommendations.

Workforce System Oversight Committee

The Workforce System Oversight Committee (WSOC) makes decisions on program governance, policy and capacity building for the Local Workforce Development Boards and partnerships. The Committee serves in an oversight function and ensures compliance with WIOA. The WSOC has the following objectives:

- Certify Workforce Development Boards in compliance with the Workforce Innovation and Opportunity Act (WIOA).
- Design, align and integrate Oklahoma's workforce/talent development and delivery system.
- Identify and conduct service delivery efficiency pilot projects.
- Research and identify operational and organizational strategies that will help make workforce boards stronger and service delivery better.
- Develop joint system guidance to make the workforce system more effective and efficient.
- Facilitate more effective and efficient system partnership through the System Oversight Subcommittee.
- Facilitate guidance and technical assistance to support regional and local strategic planning efforts to align with the state plan.

Youth Program Committee

The Youth Program Committee provides recommendations on policy and performance for the development and implementation of WIOA youth funded programs statewide. The Committee creates an Oklahoma workforce strategy for youth that aligns with youth initiatives and provides common solutions that coordinate with the state's economic goal of building wealth creation for all Oklahomans. The Committee has the following objectives:

- Oklahomans are aware and supportive of the state's emerging workforce and the effect of current trends and issues.
- A youth system is developed through a collaborative effort of networking that is inclusive of all state and local youth organizations.
- The progress and impact of the youth system is benchmarked, measured, and rewarded and best practices reported.

Health Care Workforce Committee

The Health Care Workforce Committee informs, coordinates and facilitates statewide efforts to ensure that a well-trained, adequately distributed, and flexible healthcare workforce is available to meet the needs of an efficient and effective healthcare system in Oklahoma. The Committee has the following objectives:

- Statewide health workforce efforts are being coordinated through a single, centralized entity.
- Labor demand and program supply for 20 critical healthcare occupations are identified and quantified through the development of a longitudinal, multi-sourced data set that is available for public use.
- Strategies are in place to reduce identified supply gaps for 20 critical health occupations.
- At least five recommended policies and programs that support and retain an optimized health workforce have been implemented.

Career Pathways Committee

The Career Pathways Committee makes recommendations, informs, coordinates and facilitates statewide efforts to improve Oklahomans' exposure to high-demand career and entrepreneurship opportunities, along with the education and training required for entry into and advancement within a chosen career. The Committee develops industry sector strategies in state and regional ecosystems to ensure that the education and training system is delivering the skills needed by employers. The Committee has the following objectives:

- Create a plan for Career Pathways efforts to be based on industry sectors within Oklahoma's state and regional ecosystems.
- Create and use Career Pathways approaches to increase the proportion of low-skill learners who ultimately earn a degree.
- Increase high school graduation rates - decrease high school dropout rates.
- Increase the percentage of Oklahoma workers with a postsecondary credential.
- Make Career Pathways part of the Center certification process.
- Develop or research pilots, models and best practices.

Governor's Workforce Advisory Ad Hoc Committee

Governor J. Kevin Stitt created a statewide committee focused on developing regional strategies to develop workforce through strengthened partnerships between education and economic development. This committee has become an ad hoc committee of the Governor's Council to ensure alignment with state workforce development goals and strategies. The Advisory Committee has the following objectives:

- Economic Growth
- Education Effectiveness
- Government Efficiency

Functions and Processes

State Plan

The Governor's Council assists the governor in the development, implementation, and modification of the State Plan by assigning staff from various entities represented on the Governor's Council to collaborate on the initiatives included and the writing of the plan. The Governor's Council develops linkages through its members. This regular contact among partners allows for constant collaboration on issues.

Regional and Local Plans

The Governor's Council's Workforce System and Oversight Committee reviews regional and local plans submitted from each of Oklahoma's workforce development areas. This review ensures that the plans align with the Unified State Plan and that they remain demand-driven with significant input from identified local industry representatives. The Council provides technical assistance to local areas in the development of their plans, if needed.

Designation of Workforce Development Areas

The Governor's Council recommends designations of local workforce development areas and will continue to work with local workforce areas on re-designation requests. Any contemplated changes in areas are discussed with all parties involved including the local elected officials, Workforce Development Boards, and service providers. Changes in workforce development areas are done only in the best interests of the State and the business and job seeker customers in that area.

Due to continued reductions in funding, and in an effort to increase funding for direct client services, Oklahoma has made a concentrated effort to work in conjunction with local areas to encourage them to seek re-designation and look at ways to streamline administrative costs. As an example of the state's efforts in this area to improve effectiveness and efficiency, since 2016, Oklahoma has reduced the number of local workforce areas from 11 to 6 and reduced the number of fiscal agents from 10 to 4 since 2010. Oklahoma has six (6) workforce development areas and four (4) fiscal agents.

Local Workforce Development Board Certification

The WIOA Section 107 states that the governor of the State, in partnership with the State Board, shall establish criteria for chief local elected officials in the local areas for the appointment of members of the local boards. The certification process is the key strategy to ensure Local Workforce Development Boards have the proper membership and structure to be highly effective in creating and continuously improving an aligned workforce development system, overseeing funds effectively and achieving established performance measures.

The Governor's Council approves the two-year certification process for the Local Workforce Development Boards. The policy, OWDI 03-2021, provides certification guidance and also clarifies local board membership nomination and appointment as well as the requirements for greater collaboration with stakeholders in their areas including economic development, education, organized labor, transportation, housing, and other sectors, with everyone moving towards the same goals to create community workforce solutions. As a convener of partners and employers, the Local Workforce Development Board has a key role in creating that alignment.

All local workforce boards must be certified by the State showing proper membership established by the governor and the U.S. Department of Labor.

The following Local Workforce Development Boards in Oklahoma have submitted the proper documentation to the Oklahoma Office of Workforce Development and after review by the Governor's Council Workforce System Oversight Committee (WSOC) for accuracy, the WSOC recommended to the full Council that the Local Boards be approved. The Governor's Council approved the Board certifications.

Local Boards that received a two-year certification:

- Central Workforce Development Board
- Northeast Workforce Development Board
- Western Oklahoma Workforce Development Board
- South Central Workforce Development Board
- Southern Workforce Development Board
- Green Country Workforce Development Board (initial certification through June 30, 2022)

Policy Alignment

Policy alignment for Oklahoma's workforce and economic development system is a foundational goal for the Governor's Council. Primary efforts to align policy among the public agencies involved with workforce development and to ensure that policy enhances service delivery to employers, job seekers, and all sub-populations covered by WIOA occur through the initiatives detailed in this plan and include: career pathways, performance and data, and the One-Stop system and Local Workforce Board certification processes. All of these efforts occur under the umbrella of the Governor's Council.

Leveraging Resources

The public agencies involved with Oklahoma's workforce development system have agreed within the parameters of their own unique missions, they will jointly collaborate to:

- Link workforce and economic development;
- Support the Governor's Council for Workforce and Economic Development plan and the governor's vision for an aligned workforce and economic development system;
- Create a demand-driven system;
- Respond to demand skills within targeted industries;
- Support the Workforce Partners Team;
- Build on the strength of each partner for the common good;
- Model state collaboration as an example for local entities to follow;

- Demonstrate agency commitment to common goals;
- Seek alignment of service delivery for better client access;
- Support and encourage local partnerships and joint planning; and
- Leverage and link program initiatives where possible for the purpose of achieving broader economic development goals.

The State conducts monitoring and provides technical assistance to local WDBs to ensure that WIOA Title I funds are not duplicated by other services. The State has encouraged regional planning for local partnership development and continues to find ways to add value to partners and increase participation in system operations.

As formula funding continues to fluctuate, Oklahoma will continue to explore workforce system efficiencies and effectiveness.

Oklahoma Regional Training and Development

The Governor’s Council for Workforce and Economic Development (GCWED) takes its role as the provider of training and development for the workforce system seriously. As such, training is focused on all system partners, in addition to the WIOA Core Partners identified in this plan. Training is provided annually at the Oklahoma Works Partners Conference in the spring of every year, as the result of a partnership with the Oklahoma Workforce Association (OWA), a group made up of state and local workforce staff. Training and Development often occurs in collaboration with other state agencies, and are provided as a result of public-private partnerships. Training is also provided on a variety of topics each year. A list of partnership organizations and resulting training and development provided by the GCWED are below.

Oklahoma Association of Workforce Development Boards (OAWDB)

GCWED provides staff support for an association run by the leadership of the local boards. The organization has been in existence for several years and has been a strong resource for the state board to receive local area input, and for the local areas to have opportunities to discuss issues across regions at an executive level. Historically, the GCWED partners with the OAWDB to provide training for local and state board members at least once per year. Opportunities include using meetings as strategy sessions, providing high-level strategy for all local areas to use, and using the venue for creative problem- solving for policy and systemic change.

Oklahoma Workforce Association (OWA)

The Oklahoma Workforce Association is an organization of all the core, required, and any workforce development partner wishing to enhance Oklahoma’s talent development. This organization was built on the premise that we cannot do it alone and must rely on the partners that have the expertise to fill in the blanks for our customers. The executive committee is made up of at least one member of each agency or organization involved in the Oklahoma Works system. With its vast membership OWA is responsible for coordinating and planning of the Oklahoma Works Partners Conference each year, to provide topics and information to benefit the whole system.

Their main purpose: To support the purpose of the Workforce Innovation and Opportunity Act, referred to as WIOA, to strengthen the Oklahoma workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the state, and to promote individual and statewide economic growth.

2. IMPLEMENTATION OF STATE STRATEGY

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

The System Oversight Subcommittee (SOS) is a work group composed of Oklahoma workforce development system partners led and established by the Workforce System Oversight Committee (WSOC), part of the Governor's Council for Workforce and Economic Development (GCWED).

SOS creates solutions to the barriers and hurdles preventing success across Oklahoma's workforce system. Its membership includes the following partners: the Oklahoma Department of Career and Technology Education, Adult Basic Education; the Department of Rehabilitation Services, Vocational Rehabilitation; the Department of Human Services; the Oklahoma Employment Security Commission, Wagner-Peyser; the State Regents for Higher Education; and Title I programs representing Adults, Dislocated Workers and Youth. The subcommittee actively seeks to extend their membership, inviting additional agencies such as the Department of Corrections, the Department of Health, and the Department of Mental Health.

The SOS and WSOC identify and review the policies and procedures that align, build, and improve the workforce development system in order to fully implement the objectives outlined in WIOA, contribute to Oklahoma's overall economic well-being, and implement the state's strategies.

Benefits of their involvement include:

- A more effective, consistent, user-friendly, customer focused, high quality service delivery approach for Oklahoma's citizens and businesses.
- Efficiencies for workforce programs and staff
- Alignment among education, workforce, and economic development
- Accountability for services and results, maximizing of all workforce development resources
- A true competitive advantage for Oklahoma's economic development efforts
- A pipeline of appropriately skilled and credentialed workers ready to meet the employment needs of Oklahoma's employers

In addition to required programmatic activities, Oklahoma strives to align the core partner programs and additional partners through the following activities.

Research and Evaluation

Oklahoma recognizes the weaknesses it has faced in the past regarding access to and the possession of data critical for the success of the workforce system. Increased capacity, aggressive efforts to coordinate the resources expended on evaluations, and expansion of the available tools at both the state and local level allow OOWD to lead the way in strengthening the aligned efforts of the core program partners, required partners, and additional partners within the workforce system. The COVID-19 Pandemic presented opportunities in several different areas of system engagement for the core and required partners to better support and interact with each other ultimately benefitting the Oklahomans seeking services. As the workforce system returns to a more standard service approach, engaging system partners in both research and evaluation will be critical for the evolution of the workforce system. A priority on our research and evaluation efforts will strengthen future strategic planning efforts in our post-pandemic recovery as a state.

Career Pathways

Working with educational institutions and Adult Basic Education, Oklahoma works to expose adult learners to viable career pathways leveraging resources to provide opportunities leading to certificate, degree, or credential.

Education and Industry Partnerships

Engaging business in the development of education and training and exposing educators at a variety of levels to the operations and needs of industry provides students with more exposure to demand industries and occupations.

Individual Career and Academic Plan (ICAP)

The Individual Career and Academic Plan (ICAP) equips students with the tools needed to create a meaningful exploration of college, training and career opportunities. ICAPs incorporate labor market data specific to Oklahoma and provides a tangible accomplishment with the flexibilities appropriate to students' changing passions, aptitudes, interests and growth.

Business Services Expansion

With the changes in Oklahoma's political leadership an emphasized focus on providing businesses in the state with the workforce they need has become a priority for partners across the state. Title I funding provides the state ample flexibility to develop and expand business services across the state. Providing local areas with funds to increase capacity specific to business and industry needs as allowable by WIOA the statewide initiative will become a standard practice. At the local level, core partners convene to strategize around recruitment, retention, and support of employers to deliver business services as a unified workforce development system and disrupt the siloed perceptions employers may have about partnering with state agencies.

Sector Partnerships

Oklahoma provides funding to support the establishment, strengthening, and expansion of sector partnerships, including local and regional coordination of sector partnerships, sector strategies and the identification of partnerships for career pathways development. Sector partnerships focus on increasing education attainment, expanding registered apprenticeship programs, and filling occupations on the critical occupations list(s).

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

The Governor's Council for Workforce and Economic Development (GCWED), with input from state workforce partners, local areas, and business leader members, adopted a strategic plan for achieving WIOA implementation and strategy alignment with the Governor's vision. Included in the plan are four objectives and sub-strategies aligned to the Governor's workforce committee plan.

Objective 1: Expand Oklahoma's Workforce to satisfy industry and economic development goals

- Support career exposure, exploration, and pathways for high school students
- Increase targeted programs for special populations
- Analyze barriers to employment for Oklahomans
- Expand adult basic education and high school equivalency services/programs

Objective 2: Upskill Oklahoma's Workforce

- Expand Registered Apprenticeship and other work-based learning opportunities
- Strengthen education's focus on career readiness
- Increase high school equivalency attainment
- Increase the percent of Oklahomans with a postsecondary credentials/degree

Objective 3: Offer Workforce solutions to Oklahoma's businesses

- Engage businesses in program design and service delivery
- Develop and provide responsive recruiting tools
- Launch incumbent worker training
- Develop strategic Business Services plan
- Launch skills-based hiring pilot
- Expand sector partnerships

Objective 4: Build Oklahoma's Workforce System capacity

- Drive innovation
- Diversify funding
- Expand data assets and usage

In order to achieve the ambitious goals that have been set by the Governor's Cabinet, workforce partners must align their efforts and take active roles in ensuring resources are used in ways that maximize, strengthen, and support the education to workforce pipeline for all Oklahomans. Underpinning all Oklahoma Works efforts are the five Industry Clusters (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution), and 100 Critical Occupations within these ecosystems (growth and demand occupations). These foundational pieces are utilized by state and local economic development and tie partner initiatives together in an aligned, cohesive direction.

The Core Partners and required and optional one-stop delivery system partners are engaged in education and training activities at the state/system level. Currently, the Workforce System Oversight Subcommittee, the working arm of the Workforce System Oversight Committee of the Governor's Council for Workforce and Economic Development, is tasked with developing the system-wide framework and policy documents that will comply with WIOA legislation and Federal regulations, and are tasked with compliance review of the system. To support the oversight of an efficient and equitable workforce development system, the Governor's Council has prioritized the development of dashboards for data-driven decision-making based on customer satisfaction surveys and performance indicators.

The Governor's Council for Workforce and Economic Development (GCWED), the WIOA State Board, is tasked with using data to inform policy, track progress and measure success toward federal, WIOA measures and state metrics identified through the strategic planning process. The GCWED Strategic Plan assists partners with aligning education and training programs to meet the talent demands of Oklahoma employers. This alignment aids in the development of a comprehensive workforce development system within each region that:

- Creates user-friendly, customer-focused service delivery models that transcends agency programs and silos;
- Provides consistent, high-quality services to employers and job seekers throughout the state;
- Ensures services to employers and job seekers are consistent, while encouraging local and regional adaptation; and
- Creates stellar customer focus, program alignment and partner collaboration.

Each region's system is the "network of mandatory and optional partners, programs, centers and service providers that collectively address the community's workforce development needs. To create this workforce development system, partners must:

- look at the system holistically;
- look at where their particular agency and its services fit into the larger vision; and
- commit to jointly producing the tools and processes needed to implement a workforce system.

The process evaluates:

- how well partners are working together to create a skilled and credentialed talent supply chain to help employers grow and prosper
- whether a region has built a local workforce development system from all of the local players who provide workforce development services and products to job seekers, trainees, and businesses within the region.

The process verifies that a region has implemented an effective and comprehensive workforce development system strategy that includes:

- A community-wide unified workforce development plan based on the competency requirements (skills, knowledge, and abilities) needed for current and future local jobs that are key to community growth and prosperity
- A common workforce development vision shared by all partners within the community
- Common goals to reach that vision shared by all partners within the community
- An approach to serving job seekers that is integrated across all the partner agencies

An approach to serving businesses that is integrated across all the partner agencies

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Oklahoma believes the coordination, alignment and provision of services will further enhance the customer experience. In order to promote a seamless service delivery, key stakeholders such as the State Administration, Workforce Development Boards (WDB), Oklahoma Works Centers, and other Core Partners collaborate to develop an integrated approach to providing quality, customer driven, value-added services. As a state, we realize the importance of nurturing a partnership with the core programs defined in WIOA and business. Creating this partnership will allow all stakeholders to have input and buy-in to the one-stop seamless delivery of services. This approach will effectively organize staff and facilities in a manner that further streamlines customer service delivery, capitalizes on the strengths of staff, location, and technology capabilities. All these efforts will reduce duplication, save diminishing resources, increase customer satisfaction, and better develop our valued service delivery professionals.

Common performance measures also encourage joint responsibility for the success of all customers across the core programs and ensure access as well as the delivery of available one-stop services. Staff provide access to services based upon the customers' assessed need. Whether customers access services at a comprehensive center, an affiliated site, a network of eligible one-stop partners or a specialized center as described in WIOA § 678.300, they will be provided information on the availability of career services, training services, program services and activities offered and/or provided.

Coordination and alignment within the Oklahoma Works Centers is achieved by two main processes required by policy set forth in Oklahoma Workforce Development Issuance (OWDI)

04-2016, Change 1 Local Elected Official (LEO) Consortium Agreement. The policy change was implemented in May 2021 based on local area monitoring best practices for consortium agreement language, signatures, and processes for documenting consortium membership. OWDI 04-2016, Change 1 requires each area's LEOs to enter into an agreement; this agreement identifies the responsibilities of the LEOs collectively. One requirement is to agree on a Memorandum of Understanding (MOU) developed and executed by the Local WDB. The MOU is the result of the negotiations between one-stop partners, relating to the operation of the one stop delivery system and approved by the CLEO in the local area as described in WIOA § 678.500. The MOU covers items such as: description of services to be provided in the one-stop system; an agreement on funding costs of services and operating costs of the system including infrastructure costs; funding of shared services and operating costs for one-stop delivery system; methods for referring individuals between partners for appropriate services; and procedures ensuring customers with barriers to employment, including those with disabilities, are addressed by providing access to services, whether in person or virtual, are available through the one-stop delivery system. Alignment of services will more accurately reflect to state and federal mandates, stakeholders, the public, and other interested parties on how the public workforce system is meeting the needs of business, the workforce and contributing to economic growth.

Another requirement in the consortium agreement is to agree on designation and certification of a one-stop operator through a competitive process developed and executed by the Local WDB. A one-stop operator that has been competitively procured will ensure that all one-stop partner services are coordinated and are provided in accordance with federal, state and local policies. This will assure seamless service delivery and oversight.

Oklahoma recognizes the need to provide career services through the one-stop system by the required one-stop partners defined in the WIOA. The first service option is basic career services. The first option consists of providing information on available services in the one-stop center, initial assessments, eligibility determinations, career planning, access to the career resource room for computer assistance and self-service options, resume preparation assistance, labor exchange services, labor market information, referrals to other system programs, demand occupation lists, eligible training provider lists, available supportive services, meaningful assistance for unemployment assistance claimants, and financial aid assistance.

Individualized career service is the second service delivery option. In this option customers have access to: customized assistance and specialized assessment of their skills knowledge and abilities to assist in career planning; diagnostic testing and other assessment tools, in depth interviewing and evaluation; development of the individual employment plan; training services which may include short term pre-vocational services, on-the-job training opportunities, internships and work experiences, English language acquisition; financial literacy services and out-of-area job search and relocation assistance.

Third, follow-up services must be made available as determined appropriate by the Local WDB, for a minimum of 12 months following the first day of employment, to adults or dislocated workers who are placed in unsubsidized employment. Priority of services to Veterans and other eligible persons will continue to be Oklahoma's priority. Additionally, the commitment to serve the individuals listed in the WIOA legislation such as persons with disabilities, unemployment insurance recipients, long-term unemployed, dislocated workers, low income individuals, limited English proficiency individuals and youth still remains and will continue be a focal point in the one-stop service delivery.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

Under the leadership of the Governor and the Governor's Council (State Workforce Board), the Core Partners are expanding their focus on employer services to cultivate engagement and productive relationships among business leaders in the private sector, Oklahoma's education

and training systems, and other workforce partners. These strong relationships will facilitate essential knowledge sharing and encourage the alignment of statewide and regional business and industry needs with the skills taught throughout Oklahoma's education system.

One of the local board's roles is to coordinate workforce investment activities with economic development strategies through regional planning. Board representatives include all required system partners as well as employers that are representative of the local areas economic drivers. Workforce Boards are employer driven and service delivery strategies are determined by employers needs and implemented by the partnership.

Oversight of the system falls upon the Governor's Council whose mission is to assist the Governor in the development, recommendation and implementation of policies and programs within the workforce system. The Governor's Council operates in accordance with the functions contained in WIOA to oversee Oklahoma's Workforce Development System. The purpose of the Governor's Council is to:

- Guide the development of a comprehensive and coordinated workforce development system for the state; and
- Through LMI analysis ensure equity in service delivery and educational programming to populations experiencing higher unemployment, lower earnings and communities impacted by COVID ; and
- Review and make recommendations that will align the workforce system, including education, with the economic development goals of the state for the purpose of creating workforce and economic development systems that are integrated and provide Oklahoma a competitive advantage in a global economy.

Members of the Governor's Council representing organizations, agencies, or other entities are individuals with optimum policymaking authority within their organizations, agencies or entities. In order to provide the Governor with wide-range perspective on workforce policy issues, the members of the Governor's Council represent diverse regions of Oklahoma, including urban, rural, and suburban areas from both the public and private sectors.

A major driver in coordination of employer needs is the Workforce System Oversight Committee of the Governor's Council. The Workforce System Oversight Committee is co-chaired by a member from the private sector and a member from the public sector. The Oversight Committee makes decisions on program governance, policy, and capacity building for the Local Workforce Development Boards and partnerships helping assure policies and practices are business driven.

The Governor's Council, Local Workforce Development Boards, and regional planning coordination of services to employers will create the driving force and synergy needed to build a well-trained, dynamic workforce that will meet the needs of the 21st Century employers, generating wealth for all.

Employer Services Offered by Workforce Partners include:

Wagner-Peyser at the Oklahoma Employment Security Commission

- Talent Acquisition Teams work with local employers to understand their business and the needed experience, training, and expertise for employees.
- Local Employer Councils offer educational presentations for employers surrounding relevant employment needs.
- Job Fairs are held regularly across the state connecting employers and job seekers.

- On Site Recruitment Events are held at the Oklahoma Works Centers statewide.
- An intuitive Labor Exchange System, OKJobmatch.com or its replacement, connecting employers with capable, qualified applicants, providing staff-assisted service to expedite filling job openings with qualified, talented employees, and featuring user-friendly applicant management tools.
- Rapid Response Services are provided with the goal of helping affected workers move into new employment as quickly as possible.
- Labor Market Information, both timely and relevant, is provided regarding Oklahoma and the U.S. economy.
- Work Opportunity Tax Credit is offered to employers as an incentive to hire individuals who are members of targeted groups which have traditionally faced significant barriers to employment.
- Federal Bonding provides a fidelity bond for at-risk job seekers that protects the employer in case of any loss of money or property due to employee dishonesty.
- Assistance in applying for potential services under the Trade Adjustment Assistance program for those employers who may be experiencing downturns and otherwise qualify.
- Pre-employment assessments to measure job candidates' proficiency in typing, data entry, Microsoft Word and Excel.
- Job fairs and hiring events for employers through Veterans. The LVERS representatives serve four separate regions across the state: Central, Northeast, Southern and Western.

Adult Basic Education at the Oklahoma Department of Career and Technology Education

- Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency.
- Assist adults who are parents or family members to obtain the education and skills that
 - Are necessary to becoming full partners in the educational development of their children; and
 - Lead to substantial improvements in the economic opportunities for the family.
- Assist adults in attaining a secondary school diploma or its recognized equivalent and in the transition to postsecondary education and training, through career pathways; and
- Assist immigrants and other individuals who are English language learners in
 - Improving their – Reading writing, speaking, and comprehension skills in English; and Mathematics skills; and
 - Acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.

Vocational Rehabilitation Services at the Oklahoma Department of Rehabilitation Services

- Vocational Rehabilitation and Services to the Blind and Visually Impaired staff help employers reduce turnover by matching qualified, job-ready applicants to job requirements.

- Provide pre-employment testing and offer job-related training for individuals we refer. On-the-job training and support services can be customized for the employee, if needed.
- Provide follow-up services to ensure employees' success on the job and help with affirmative action programs by referring qualified applicants with disabilities.
- Assist employers with and needed job accommodations.

Title I Programs at the Oklahoma Office of Workforce Development

- Administer adult, dislocated worker, and youth WIOA programs. Provide Rapid Response Services with the goal of helping affected workers move into new employment as quickly as possible
- Provide job fairs to veterans and their families
- Encourage the use of the Benefits Cliff software to provide for smooth transitions and alignment among programs that support low-income jobseekers
- Offer customized business services including such things as Incumbent Worker Training, Registered Apprenticeship Program development, Sector Partnership development, skills based hiring and providing labor market information to employers

Local Workforce Development Boards

- Local workforce development boards and Oklahoma Works Centers provide job fairs for laid off employees, population groups experiencing higher unemployment, and veterans which helps local employers who are hiring get seasoned employees
- Teach the Skillful program to employers to ensure more equity in hiring practices
- Work with local employers to understand their workforce needs
- Assist in developing Sector Partnerships
- Training to meet the needs of employers
- Offer Registered Apprenticeships to businesses
- Refer businesses to partners that can meet their needs
- Incumbent Worker Training – Training to upskill and retain existing employees

Registered Apprenticeships

- Oklahoma is actively working to expand and diversify RA in the state
- The U.S. Department of Labor, Office of Apprenticeship has over 100 active RA programs in Oklahoma through which companies are gaining trained employees

Oklahoma Department of Commerce

- Helps employers get in touch with sources for a trained workforce
- Provides incentives to qualifying companies that create well-paying jobs
- Connects employers to customized training resources Oklahoma is also planning on utilizing the peer-to-peer TA opportunities provided by the USDOL on business services.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Analysis of the educational attainment gap data in Oklahoma continues to show how important both technical degrees and traditional degrees are to the future of Oklahoma's workforce and economy. While the data often supports prioritizing one over the other, depending on current need, consistent engagement and partnership with Oklahoma's educational institutions is critical for the state's success. The state's priority is to fill immediate workforce needs but also continue to develop Oklahoma's labor force.

The Governor's Council for Workforce & Economic Development includes representation from K-12 education, higher education (two and four year institutions), and career and technical education.

Oklahoma's Strategies for partner engagement with education and training providers include: Developing, aligning and connecting the education and training pipeline with the needs of the state's regional economies by coordinating priorities and plans across the education and the workforce system. Oklahoma is aligning and connecting across state agencies, including two year, four year, and career and technical education institutions, as well as in the local areas among state agencies and businesses, and from the local areas to the state level. The State's priorities include: the ongoing development of career pathways, increasing credential attainment, identifying areas to support individuals at risk of dropping out of post-secondary education, and increasing and diversifying Registered Apprenticeship Programs.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

The Governor's Council for Workforce and Economic Development has developed a policy in accordance with WIOA for the application process to be used by schools wishing to be on the eligible training provider list. The intent is to create as many pathways to education as possible for interested student/participants. Eligible training and education providers will strategize how we can update our services to be more job-driven and meet employers' needs. Using the state's strategies, we will collaborate with our educational leaders and partners to create accessible training programs that meet the needs of our customers and will provide them with meaningful training. Oklahoma's education leaders include the State Superintendent of Public Instruction, Chancellor of the State Regents for Higher Education, and the Director of the Oklahoma Department of Career and Technology Education.

For training providers to receive WIOA funds for the provision of training services, they must meet certain performance and reporting-related criteria to be included on the Eligible Training Provider List (ETPL). This does not apply to Registered Apprenticeship (RA) programs as these evidence-based programs are placed on the statewide ETPL automatically.

Oklahoma's Eligible Training Provider List (ETPL) is available electronically at the OKJobMatch.com website. This list is an important tool for participants seeking to earn credentials, certificates or degrees in one of Oklahoma's targeted occupations. Oklahoma's list offers a wide range of programs, including classroom, online, and registered apprenticeships. Another important tool for participants is the Oklahoma Career Guide website. OK Career Guide is the state's computerized career information system. It is an easy online tool available for all Oklahomans to explore and guide their future. Individuals can take assessments, identify occupations, and establish education plans. It is a critical tool for middle and high school students as well as adults to access current career and labor market information.

RA programs technically turn Oklahoma employers into training providers. While prioritizing education and training resources to support placement into high demand occupations, Oklahoma businesses will be able to provide the hands-on training to build the skilled workforce they need to succeed. Oklahoma is focusing on an expansion of RA programs in the state, which will focus on creating and expanding RA opportunities.

Through Oklahoma's New Skills for Youth grant efforts, outcomes from the Career Readiness Initiative aligned K-12 career pathways and programs with the high-skill, high-demand needs of

business and industry to better prepare students for success in college, technical/STEM careers and the 21st century world of work. This work has helped the state assure career pathways efforts are a part of every in-school youth's education experience.

The CareerTech Skills Centers School System is a division of the Oklahoma Department of Career and Technology Education. Skills Centers specializes in the delivery of career and technology education to inmates under the supervision of the Oklahoma Department of Corrections and juveniles under the supervision of the Oklahoma Office of Juvenile Affairs. The intent of this division of ODCTE is to continue to evolve as business and industry changes. The goal is to provide educational services that will cause skills centers students to seek and find success in the workplace and in society. Preparing these inmates for a successful transition and reentry by training these individuals for high wage, high skill, and/or high demand jobs is necessary to reduce recidivism and assist individuals in becoming productive members of society as well as closing the skills gap for our business and industry.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

CTE Programs of Study

One of the requirements of WIOA is that Perkins Act recipients are mandatory partners. For Oklahoma this will mean that public school career and technical education programs, technology centers, and almost all of Oklahoma's community colleges will strive to increase postsecondary opportunities for students in high school and improve workforce readiness. This has and will continue to occur through programs of study, which are utilized in Oklahoma to link secondary and postsecondary education with occupational outcomes and industry certifications and credentials. The intentional partnerships between secondary education, postsecondary education, and business and industry allow the state to streamline its secondary and postsecondary education and instruction with that of the workforce needs.

Programs of study must lead to two of the following three: high skill, high wage, and/or high demand occupations. Oklahoma defines a high wage career as one with an average hourly rate equal to or greater than the average hourly rate of all occupations as reported by the Oklahoma Employment Security Commission. A high demand industry is defined as an occupation in which state, local, or regional labor market data show that demand exceeds projected employment supply. High skill occupations require an industry recognized certificate, credential, postsecondary training, apprenticeship, or degree

- Courses include rigorous, coherent CTE content aligned with challenging academic standards.
- Eligible recipient's Program of Study must offer students the opportunity to earn a postsecondary level industry certification and/or licensure or an associate or bachelor's degree.
- Postsecondary eligible recipients should ensure that academics are an integral component of all Perkins-funded CTE programs.

Each approved CTE program of study will include a specific non-duplicative sequence of CTE courses and the appropriate rigorous academics required to prepare CTE students for success in postsecondary education and the high-skill, high-wage, or high-demand workplace. CTE programs incorporate content aligned with challenging state and national academic standards in language arts, mathematics, and/or science. State recognized CTE technical skill and academic assessments benchmark student attainment of both academic and technical skills.

Skills Centers

Over the forty-plus years of serving incarcerated offenders in Oklahoma, Skills Centers have evolved from a division with a few occupational training programs to a large school system with

a multitude of programs and services for both adult and juvenile offenders. CareerTech has partnered with the Oklahoma Department of Corrections and has established 11 Skills Centers within correctional facilities that provide career and technical training opportunities to incarcerated individuals. Adult Basic Education is offered in most of these correctional facilities that also offer career and technical training programs. This allows funding to be provided that 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.

A successful transition from corrections to the workplace can mean a life of success for ex-offenders. To prepare offenders for successful transition, career and technical education, employability and life skills are integrated into this educational delivery system. Skills Centers students may seek certifications recognized by both state and national industries. The Skills Centers provides 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 works in conjunction with the Oklahoma Department of Corrections (DOC) 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.

Through these and other programs the state will be able to leverage existing state, local, and federal investments and financial resources that enhance access to workforce development programs.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

Work Based Learning, specifically, Registered Apprenticeships, is a continued priority for the state. Oklahoma's Secretary of Commerce and Workforce Development has established goals to expand Registered Apprenticeships and has tasked the Governor's Council for Workforce and Economic Development with establishing strategies to achieve those goals. Currently, Oklahoma is a grant recipient for three (3) different grants designed to support, expand, and diversity Registered Apprenticeships. Strategies include:

- Expanding staff capacity to ensure Oklahoma's ability to develop and execute strategies.
- Develop outreach and communication plans to increase the public awareness.
- Ensure more WIOA participant have access to Registered Apprenticeship opportunities.

Another Oklahoma priority is the development of strong sector partnerships across the state. The state uses WIOA Governor's set-aside funding to accept applications for and award grants to industry focused sector partnerships. Successful applicants are tasked with completing work that significantly impacts training programs and the how those training programs meet the need(s) identified by industry leaders and experts.

Additionally, Oklahoma's state partners have identified the need to support individuals who are currently enrolled in a post-secondary program but are at risk of not completing those programs. The investment needed to assist eligible individuals is minimal compared to the cost of a training program and by providing this investment the state is ensuring local and state funding is available to serve more participants expanding Oklahoman's access to post-secondary credentials and certificates.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

Oklahoma recognizes that workforce development must be linked to economic development. That is the reason Governor Kevin Stitt chose to make the Oklahoma Department of Commerce the Title I administrative entity effective December 31, 2019. Additionally, the link between workforce and economic development are made in several ways and at several levels.

Partnerships with the Oklahoma Department of Commerce

The Oklahoma Department of Commerce partners to provide data support and economic development expertise. The Department of Commerce helps promote the resources and services available through WIOA Core Partner agencies. They also employ Rural Development Specialists (RDSs) who live and work in their assigned areas across the state. The RDSs call on companies, provide resource referrals as needed, and build relationships with 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. 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.

Labor Market Data

The workforce division and research division of Oklahoma department of Commerce both provide data used by the Governor's Council for Workforce and Economic Development in key decision making. The Commerce research team provides more economic development data while the workforce division provides more workforce development data. Both economic and workforce development research overlap and contribute to the strategic efforts of the state workforce system.

Statewide Career Exposure Week

The weeklong event connects local students with area businesses to give future talent the opportunity to explore the career possibilities in Oklahoma. Career Exposure Week events allow local businesses and employers to showcase critical careers in demand industries, to inspire and recruit new talent, and give all levels of the talent pipeline a front row seat to experience the wide array of careers available within the State. Sponsored events range from hosting on-site job shadow experiences, industry tours, classroom presentations or other activities targeted to students in K-12 and beyond. Oklahoma Career Exposure Week was created to:

- Empower Oklahoma businesses and industries in the state's ecosystems and regions to engage with educators, students, parents, and others about career opportunities.
- Change misconceptions of Oklahoma's demand and critical occupations.
- Draw attention to the roles businesses and industries play in communities across the state.
- Underscore the economic and social significance of demand and critical occupations and businesses and industry

Economic development organizations are among the partners who make this annual event successful, including organizations like the Tulsa Chamber and the Duncan Area Economic Development Foundation. Oklahoma continues to work with partners to expand Career Exposure Week as a way to prepare youth and individuals with barriers to employment for the workforce.

Governor's Summit on Economic Development and Workforce

In 2019, Governor Stitt hosted the Governor's Summit on Economic Development and Workforce. The event brought together business, economic development and workforce leaders to focus on the alignment of state priorities.

Due to the Covid-19 pandemic this event has not been held since. However, other activities have been held to connect Oklahoma's economic development community with workforce. In November 2021, the Governor's Council for Workforce and Economic Development held a

board training and retreat event in Oklahoma City. The event was designed to connect council members with timely workforce information to better craft policy for the state of Oklahoma.

COVID-19 Pandemic

During the Covid-19 pandemic we have worked closely with our local workforce boards. We believe our six boards have been best suited to address and identify needs at a local level. Our workforce boards have partnered with community-based groups in identifying a variety of needs created by this pandemic. Some of those needs go far beyond the scope of the existing workforce system and include supportive services such as childcare, rental assistance, homelessness, food insecurity, clothing among other needs.

While Oklahoma is now seeing record low unemployment, we know many of these needs have not gone away. Employers are struggling to fill key occupations, while the pandemic has caused disruptions to supply chains and other key parts of the economy.

Oklahoma is focused on maximizing its labor-force participation rate to get as many Oklahomans who want to participate in the labor-force working as possible. While the pandemic has caused serious disruptions, Oklahoma remains undeterred in leveraging its workforce system to maximize the number of people who can participate and ensure equitable access across the state for all Oklahomans.

As more Oklahomans can find work, we are optimistic some of the economic problems exacerbated by the pandemic will improve in those communities that have been most affected. Our partnerships through economic development are designed to help job-seekers find employment in high wage in-demand positions.

B. STATE OPERATING SYSTEMS AND POLICIES

Oklahoma's State Operating Systems and Policies are described below.

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF-

Oklahoma uses OKJobMatch.com, operated by AJLA, as its statewide job bank and case management system. The current system is available for job-seekers looking for work in all 77 counties as well as providing employers a place to search for talent and post jobs. It also serves as the module where colleges, universities, vocational schools, and other private training providers can complete and submit virtual applications for authorization to service as eligible providers of training programs to WIOA customers in the state. AJLA coordinates case management for programs operated by OESC (Title III) and OOWD (Title I) under WIOA.

Adult Basic Education at the Oklahoma Department of Career & Technical Education (ODCTE) 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, student goals, and deliver results and streamline data reporting to state and federal agencies.

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.

The OklahomaWorks.gov website serves as the comprehensive platform for many of Oklahoma's workforce development activities.

AJLA was chosen as the state's labor exchange and case management system. Oklahoma elected to implement FiscalLink, AJLA's fully integrated fiscal management module to assist with annual report requirements for the state to OKJobMatch, Oklahoma's virtual case management system. FiscalLink works to provide a real-time seamless fiscal system for one-stop case management. FiscalLink aids with tracking of training and career service costs per participant as well as producing reports.

The FiscalLink implementation was a collaborative effort between local area representatives, the Oklahoma Employment Security Commission (OESC), OOWD, and AJLA. This included data collection, data validation, data conversion, user acceptance testing, and implementation training.

OKJobMatch is an integrated, vendor hosted system supporting labor exchange for employers and job seekers, case management for program requirements, training providers and approved programs, reporting capability for all required federal, system and activity reports, and some interface with Unemployment Insurance. The system consists of components with appropriate features depending on the user.

JobLink is a self-service job matching and workplace information service for employers and job seekers. Job seekers can establish an internet account to manage their job search activities and register with the Employment Service to receive basic and individualized career services. Job seekers can create a robust resume and Unemployment Insurance claimants can register for work. Employers can establish an account to manage job openings and view job seeker resumes and if requested, staff will assist employers with account creation and development of job orders.

ServiceLink is a client management application that allows case managers to track their caseload and report information required under Labor Exchange, Reemployment Services, WIOA, TAA (TRA Adjustment Act) and other federal programs. The application provides a standardized process for following participants through the workforce development system network. It eases the load for case managers by providing a tool that can manage and monitor caseloads, assess employment barriers, establish training and employment plans, search for service providers and WIOA eligible training providers and programs, and track job placements. ServiceLink collects all information required to generate reports for these federal programs.

FiscalLink allows case managers and program administrator the ability to process participant and vendor payments for all WIOA programs including NEG (National Emergency Grants), and TAA activities.

ReportLink is a web-enabled federal reporting data management system providing WIOA, TAA, Labor Exchange and WISPR reports.

Covid-19 Pandemic

Oklahoma is continuing to evaluate the impact of the Covid-19 pandemic on its labor markets.

Since the pandemic began, Oklahoma has watched its unemployment rate go from a record high of 13.0% in April of 2020 to a record low of 2.7% in November of 2021. These same numbers have followed a similar pattern in all 77 counties and 6 local workforce areas.

OOWD, with the help of other workforce partners, is working with job-seekers and employers on creative ways to help people find employment and for employers to fill key jobs. OOWD also

helped sponsor virtual hiring events in 2020 when large in-person career fairs with employers from multiple states were difficult to organize in-person.

OOWD has increased its focus on work-based learning. It has signed numerous companies to agreements with the US Dept. of Labor for apprenticeships, including manufacturers in aerospace, defense and other key industries.

As the pandemic continues to evolve, OOWD will continue watching labor market data and using innovative strategies to provide employers and job-seekers with the best opportunities.

Currently, workforce programs including Wagner-Peyser (Title III), WIOA Title I Youth, Adult, and Dislocated Worker Programs, National Dislocated Grants, and Apprenticeship Grants utilize Oklahoma's virtual case management system, OKJobMatch for data collection and reporting processes.

OKJobMatch is a vendor hosted management information system provided by America's Job Link Alliance - Technical Support (AJLA-TS). OKJobMatch houses data collection applications JobLink, ServiceLink, ProviderLink, FiscalLink, and ReportLink. Each data collection application is compliant with WIOA Section 116 which requires the establishment and operation of a fiscal and management accountability information system based on guidelines established by the Departments. Wagner-Peyser and Title I works with AJLA-TS to ensure that data is collected in accordance with WIOA Section 116 and The Participant Information Record Layout (PIRL) established by the Departments. AJLA-TS provides appropriate PIRL files and Workforce Integrated Performance System (WIPS) is utilized to verify the data and verify any errors present within the PIRL files. Once errors are corrected and data is verified, the PIRL files are then uploaded, certified, and submitted to the Department of Labor.

The Oklahoma Office of Workforce Development, in conjunction with the Oklahoma Employment Security Commission (OESC), work continually to ensure that OKJobMatch.com is efficiently meeting all federally and state mandated reporting and performance requirements. The data collection and reporting goals of the Oklahoma Office of Workforce Development (OOWD) are to ensure the timely, complete, and accurate collection of participant data at intake which provides the State and Local areas the ability to evaluate and project performance, evaluate and project program outcomes, share reliable data across core partners, maintain data integrity and provide accurate performance reports. OKJobMatch.com reporting features provide the ability to run performance and case management reports at any time providing real time data which allows OOWD, Local Boards, One Stop Operators, and Service Providers to monitor data and performance as needed. WIOA Quarterly and Annual Reports are available to view at any time with the understanding that the data can change daily and an official report is not available until 45 days after the end of the reporting quarter.

The data collection and reporting goals for OESC are accurate data when pulling OKJobMatch quarterly reports 45 days after the end of the reporting quarter and UI wage information provided by employers on a quarterly basis. Both OKJobMatch quarterly reports and UI wage data are available on a quarterly basis, specifically 45 days after the end of the reporting quarter.

Adult Basic Education at the Oklahoma Department of Career & Technical Education (ODCTE) 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 data specialist to easily set baselines, track program progress, student goals, and deliver results and streamline data reporting to state and federal agencies. ODCTE and LACES are working to finalize data transfer to the AJLA case management system to allow for data reporting to the local boards on a quarterly basis.

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. OKDRS and AWARE recently finalized a data transfer process to the AJLA case management system to allow for data reporting to the local boards on a quarterly basis.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (E.G., 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

All Oklahoma Works workforce system policies will support the alignment of service delivery. Policy development and process is a collaborative approach, utilizing the System Oversight Subcommittee (SOS) members who draft and revise system policy as well as subject matter experts and workforce development stakeholders who provide feedback to policies as they are developed. The Workforce System Oversight Committee (WSOC) reviews all policy upon release and the Executive Committee is available as back-up if needed. The Governor's Council for Workforce and Economic Development ratifies all committee-approved policies. The full list of current policies can be accessed through the Oklahoma Works website at: <https://oklahomaworks.gov/localworkforce-boards/wioa-policy-center/>.

Guidance for partner program contributions to the one-stop delivery system are established at the local level and guided by OWDI #24-2017, Change 1 Memorandum of Understanding Guidance and MOU Toolkit Infrastructure Funding Agreements (IFAs) and the State Funding Mechanism (SFM), under the Workforce Innovation and Opportunity Act of 2014 (WIOA), Phase II. Further guidance is offered in GCWED Guidance Letter #02-2017 on Infrastructure Cost Sharing.

Consistent state level partner meetings of executive level core partner leadership and the collaboration of system partners on the System Oversight Subcommittee ensures that there is a process for feedback and alignment across the local areas on behalf of the state partners as additional policy and processes are developed to establish expectations for partner contributions.

State Policies

The active policies that support implementation of state strategies are as follows:

- **OWDI 04-2021 Performance Incentive Awards for Local Workforce Boards:** To outline the criteria for awarding incentives to Local Workforce Development Boards for Program Year performance.
- **OWDI 01-2021, Change 1 WIOA Case Management and Common Exit:** To develop and implement procedures for the operation of the Period of Participation, Categories of Enrollment, Categories of Exits, Services, Career Services and Training Service Costs under WIOA and to clarify various aspects of the operational parameters and specifications of these categories.
- **OWDI 05-2021 Sub-grantee Risk Assessment:** To establish a system of accountability to ensure an optimum return on federal funds invested in programs and activities administered by local workforce development areas (LWDAs).

- **OWDI 11-2020 Access for All Star Accessibility Framework Phase I – Initial Assessment:** To provide guidance for the initial implementation of the Access for All Star Accessibility Framework for the review of certified comprehensive and affiliate Oklahoma Works American Job Centers.
- **OWDI 08-2020 Special Issue and Investigative Monitoring:** To communicate and implement the process for Special Issue/Investigative monitoring for recipients of federally-funded programs and grants administered by the Oklahoma Office of Workforce Development.
- **OWDI 04-2020 Selective Service Registration:** To provide guidance regarding selective service registration requirements for potential participants in WIOA Title I programs.
- **OWDI 03-2020 Fraud and Incident Reporting:** To provide guidance on expectations and requirements for immediately reporting information and complaints involving criminal fraud, waste, abuse, or other criminal activity in accordance with TEGL 2-12 and 20 CFR 683.620.
- **OWDI 02-2020 Sanctions and Resolution Process:** To communicate and implement the sanctions and resolution processes for sub recipients of federal and state grants administered by OOWD.
- **OWDI 01-2020 Business Services** To provide guidance to the local workforce development boards and core partners for the provision of Business Engagement and Business Services.
- **OWDI 08-2019 Adult and Dislocated Worker 40% Minimum Training Expenditure Rate:** To provide guidance for the State’s required 40% minimum training expenditure rate of the Title I Adult and Dislocated Worker funds.
- **OWDI 09-2019 Incumbent Worker Training Services:** To provide guidance to local workforce development boards (LWDBs) regarding participant eligibility for Incumbent Worker Training (IWT) and employer eligibility for IWT reimbursement.
- **OWDI 07-2019 Use of Grant Funds to Pay for the Cost of Meals, Food, Coffee or Other Refreshments:** To provide guidance to the Local Workforce Development Boards on the provision of utilizing Federal funding to provide meals for external customers and employees.
- **OWDI 06-2021 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.
- **OWDI 02-2021 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.
- **OWDI 05-2018, Change 1 Oklahoma Works Waiver Request Policy:** To provide guidance to 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.

- **OWDI 01-2018, Change 1 Nondiscrimination and Equal Opportunity Complaint Procedures:** To provide guidance on the WIOA Section 188 Discrimination and Complaint Procedures.
- **OWDI 05-2019 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.
- **OWDI 14-2017, Change 2 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.
- **OWDI 04-2019 Assessments:** To provide guidance on the assessment practices that are to be utilized by the Oklahoma Works one-stop centers in the assessments of WIOA participants.
- **OWDI 03-2019 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.
- **OWDI 01-2019, Change 1 Oklahoma Works One-Stop American Job Center Certification Policy:** To communicate Oklahoma's process and procedures for evaluating and certifying comprehensive and affiliate Oklahoma Works - A Proud Partner of the American Job Center Network (One-Stop) Centers.
- **OWDI 03-2021 Local Board Certification:** To provide guidance and process for the Local Workforce Development Board two-year certification process.
- **OWDI 10-2020 Regional and Local Planning Instructions:** To communicate Oklahoma's instruction for the local and regional plans under the Workforce Innovation and Opportunity Act.
- **OWDI 02-2019, Change 2 Oklahoma Data Validation and Source Documentation Requirements:** To provide guidance to 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.
- **OWDI 23-2017, Change 1 Conflict of Interest:** To provide guidance to the workforce system to ensure that WIOA Title I workforce development activities are conducted in a manner to prevent conflict of interest.
- **OWDI 09-2018 WIOA Title I Formula Programs and Job Corps Coordination:** To provide guidance 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.
- **OWDI 08-2017, Change 2 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 OKJobMatch.

- **OWDI 07-2018 Supplemental Information Collection:** To provide guidance for 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.
- **OWDI 06-2018 Effectiveness in Serving Employers:** To provide guidance for the Effectiveness in Serving Employers requirements 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.
- **OWDI 07-2020 Adult 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.
- **OWDI 16-2017, Change 1 Grievance and Complaint Process:** To communicate Oklahoma’s instructions for the grievance and complaint process under WIOA.
- **OWDI 04-2018 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.
- **OWDI 03-2018 Roles and Responsibilities:** To communicate the roles and responsibilities of various entities created as a result of the Workforce Innovation and Opportunity Act.
- **OWDI 13-2017, Change 2 Nondiscrimination EO Policy:** To communicate Oklahoma’s process and procedures regarding nondiscrimination and equal opportunity procedures.
- **OWDI 22-2017 Transitional Jobs:** To provide guidance to the workforce system on developing Transitional Jobs as a workforce strategy within the title I Adult and Dislocated Worker programs.
- **OWDI 20-2017 Oklahoma Works Branding:** To communicate Oklahoma’s common identifier, Oklahoma Works a Proud Partner of the American Job Center Network, and provide guidance on the usage of the Oklahoma Works a Proud Partner of the American Job Center Network brand as part of all external communications.
- **OWDI 18-2017 Negotiation Performance Goals:** To provide Local Workforce Boards 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.
- **OWDI 02-2016, Change 2 WIOA Title I Youth Program Guidance:** To communicate State youth policy and provide WIOA Title I youth formula program technical guidance on the activities associated with the implementation of WIOA.

- **OWDI 17-2017 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).
- **OWDI 09-2020 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, with the goal of ensuring provider performance, job-driven training, informed customer choice, continuous improvement, and cost-effective investment of public funds.
- **OWDI 11-2017 Change 1 Governor’s Oversight & Monitoring Plan:** To communicate the Governor’s instructions for developing and implementing an Oversight and Monitoring plan for recipients of federally-funded programs and grants administered by the Oklahoma Office of Workforce Development. This issuance also details the Governor’s standards for local oversight and monitoring.
- **OWDI 10-2017 Fiscal, Procurement, and Contracting Policy:** To communicate the State policy concerning fiscal requirements, procurement, and contracting.
- **OWDI 06-2017 MOU Policy:** To provide guidance for the local development and execution of Phase I of a Memorandum of Understanding (MOU) with all of the required partners.
- **OWDI 03-2017 Oklahoma Works One-Stop Operator Procurement Instructions:** To communicate Oklahoma’s guidance for the procurement and selection of the local Oklahoma works One-Stop Operator under the Workforce Innovation and Opportunity Act.
- **OWDI 02-2017 Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board:** To provide guidance for local workforce development boards intending to redesignate within a region, consolidate, and/or become a new workforce area under WIOA.
- **OWDI 07-2016, Change 1 Transfer of Formula Funds Policy:** To provide staff with specific policy, procedures, and guidelines for the transfer of funds between the Title I Adult and Dislocated Worker Programs of the Workforce Innovation and Opportunity Act.
- **OWDI 04-2016, Change 1 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.
- **OWDI 01-2016 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.
- **OWDI 07-2015 Process for Identification of Workforce Planning Regions:** To provide guidance and process for the identification of Workforce Planning Regions in Oklahoma.
- **OWDI 06-2015 Process for Existing Local Workforce Development Area Conditional Designation:** To provide guidance to current and local workforce areas that did not meet the qualifications for initial designation.

- **OWDI 04-2015 Workforce Innovation and Opportunity Act (WIOA) Youth Program:** To provide staff with guidance on the changes to expenditure requirements, eligibility and program elements under WIOA to the Title I Youth Programs. This policy defines the criteria for the design and parameters of the Title I Youth Program with emphasis on priority of service to out of school youth.
- **OWDI 02-2015 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.

State Guidelines for State-Administered One-Stop Partner Programs' Contributions to a One-Stop Delivery System

OWDI 24-2017, Change 1 provides local boards, chief elected officials and one-stop partners with guidance on determining equitable and stable methods of funding infrastructure in accordance with WIOA Sec. 121. OWDI 24-2017, Change 1 provides:

- Definitions for terms and practices commonly associated with infrastructure agreements;
- A description of the differences between one-stop operating costs specific infrastructure costs;
- A list of the required one-stop partners with agency or entity information specific to Oklahoma;
- Options for allocation methodologies;
- The required aspects of the Infrastructure Funding Agreement;
- The differences between the Local Funding Mechanism (LFM) and the State Funding Mechanism (SFM) as well as the potential impacts of using either mechanism;
- Procedures the state will follow if one or more WDAs requires the SFM including, and;
- Several tools to be used by local boards, chief elected officials, and local one-stop partners while negotiating Infrastructure Funding Agreements using the LFM.

In addition to issuing OWDI 24-2017, Change 1, OOWD held multiple meetings for one-stop partners, made staff available for meetings held in the local areas as requested, shared an ongoing document containing frequently asked questions, and held bi-weekly or weekly phone calls. As a best practice, OOWD continues to hold bi-weekly calls with local boards and one-stop partners as all parties strive to continue improving the system.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

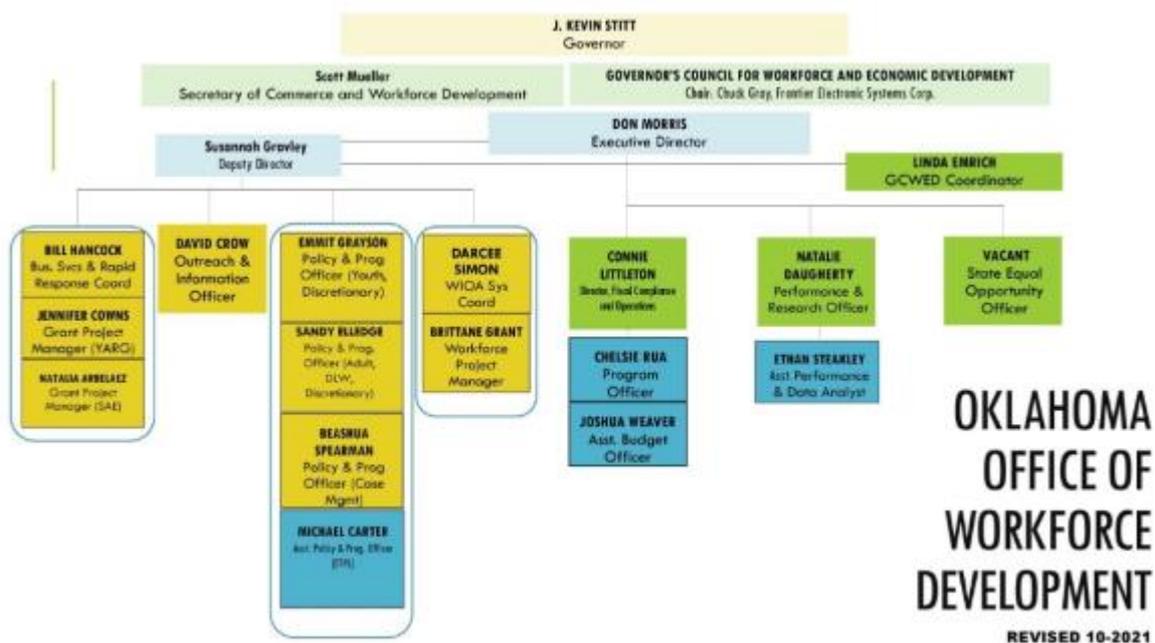
The Oklahoma Office of Workforce Development (OOWD), housed at Oklahoma Department of Commerce (ODOC), guides the workforce development system in Oklahoma. There are four core programs in Oklahoma. The OOWD/ODOC serves as the Governor's grant recipient and administrative entity for Oklahoma's WIOA Title I programs: Adult, Dislocated Worker, and Youth. They also manage various discretionary grants and National Emergency Grants (NEG) that have been awarded. Wagner-Peyser is administered by the Oklahoma Employment and Security Commission (OESC). Vocational Rehabilitation is administered by the Oklahoma Department of Rehabilitation Services (DRS), and Adult Education and Family Literacy is administered by the Oklahoma Department of Career and Technology Education (ODCTE).

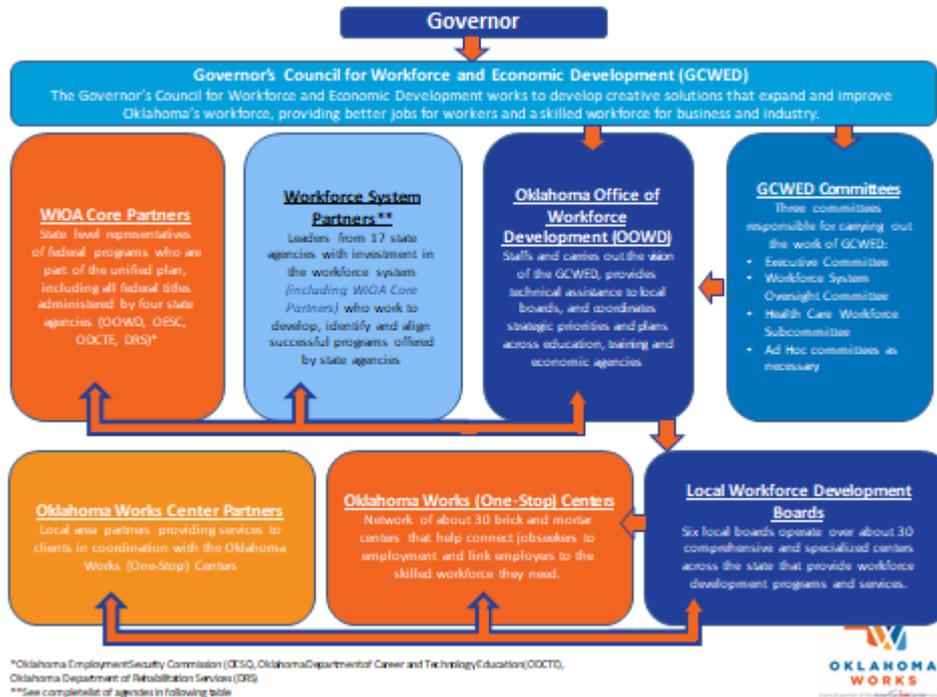
These core partners work closely together as well as with the State Workforce Development Board - referred to in Oklahoma as the Governor’s Council for Workforce and Economic Development (GCWED). The GCWED advises the Governor on workforce priorities and initiatives while also overseeing workforce activities across the state and assisting in the development and implementation of the WIOA State Plan.

The Oklahoma Office of Workforce Development provides staffing support for the Governor’s Council and its committees, provides technical assistance to four planning regions and six 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.

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

The OOWD focuses Oklahoma’s workforce development system 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 ultimate goal is a comprehensive workforce development system that is fully integrated and accountable. The OOWD facilitates the collaborative process of creating and implementing a systems approach to workforce development that serves business and creates employment opportunities for all Oklahomans.

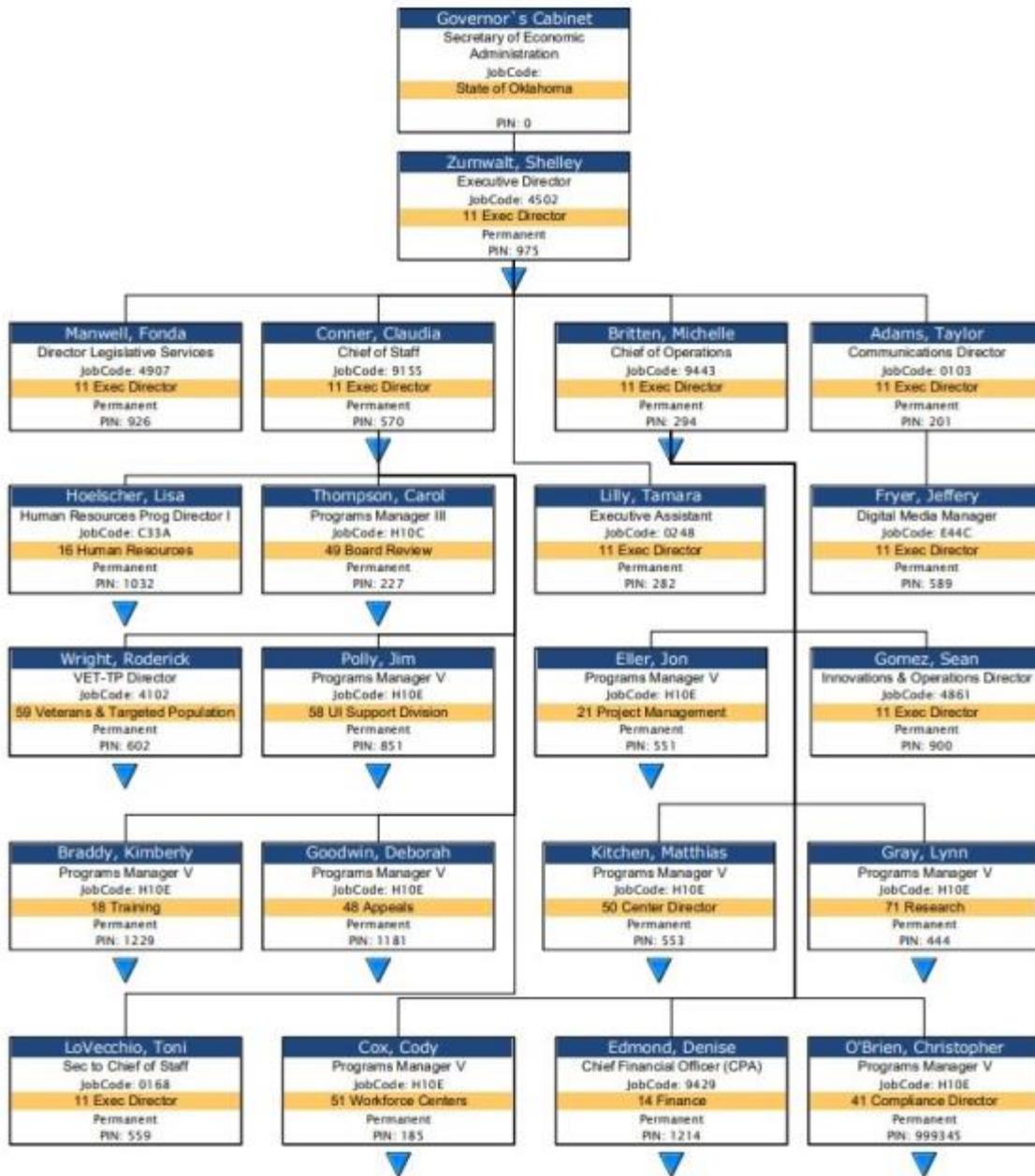




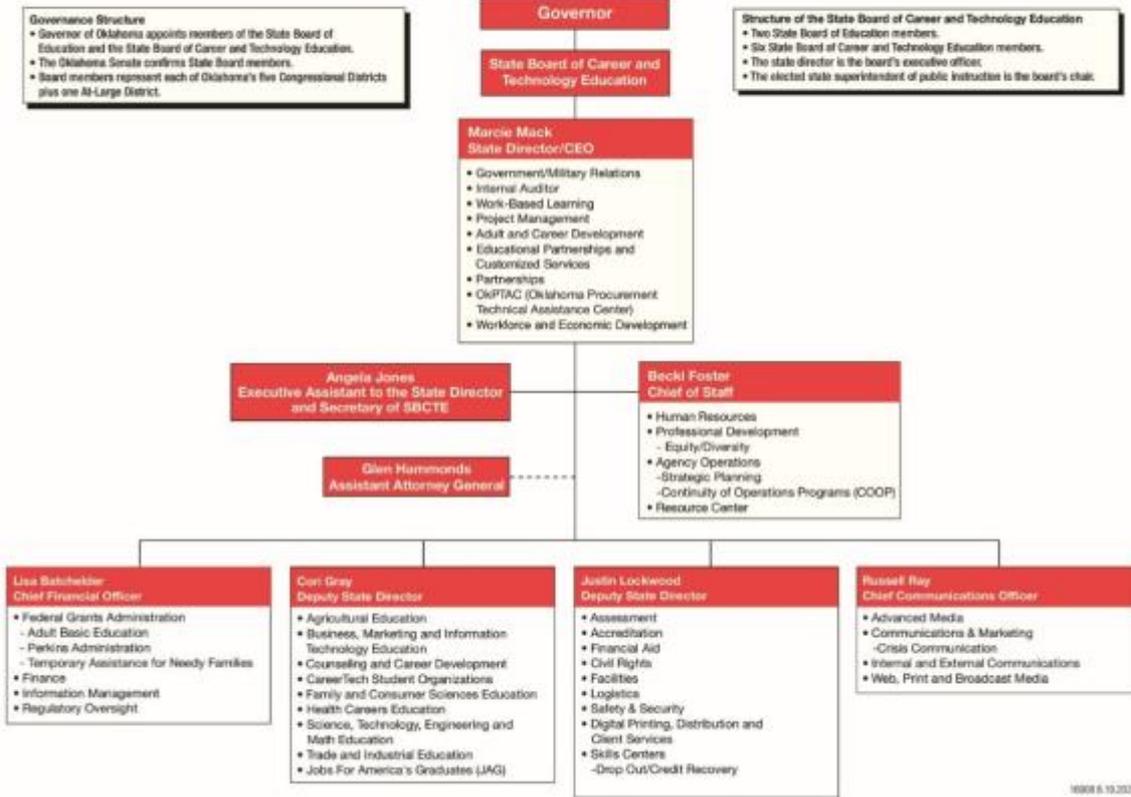
STRUCTURE / COMMITTEES

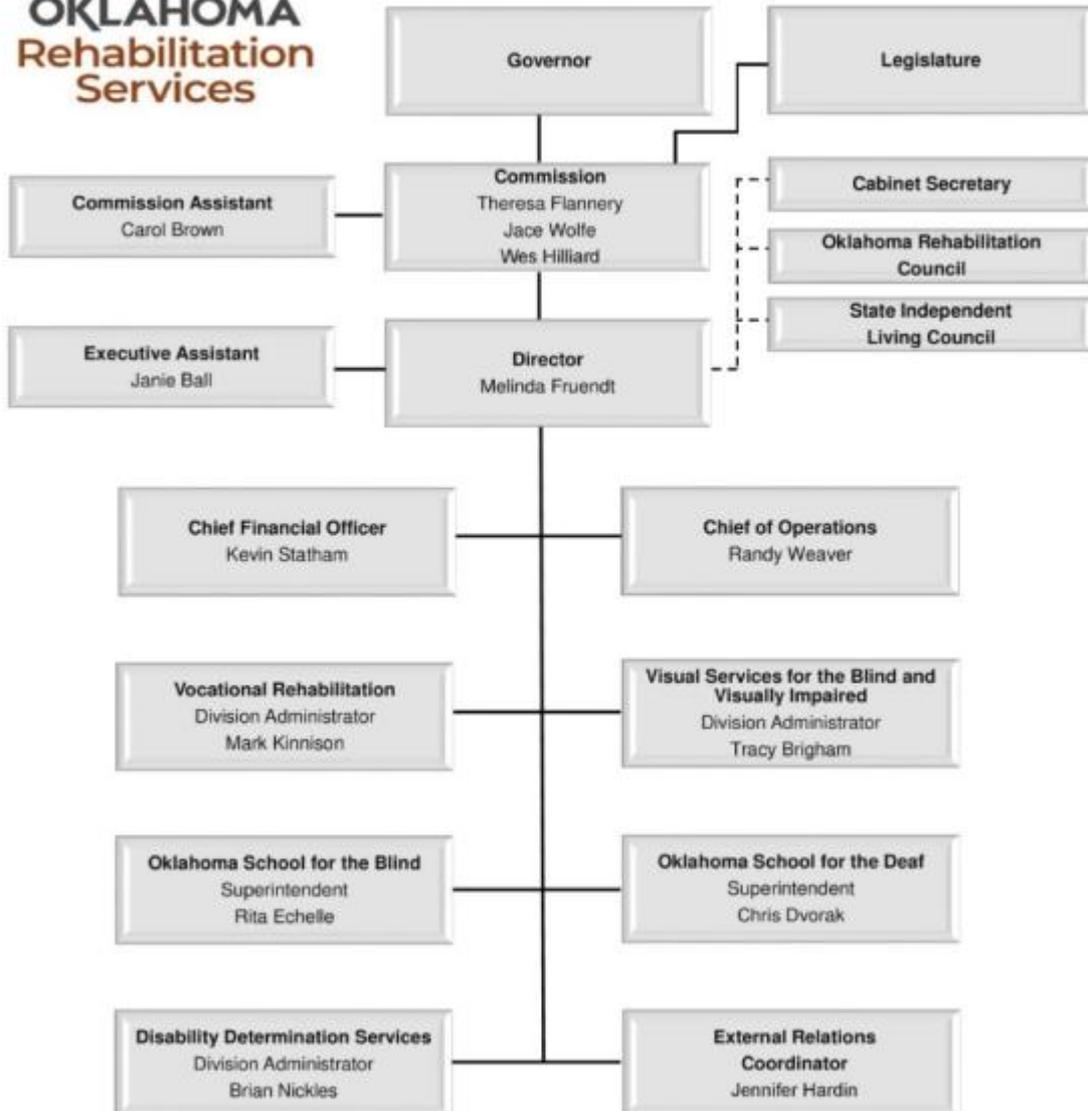


Oklahoma Employment Security Commission



OKLAHOMA DEPARTMENT OF CAREER AND TECHNOLOGY EDUCATION ORGANIZATIONAL CHART





B. STATE BOARD

Oklahoma brings together leaders from business, government, education, and non-profit sectors to jointly develop ways to coordinate workforce development with economic development. This is done through Oklahoma's State Workforce Development Board, which is called the Governor's Council for Workforce and Economic Development (GCWED). The GCWED works to

develop creative solutions that expand and improve Oklahoma's workforce, providing better jobs for workers and a skilled workforce for business and industry.

The interrelation of agencies within Oklahoma's workforce system starts with the Governor's Council for Workforce and Economic Development. The Governor's Council serves as Oklahoma's lead workforce development entity and its statewide Workforce Innovation and Opportunity Board. The Governor, in accordance with Section 101 of the Workforce Innovation and Opportunity Act, established the State Council as an advisory body to the Governor, and the body was codified by the Oklahoma Legislature in 2006 (WIA) and in 2015 (WIOA).

The Governor's Council includes private and public sector individuals from all areas of the state that work together to support the governor's economic and workforce development vision, Oklahoma Works. It is business-led with a majority of the members coming from private sector employers with optimum policymaking or hiring authority.

The Governor's Council meets quarterly; however, interaction between its members occurs on a regular basis. Initiatives that involve long-standing partnerships between private companies and public agencies are ongoing.

The governor appoints private sector representatives from Oklahoma's Industry Clusters. These Industry Clusters include high-growth, high-demand industries and occupations statewide. There are five main Industry Clusters for the state of Oklahoma: aerospace and defense; energy; agriculture and biosciences; information and financial services; and transportation and distribution.

The governor establishes terms of appointment or other conditions governing appointment or membership on the council. Members are appointed for staggered terms. Members continue to serve until a replacement is appointed by the Office of the Governor. If vacancies occur during a term of office, the Office of the Governor makes new appointments for the duration of the term. All initial terms of office start on November 1 after receiving notification by letter from the Office of the Governor specifying an explanation of the term structure.

Private and public sector representatives also serve on Governor's Council committees charged with developing and recommending initiatives to enhance and implement Oklahoma's workforce and economic development strategy. Standing committees are: Executive Committee, Workforce System Oversight Committee, and Healthcare Workforce Committee. There are several ad hoc committees including a Youth Program Committee and a Career Pathways Committee and other committees as the need arises. Recommendations are taken to the full Council for action.

Leadership

The chair (appointed by the Governor) of the Governor's Council was Nathaniel Harding, Founder and President of Antioch Energy, Oklahoma City, OK. Nathaniel served as chair from January 2017 until December 2019. In December 2019, the new governor of Oklahoma then appointed Michelle Choquette, Human Resources Director at Gateway First Bank, Jenks, OK, as chair of the Governor's Council. In January 2021, Michelle Choquette asked to step down as chair due to secular responsibilities (but remain on the Council), so the governor appointed existing Council member Chuck Gray, Vice President and COO, Frontier Electronic Systems Corp. as chair.

Another leadership change took place in February 2019. The new governor of Oklahoma appointed Sean Kouplen Secretary of Commerce and Workforce Development. The Oklahoma Office of Workforce Development came under his leadership at that time. The Governor's Council is staffed by the Oklahoma Office of Workforce Development (OOWD). In January 2021, Secretary Sean Kouplen resigned and in February 2021, Scott Mueller was appointed by the governor as Secretary of Commerce and Workforce Development.

OOWD also staffs the Executive Committee, the Workforce System Oversight Committee, the Career Pathways Ad Hoc Committee, and the Youth Programs Ad Hoc Committee. The Department of Health and OOWD staff the Healthcare Workforce Committee.

Governor's Council Standing Committees

Executive Committee

Purpose according to the Governor's Council Bylaws: The Executive Committee shall act in place of the Governor's Council only when necessary and with subsequent full board review, action, and ratification. It shall convey to the Governor recommendations posed by the Council, approve the direction of and develop the Strategic Plan, develop the areas for tasks required for committees as warranted, appoint committee composition (Council members and at-large community members) and co-chairs, respond to the needs of the Council and its members, conduct an annual review of the Executive Director, and make staff capacity recommendations.

The Executive Committee is comprised of business members of the Council, including at minimum: the Chair, Vice-Chair, and the Co-Chair (private sector representative) from each of the Council's committees, excluding those who are non-members of the Council.

Workforce System Oversight Committee

Purpose according to the Governor's Council Bylaws: Makes decisions on program governance, policy and capacity building for the Local Workforce Development Boards and partnerships. The Committee serves as an oversight board and will ensure compliance with WIOA.

Goals/Objectives:

- Certify Workforce Development Boards in compliance with the Workforce Innovation and Opportunity Act (WIOA).
- Continue designing, aligning and integrating Oklahoma's workforce/talent development and delivery system.
- Set system-wide metrics and performance expectations.
- Identify and conduct service delivery efficiency pilot projects.
- Research and identify operational and organizational strategies that will help make workforce boards stronger and service delivery better.
- Develop guidance to make the workforce system more effective and efficient.
- Development of the State Plan, and the Annual Report.
- Work with regional planning areas to develop planning documents.

Action Items:

- Coordinate and ensure support at the local and state level to the state vision.
- Through a partner supported subcommittee, provide guidance in the form of policy and technical assistance to ensure compliance to WIOA local areas and designated local planning regions, to ensure statewide metrics and required performance are met.
- Convene statewide workforce development partners and local workforce development boards and provide venues and opportunities for continued system building.
- Support and facilitation for pilot projects to provide models for the statewide system

- Plan and develop statewide summits for the Local Elected Officials and board members to continue regional planning.
- Provide guidance to assist local areas in achieving compliance.

Healthcare Workforce Committee

Purpose according to the Governor’s Council Bylaws and Oklahoma Statute: Inform, coordinate and facilitate statewide efforts to ensure that a well-trained, adequately distributed, and flexible healthcare workforce is available to meet the needs of an efficient and effective healthcare system in Oklahoma.

Goals/Objectives:

- Statewide health workforce efforts are being coordinated through a single, centralized entity.
- Labor demand and program supply for 20 critical healthcare occupations are identified and quantified through the development of a longitudinal, multi-sourced data set that is available for public use.
- Strategies are in place to reduce identified supply gaps for 20 critical health occupations.
- At least five recommended policies and programs that support and retain an optimized health workforce have been implemented

Action Items:

- Conduct data analysis and prepare reports on health workforce supply and demand;
- Research and analysis of state health professional education and training capacity;
- Recommend recruitment and retention strategies for areas determined by the Oklahoma Primary Care Office or the Oklahoma Office of Rural Health to be areas of high need; and
- Assessment of health workforce policy, evaluation of impact on Oklahoma’s health system and health outcomes, and developing health workforce policy recommendations.

I. MEMBERSHIP ROSTER

<u>COUNCIL MEMBER</u>	<u>TITLE</u>	<u>REPRESENTING</u>
Banks, Brian	Owner/CEO	Providence Home Care
Booker, Stan	Mayor	City of Lawton, OK
Boothe, Edwin	Director	Dist. Opers. Big Lots Durant DC LLC
Cameron, Stephanie Vickers	Community Relations Adm.	AAON
Choquette, Michelle	Chief HR Officer	Gateway First Bank
Curry, Jimmy	President	AFL-CIO
DeHart, Weston	President	CMS Willowbrook, Inc.
DeLozier, Dan	County Commissioner	Rogers County
Denney, Lee	Interim State Director	OK Dept. of Career & Technology

<u>COUNCIL MEMBER</u>	<u>TITLE</u>	<u>REPRESENTING</u>
		Education
Donica, Gayle	Director, Human Resources	Noble Research Institute
Fruendt, Melinda	Executive Director	OK Dept. of Rehabilitation Services
Gray, Chuck* Chair	Vice President & COO	Frontier Electronic Systems Corp.
Hager, Geoffrey	CEO	Big Elk Energy Systems
Hayworth, Scott	Site Director	Dell EMC
Hays, Dee	President & CEO	Excellence Engineering, LLC
Hodgen, Gregory	President & CEO	Groendyke Transport, Inc.
Huggins, Teresa	CEO	Stigler Health and Wellness Center, Inc.
Kenxrix, Gerrid	Representative	Oklahoma State House of Representatives
Leewright, James	Senator	Oklahoma State Senate
Mariska, Chad	Chairman, President & CEO	APS FireCo
McCool, Jesse	CEO	Wheeler Labs, LLC
McDugle, Kevin	Representative	Oklahoma State House of Representatives
Morey, Jenna	Executive Director	ReMerge of Oklahoma County
Moseley, Traci	Senior Mgr. Workforce Staffing	Amazon
Mueller, Scott	Cabinet Secretary	OK Dept. of Commerce & Workforce Dev.
O'Donnell, Tommy	Training Director	Plumbers & Pipefitters Training Center
Pugh, Adam	Senator	Oklahoma State Senate
Robinson, Ben	Cabinet Secretary	Veterans Affairs & Military
Seals, Riley	Sr. Dir. Of Distribution	Dollar General Corp.
Shepelwich, Steven	Sr. Community Affairs Adv.	Federal Reserve Bank of KC-OKC Branch
Simmons, Jodi	Chief Nursing Officer	Hillcrest Medical Center
Stewart, David	Administrator	MidAmerica Industrial Park
Thomas, Jason	Mgr., Human Resources	Boeing Company
Thompson, Valerie	Director	Urban League of Greater

<u>COUNCIL MEMBER</u>	<u>TITLE</u>	<u>REPRESENTING</u>
		Oklahoma City
Wilcox, Dewayne	Bus. Manager/Fin. Sec.	IBEW Local 1141
Williams, Martin	Owner/Manager	Williams Farms
Zumwalt, Shelley	Executive Director	OK Employment Security Commission

II. BOARD ACTIVITIES

Oklahoma brings together leaders from business, government, education, and non-profit sectors to jointly develop ways to coordinate workforce development with economic development.

The Governor's Council for Workforce and Economic Development works to develop creative solutions that expand and improve Oklahoma's workforce, providing better jobs for workers and a skilled workforce for business and industry.

The Governor's Council operates in accordance with the functions contained in Section 101(d) of the WIOA to oversee Oklahoma's workforce development system. The Governor's Council advises the governor on the creation, implementation, and continuous improvement of a comprehensive statewide workforce development system in support of economic development.

The Governor's Council assists the governor in the preparation of the state plan by assigning staff from various entities represented on the council to collaborate on the initiatives included and the writing of the plan.

The Governor's Council develops linkages through its members and workforce system partners. This regular contact among the partners allows for constant collaboration on issues.

The Governor's Council Workforce System and Oversight Committee will review local and regional plans submitted from each of Oklahoma's workforce development areas and regions. This review ensures that the local and regional plans align with the state plan and that these plans are demand driven with significant input from identified local industry representatives. The council provides technical assistance to local areas and regions in the development of their plans, if needed.

The Governor's Council also recommends designations of local workforce development areas and will continue to work with local workforce areas on re-designation requests. Any contemplated changes in areas are discussed with all parties involved including the local elected officials, WDBs, and service providers. Changes in workforce development areas are done only in the best interests of the State and the business and job seeker customers in that area.

The Council is responsible for certifying Local Workforce Boards. The certification process is the key strategy to ensure Local Workforce Development Boards have the proper membership and structure to be highly effective in creating and continuously improving an aligned workforce development system, overseeing funds effectively and achieving established performance measures.

As also described in the Plan, the Governor's Council was instrumental in making recommendations regarding the assignment of local workforce areas to regions. This process was an open process including input from local boards, local elected officials and stakeholders prior to the creation of the four Oklahoma Regional Workforce Planning Regions.

Allocation formulas for the distribution of funds for adult, dislocated worker and youth programs under WIOA are developed as per the federal WIOA law.

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

A. ASSESSMENT OF CORE PROGRAMS

The state's assessment of the core programs begins with quarterly analysis of performance measures and the state's progress toward meeting the negotiated levels. Quarterly analysis of current data, provided through the state's case management system, allows the state to monitor progress and identify areas strengths and weaknesses as early as possible. Quarterly analysis is provided to the local areas as well. Sharing this data regularly ensures local areas and the state to simultaneously review and assess current and projected performance.

Analysis of the raw data leads to assessment of the current priorities and initiatives at the local, regional, and state level. With the data collection the state is able to assess the progress of the partners and programs in meeting the state's vision and goals. Local areas and Planning regions are expected to assess their vision and goals as well adjusting their focus if necessary.

Regular monitoring of the core programs is conducted at least annually by the state. Regular monitoring also falls under the responsibilities of local workforce development boards. Monitoring conducted by the core programs of their locally delivered services will ensure alignment of services, coordination of partner services and advancement toward meeting and exceeding the negotiated performance measures. Completion of the annual performance narratives brings the program assessments together, summarizing the workforce system assessment throughout each program year.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

Oklahoma's core partner programs have made progress in their ability to share data with one another. This progress is crucial to the assessment of the one-stop delivery system, but access to live data continues to be a barrier for the state's workforce system.

Assessment of the one-stop delivery system and partner program services begins at the local level through the coordination of partners, as documented through each local area's Memorandum of Understanding (MOU). The MOUs are reviewed by the state, and through a collaborative effort, strengths and weaknesses are identified.

The state is shifting focus to cooperative resolution and those efforts of cooperation include one-stop system partner programs at the state, regional, and local level. Specifics of the process are still in process, and changes take into consideration the shifts in operations experienced during the 2020 and 2021 calendar years.

C. PREVIOUS ASSESSMENT RESULTS

In PY18 and PY19, Oklahoma met or exceeded performance levels for which there were negotiated targets across all four titles and core programs.

Assessments completed over this two year period, were used to determine whether or not a state agency, or local workforce development was in need of technical assistance, implemented best practices, or should be considered for a corrective action plan with respect to their performance levels. State leaders utilized each program's performance to identify areas where alignment across the workforce system may be helpful, especially ensuring each programs services are available to each Oklahoman in need.

Initial assessments of PY20 and active monitoring of PY21 show that Oklahoma met, will meet, or exceeded, will exceed, performance levels for which there were negotiated targets across all four titles and core programs.

Assessments completed during this two year period were used in the same ways as the PY18/PY19 period. Active assessments use information derived from the state's various data systems to analyze past and projected performance at the state and local levels. Performance

and program assessments influence statewide strategies, across all four core programs, for continuous improvement aiming to develop effective and efficient strategies which assist in the successful outcomes of our participants.

Oklahoma strives to make decisions about the success and strategy of core programs using the data available to each partner. There have been staffing changes across the workforce system, enabling the state agencies administering programs to more effectively analyze and communicate with each of the core programs and with the Governor's Council for Workforce and Economic Development. Strategies such as monthly performance review meetings, quarterly/bi-annual collaboration calls, increased presentations, and more frequent access to real time data, provide key decision makers with the information needed to adjust or change the direction of strategies at the state and local levels.

D. EVALUATION

Under the authority of the GCWED, OOWD will conduct research and evaluation projects in conjunction with representatives of WIOA partners, local workforce development boards, service providers, program participants, impacted advocacy and interest groups, as well as the public. Rigorous, academic-based methodologies will be applied using, as appropriate, current and historical programmatic data, formal literature reviews of existing research on pertinent topics, and information gathered through research tools such as surveys, focus groups, interviews, and meetings. Findings will be shared with appropriate DOL representatives, partners, research participants and, if appropriate, the public via OOWD's website.

In late 2019 and early 2020, Oklahoma participated in the USDOL Evaluation Peer Learning Cohort (EvalPLC). Oklahoma's State team was comprised of cross-agency representatives who represent core WIOA programs. Oklahoma completed Evaluation Readiness Assessment and developed an Evaluation Action Plan.

OOWD is developing an Evaluation Portfolio as a result from the Evaluation Action Plan. An Evaluation Portfolio is a collection of existing research on various workforce topics. The research team has collected over 35 research articles that study a population in Oklahoma. Topics include, but not limited to, apprenticeship programs, re-entry populations, low-income individuals, and individuals with disabilities. OOWD plans on writing a literature review based on the research articles in the Evaluation Portfolio.

OOWD performs a pre-post evaluation on Title I participants included in the Median Earnings 2nd Quarter after Exit performance indicator. The evaluation examines the earnings of participants before program participation to the earnings after participation to see if wages have increased after receiving WIOA services.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

A. FOR TITLE I PROGRAMS

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), OOWD 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 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 States 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 States Census Bureau as provided by the United States Department of Labor Employment & Training Administration.

- **Excess Youth Poverty – 15%**

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 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 States Census Bureau.

- **Excess State Unemployment – 15%**

Excess State Unemployment is the number of unemployed individuals over the unemployment rate for the state during the same 12 month period. Oklahoma uses county level data to determine excess state unemployment in Oklahoma.

The number of unemployed individuals in excess of the state's unemployment rate for the same 12 month period is divided by the total number of excess state unemployed individuals calculating the appropriate dollar amount each county is to receive. A county that does not have an excess of unemployed individuals over the state's unemployment rate does not receive funding for this formula factor.

Data Source: Data used to calculate ASUs is sourced by the United States 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 ensure 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's 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)

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 Adult 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 NOA, OOWD 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 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 States 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 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 States Census Bureau as provided by the United States Department of Labor Employment & Training Administration.

- **Excess Adult Poverty – 15%**

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 States Census Bureau.

- **Excess State Unemployment – 15%**

Excess State Unemployment is the number of unemployed individuals over the unemployment rate for the state during the same 12 month period. Oklahoma uses county level data to determine excess state unemployment in Oklahoma.

The number of unemployed individuals in excess of the state's unemployment rate for the same 12 month period is divided by the total number of excess state unemployed individuals calculating the appropriate dollar amount each county is to receive. A county that does not have an excess of unemployed individuals over the state's unemployment rate does not receive funding for this formula factor.

Data Source: Data used to calculate ASUs is sourced by the United States Census

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 ensure 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'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

In accordance with 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 OOWD 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 values 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 a 12-month period 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 a 12-month period in each county is divided by the total average number of unemployment claims filed over a 12-month period 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 in relation to 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 in relation to 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 experience 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 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 ensure 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.

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 in relation to the period of time for which the data is analyzed.

B. FOR TITLE II

I. DESCRIBE HOW THE ELIGIBLE AGENCY WILL AWARD MULTI-YEAR GRANTS OR CONTRACTS ON A COMPETITIVE BASIS TO ELIGIBLE PROVIDERS IN THE STATE, INCLUDING HOW ELIGIBLE AGENCIES WILL ESTABLISH THAT ELIGIBLE PROVIDERS ARE ORGANIZATIONS OF DEMONSTRATED EFFECTIVENESS

Oklahoma has grouped each of its 77 counties into four Oklahoma WIOA regions. These four Oklahoma WIOA regions are further divided into a total of seven Workforce Development Areas. The Oklahoma Department of Career and Technology Education (ODCTE) will group these 77 counties into Adult Basic Education (ABE) Service Areas to align with the seven workforce development areas.

ODCTE staff will determine an allocation amount for each ABE service area by using demographic data for each of Oklahoma's 77 counties. This allocation for each ABE Service Area will include the number of eligible individuals within a service area. This will include eligible individuals 18-24 years of age and eligible individuals 25+ years of age that do not have a high school diploma or its recognized equivalent. A formula will then be determined using these variables to determine an allocation amount for each county. The amount for each county within an ABE service area will be totaled, and eligible providers will compete for up to this amount in their application. Multiple service providers may be selected within an ABE Service Area based on funding requested on dollars available. Eligible providers will determine a budget for providing services in the service area(s) requested and the ODCTE will evaluate these budgets. Eligible provider means an organization that has demonstrated effectiveness in providing adult education and literacy activities. This may include a local educational agency, a community-based organization or faith-based organization, a volunteer literacy organization, an institution of higher education, a public or private nonprofit agency, a library, a public housing authority, a nonprofit institution that has the ability to provide adult education and literacy activities to eligible individuals. 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. A committee made up of Adult Basic Education personnel at the ODCTE will review these factors and based on this information and money available for each workforce area, determine the award amounts for each eligible provider receiving a grant. The ODCTE may decide to re-grant all or portions of 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 in the service

area. Priority will be given to those areas in the same region of where the unrequested funds came from.

The amount received by eligible recipients will be held steady for not more than three years. After this period allocation amounts for each service provider will be determined using a formula that accounts for the eligible individuals in an ABE service area, performance of the service provider, and provider need.

In November 2021 the Oklahoma Department of Career and Technology Education will begin a competition to award funds in a multi-year competition for Adult Basic Education grants, IELCE grants, and Corrections Education grants. The applications will be due January 31, 2022. Eligible agencies will have the option of being able to apply for one or more of these grants. Eligible agencies have the option of applying for one or more service areas in the Adult Basic Education grant. Agencies also have the option to apply for an IELCE grant and/or a Corrections Education grant. One RFP will be utilized in this process for all three grants. The same grant application and process will be used by all eligible applicants.

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.

In order 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, English language acquisition, and other subject areas relevant to the services contained in the State's application for funds. 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 services 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 2022-2023, 2023-2024, 2024-2025, and 2025-2026.

Distribution of funds for Integrated English Literacy and Civics Education and Corrections Education grants

The ODCTE will fund Integrated English Literacy and Civics Education (IELCE) in conjunction with Integrated Education and Training activities. Components funded within this program are adult education and literacy activities, workforce preparation activities, and workforce training. Eligible recipients will have the opportunity to apply for IELCE and Corrections Education grants. The award may be based on multiple factors including the budget request of the recipient, the quality of the provider application, and the pre-award risk assessment. Recipients will receive a hold steady amount of not more than three years. After this period allocation amounts will be determined through a formula that includes a base amount for each recipient, the performance of the recipient after two years of providing the service, and provider need. An eligible recipient for either the IELCE or the Corrections Education grants do not have to be a recipient of the Adult Basic Education grant. Service areas of both IELCE and Corrections Education grants may not mirror that of the ABE service areas.

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 Basic Education Grant, IELCE Grant, and Corrections Education Grant directly to the Oklahoma Department of Career and Technology Education. ODCTE will ensure that all parties potentially interested in the grant shall have direct and equitable access to apply for the grant. Notification of the RFP will first take place on the ODCTE website. Core WIOA partners and one-stop partners will also be notified at the same time as the RFP is published on the website. The application will be available as a Microsoft Word document that can be downloaded from the ODCTE website. The completed application will be emailed to the ODCTE Adult Basic Education Division. Upon receiving the application, the Oklahoma State ABE Director will send a notification within 24 hours to the applicant that the ODCTE has received the application. Each applicant will fill out the same application and submit their application through the same means. This will ensure direct and equitable access to all eligible providers.

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. The entire review panel will review and score each application ensuring an equitable review process.

C. VOCATIONAL REHABILITATION PROGRAM

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

These estimates per year are for FFY 2020 and FFY 2021.

Title I, Part B, Priority Group 1 — Estimated Funds = 10,890,738 (Average Cost of Services = 2,536)

Title I, Part B, Priority Group 2 — Estimated Funds = 12,486,051 (Average Cost of Services = 2,536)

Title I, Part B, Priority Group 3 — Estimated Funds = 1,623,415 (Average Cost of Services = 2,536)

Title VI, Part B — Estimated Funds = 300,000 (Average Cost of Services = 4,166)

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Currently, two partners under WIOA operate the same case management/reporting system for their respective programs. Labor Exchange and Title I programs have utilized an integrated case management/reporting system for many years. This system uses real time data across programs to prevent duplication of services, track program services and calculate integrated performance data.

All of the partners have a computerized case management system that meets the specific requirements of each program. During Program Year 2019, Oklahoma made strides in developing more integrated information access that links data across core programs through a RSI-DWG. The Department of Vocational Rehabilitation Services (DRS) and Oklahoma Department of Career Technology (CareerTech) worked with OESC and OOWD to develop a process for flat file transfer of data to identify participants who are co-enrolled. While each core partner continues to use their existing systems to gather needed information for required for evaluation and performance reporting, transferring data between partner systems will improve data collection and dissemination and create better integrated case management and reporting across core programs.

Additionally, the Oklahoma Employment Security Commission (OESC), through data sharing MOUs, provides the required wage information for federal reporting purposes in compliance with applicable federal and state laws.

Oklahoma is committed to the goals of eliminating duplication of services and addressing the needs of common intake and case management. The core partners are working to increase the exchange of data to the maximum extent possible. Data sharing MOUs address the use of wage record data in order to successfully comply with WIOA performance accountability measures and state indicators of performance.

Oklahoma is exploring software solutions, such as Application Programming Interfaces (APIs), to assist with data sharing across Management Information Systems used by core partners.

Oklahoma is dedicated to developing a roadmap toward greater data alignment and integration of participant and performance data across core programs with the ultimate goal of providing effective and efficient services that leads to the participants' credential attainment and employment. The development and implementation of a data system that will allow the sharing of participant information and services across core programs will make benchmarking a reality.

Under the current Governor's administration, technology modernization is a priority. Over the past few years, Oklahoma has worked with the State Regents for Higher Education, the State Department of Education, the Oklahoma Department of Career and Technology Education, the Oklahoma Employment Security Commission, the Department of Rehabilitation Services, and the Oklahoma Office of Management and Enterprise Services to develop plans for data connectivity. We intend to use the Governor's interest in data and technology infrastructure to move this work forward. Effective collection and utilization of education, workforce, and economic data is essential to Oklahoma's ability to decrease the gap between labor supply and demand, and to generate wealth for all Oklahomans.

Representatives from all WIOA core programs, Title I, Adult Basic Education, Department of Rehabilitation Services, and The Oklahoma Employment Security Commission, have all participated in workgroups, with representatives meeting with State Board staff either collectively or program to program. To date, the workgroup has done all of the following:

- exchanged information about common data elements that support assessment and evaluation
- exchanged information about data systems in-use and extant performance reporting processes
- shared information on WIOA performance metrics, reporting requirements, regulations, and guidelines

State agencies work with the Governor’s Council for Workforce and Economic Development to ensure required reports for the performance accountability are completed to the best of the state’s ability. The WIOA Data Group consists of representatives from each core partner. The representatives ensure compliance of WIOA section 116 (D) (2) is maintained and develop processes as necessary. The WIOA Data Group shares performance reports with the Governor’s Council for Workforce and Economic Development.

OESC and OOWD

OESC and OOWD programs utilize America’s Job Link Alliance - Technical Support (AJLA- TS) which provides Oklahoma with a vendor hosted management information system, OKJobMatch.

OKJobmatch houses data collecting applications JobLink, ServiceLink, ProviderLink, FiscalLink, and ReportLink. Each data collection application is compliant with WIOA Section 116 which requires the establishment and operation of a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education.

OKJobMatch’s JobLink is 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.

OKJobMatch’s ServiceLink is 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 a standardized process for following participants through the workforce development system network. It fully supports all state and federal program, grant, and reporting requirements.

OKJobMatch’s ProviderLink 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.

OKJobMatch’s FiscalLink provides an integrated fiscal management system to provide a real-time fiscal system for one-stop case management. Allowing participant and vendor financial management, accruals, payments, and fiscal reports. The State is increasingly utilizing this information to determine costs for services and returns on investment for the public workforce system.

OKJobMatch’s ReportLink is a web-based, comprehensive workforce program data management system that allows OOWD the ability to validate data and resolve and identified errors prior to submitting quarterly and annual performance reports to the Department of Labor (DOL). ReportLink is updated as needed to implement new edit checks and logic rules development by the Departments.

OOWD (Title I) works with AJLA-TS to ensure that data is collected in accordance with WIOA Section 116 and The Participant Information Record Layout (PIRL) established by the Secretaries of Labor and Education. AJLA-TS provides OOWD the appropriate PIRL files for WIOA Title I Adult, Dislocated Worker, Youth, and Discretionary Grants. OOWD (Title I) utilizes ReportLink to verify the data and verify any errors present within the data, once errors are corrected and data is verified the files are then uploaded and submitted to the Department of Labor.

ODCTE

Adult Basic Education at the Oklahoma Department of Career & Technical Education (ODCTE) 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 data specialist to easily set baselines, track program progress, student goals, and 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

The core workforce partners will utilize the WIOA Performance Measures for the Core Programs to monitor and improve all WIOA core programs. These performance measures include Employment (Second Quarter and Fourth Quarter after Exit), Median Earnings, Credential Attainment Rate, and Measurable Skill Gains. Performance for each of these measures will be segmented by Adults, Dislocated Workers, Youth, Adult Education, Wagner-Peyser, and Vocational Rehabilitation. State and local workforce boards will utilize these performance measures in measuring the progress of the core partners in their area. These measures will assist Oklahoma in determining the effectiveness of its workforce development system and allow the state to continuously improve this system. Effectiveness in Serving Employers is also tracked at the state level. Information from core partners are entered into OKJobMatch, and the type of services provided to employers are tracked.

The state will use the Eligible Training Provider (ETP) system to monitor the completion and employment rate of all participants receiving training services through the workforce system. The ability to review educational programs to ensure that participants are becoming employed in the occupations in which they are trained will assist both the educational system and the workforce system in determining the effectiveness of the training programs being developed and offered in our state. Programs eligible to receive workforce funding for the training of participants will be reviewed on a bi-annual basis and the programs not meeting performance levels set by the state will be removed.

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

Oklahoma has used Unemployment Insurance (UI) wage records for many years for performance accountability and for labor market information. Currently, wage records are used to calculate performance measures for Title I, Title II, Title III and Title IV programs as prescribed in WIOA.

Title I receives UI wage records through data sharing agreements with the Oklahoma Employment Security Commission (OESC). Wage records are utilized to verify participant data for Title I core performance measures as well as internal analysis of training institutions, programmatic priorities, and strategic planning.

Title II utilizes UI wage records to verify participant data two quarters and four quarter after exit and while calculating median wage earnings. This information is received through data sharing agreements with other core partners.

Title III, administered by the OESC, uses UI wage records for core performance and internal analysis.

Title IV reports to the Rehabilitation Services Administration on the Case Service Report (RSA-911), in compliance with the reporting requirements in Section 116 of WIOA and its regulations. Vocational Rehabilitation utilizes Direct UI wage match data to verify participant outcomes for the purposes of calculating levels of performance for the following 3 WIOA common performance measures for core programs:

1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program.

D. PRIVACY SAFEGUARDS

Data security and privacy is key to ensuring Oklahoma statewide core partner operations are available as authorized to share vital data that is necessary for WIOA and Oklahoma Works partner activities.

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 IS 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 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 OKJobMatch and ServiceLink, have implemented state level security measures. These include limiting and logging physical access to database servers, 128byte encryption, SSL and individual password protection to guard against unauthorized access as mandated by state laws and guidelines enforced by OMES IS.

7. PRIORITY OF SERVICE FOR VETERANS

In Oklahoma, covered persons are identified at various points of entry into Oklahoma's workforce development system. All customers, identified as a covered person, receive priority of services. Through an assessment process, using a state provided military registration checklist designed to determine significant barriers to employment, eligible veterans and eligible persons in Oklahoma are referred appropriately. Eligible veteran customers and other covered persons at Oklahoma Works Centers determined to have significant barriers to employment or designated as eligible by the U.S. Department of Labor are referred for services to a Disabled Veterans Outreach Program Specialist (DVOP) when and where available. Those veterans served at Centers lacking an assigned DVOP, or if the DVOP is not available, are referred to other Center staff for services. Centers are also required to have a flowchart describing the process for veteran customers being served and how a significant barrier to employment is determined and if found eligible, when the veteran is referred to the DVOP for services. When veterans are registered in OKJobMatch, the state labor exchange system, Center staff are able to identify those significant barriers to employment for referral to DVOPs.

All Center staff and system partners delivering labor exchange services through OKJobMatch are required to provide veterans and other covered persons with priority of service. Close monitoring through system reports, field visits, and training is conducted to ensure legislative requirements for veterans are followed. Additionally, all Local Workforce Development Boards (LWDBs) are required by state policy OETI-25-2009 (Oklahoma Employment and Training Issuance) to ensure that priority of service is applied throughout their respective service delivery systems, including service delivery points maintained by all sub-recipients. The State priority of service policy and procedure obligates LWDBs to monitor local service delivery operations to ensure that their internal policies and procedures result in compliance with the priority of service requirements. Furthermore, OETI-25-2009 requires LWDBs to have policy and procedure in place for priority of service for veterans in their area.

All workforce development areas follow TEGl 10-09 and TEGl 19-16 regarding Priority of Service for Veterans. Oklahoma's Adult and Dislocated Worker Policy, OWDI 19-2017 provides guidance for the Priority of Services for Veterans and Eligible Spouses in accordance with TEGl 19-16.

In addition, Oklahoma continues to build relationships with system partners focused on improving our service delivery to Veterans. A special committee, OKMilitaryConnection, was formed consisting of cross agency members from OOWD, OESC, ODCTE, Oklahoma Department of Veterans Affairs, and the Oklahoma National Guard, who worked on various efforts to coordinate services and to plan hiring events for returning military personnel and their families. In support of this effort, OOWD launched a website (OKmilitaryconnection.com) to connect veterans and covered persons with these events by pre-registering them and matching them to participating employers at many of these events.

In order to expand priority of service, the State is also working with employer councils, trade associations, the State Chamber, local chambers, state and federal agencies and education/training providers to connect transitioning service members, veterans and other eligible persons with quality training and employment. Efforts are also underway with Oklahoma's ODCTE technology centers, community colleges, and four-year institutions to develop fast-track credentialing and degree programs that offer credit for experience gained during military service.

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

Oklahoma continues to focus on accessibility for both job-seekers and business customers at all levels of the Oklahoma Works system. Working with the Governor's Council for Workforce and

Economic Development (GCWED), system partners bring sharper focus on developing and employing more Oklahomans with disabilities. The objective is to provide equitable services to individuals with disabilities and to ensure that all Workforce System partners comply with the Americans with Disabilities Act (ADA).

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 system. 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 or virtually.

To help build a foundation for the Access for All initiative, the Oklahoma Department of Rehabilitation Services (OKDRS) and Oklahoma ABLE Tech (OKABT), partner to provide regional Access for All technical assistance in the form of academies, webinars, newsletters, and weekly tips statewide. To operationalize the Access for All initiative, a task force has been developing a five-star evaluation model with supporting resources to be used for self-assessment and continuous improvement of the accessibility of the workforce system in the areas of Customer Service, Outreach, Physical Accessibility, and Training (with programmatic accessibility embedded throughout the framework). The tool will be accompanied by a system policy and a curated catalog of resources that can be tracked for enhanced professional development. Additionally, OOWD working in conjunction partners has procured a learning management system to facilitate instruction and outreach with curated material identified and developed with partners.

OOWD works to develop and support increased employment opportunities for individuals with disabilities. As part of the service and support to individuals with disabilities, Oklahoma Works Center locations provide assistance and auxiliary aids and services to individuals with disabilities. Additionally, Oklahoma Works Center staff routinely refer individuals with disabilities to the OKDRS for more intensive training and job placement opportunities when appropriate. OKDRS has six certified Social Security Administration (SSA) Work Incentive Counselors working and collocated within Workforce Centers and another three rotating between the remainder of the Workforce Centers and OKDRS offices. Workforce Center staff and OKDRS Benefits Planners collaborate to assist job seekers receiving SSA benefits. When referred by center staff, an OKDRS Benefits Planner will explain the importance of working at the highest possible level and above SSA's Substantial Gainful Activity benchmark. Oklahoma Works Center locations provide community outreach to source and identify community needs.

Individuals requiring or requesting alternate formats due to visual impairment or blindness are provided alternate formats as part the service and client experience. Auxiliary aids and services is also available to those deaf or hard of hearing populations. This information is communicated in published material including TTY information along with language communicating "equal opportunity employer/program and that auxiliary aids and services are available upon request. Partnering with AbleTech, Oklahoma Works Centers access the expertise of electronic accessibility staff. Oklahoma Works Centers provide integrated settings to provide service and accommodate all clients. Program areas are monitored yearly for nondiscrimination and equal opportunity.

Oklahoma Adult Education Program – Serving Individuals with Disabilities

Adults with disabilities are served regardless of the nature of the disability: individuals with physical disabilities and individuals with learning disabilities. Strategies for adults with physical

disabilities include ensuring that classroom sites are accessible and that reasonable and appropriate accommodations are made for the individual's disability. Adult secondary students who may need accommodations in adult basic education classes or on the high school equivalency test will be referred to OKDRS, psychologists, or other resources to obtain the required documentation of a learning disability.

Adults with learning disabilities usually possess an information processing dysfunction which interferes with their ability to acquire, remember, and/or retrieve information. Strategies for adults with both learning and physical disabilities include, training for adult education teachers on teaching adults with learning and other disabilities.

Business and Employer Outreach

OOWD partners with OKDRS to utilize 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. The OKDRS ADA Coordinator provides training in various aspects of the Americans with Disability Act and the 2010 ADA Standards for Accessible Design to staff and supervisors of these entities as well. These services are available in order to advance the promotion of equal access for individuals with disabilities in programs, services, and buildings statewide.

OKDRS delivers assistive technology for job seekers in their journey to employment. Assistive technology specialists complete a variety of assistive technology assessments and evaluations for job seekers, business work sites, and system partners. Evaluations include home modifications, vehicle modifications, personal mobility needs, computer access, worksite modifications, activities of daily living, communication school accommodations, and accessibility reviews. Assistive technology specialists focus on the reported obstacle, rather than the disability diagnosis. A big part of an assistive technology evaluation is to identify what the real problem or obstacle is for the individual job seeker or business work site.

One-Stop System Certification Policy Standards for Accessibility

The one-stop system standards and certification criteria policy are designed to integrate physical and programmatic accessibility into the benchmark criteria for center certification. The process for certification of comprehensive and affiliate American Job Centers was revised (OWDI #01-2019) through a collaboration of system partners and local areas as a task force of the Systems Oversight Subcommittee. Certification criteria were aligned to the categories of Customer Focus, Operations and Infrastructure, Equal Opportunity and Accessibility, Personnel, and Continuous Improvement. The Equal Opportunity and Accessibility category includes 8 must-meet criteria items and 3 scored criteria.

Prior to center certification approval, physical and technology accessibility is reviewed at each Oklahoma Works (One-Stop) center by Certification Teams. The Certification Teams are selected by the LWDBs and are responsible for conducting independent and objective evaluations of one-stop sites and making center certification recommendations to LWDBs. When issues related to physical and programmatic accessibility are identified, an Equally Effective Alternative Access Plan (EEAAP) is created. These plans are designed to function as corrective action plans, which are designed to be monitored regularly and updated by local Equal Opportunity Officers and/or relevant program staff.

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

The one-stop delivery system will meet the needs of English Language Learners through a variety of methods.

OOWD 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). 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) in order to effectively inform or enable those customers to participate in departmental programs or activities. OOWD Limited English Language Proficiency Policy (OWDI 17- 2017) requires LWDBs to take reasonable steps to ensure that LEP individuals have meaningful access to their program and activities. Reasonable steps (29 CFR Section 38.9(b)(1)) may include, but are not limited to, the following:

1. Conducting an assessment of an LEP individual to determine their language assistance needs.
2. Providing oral interpretation or written translation of both hard-copy and electronic materials, in the appropriate non-English languages, to LEP individuals
3. Conducting outreach to LEP communities to improve service delivery in needed languages.

LWDBs must ensure that above all, these services are free of charge and provided in a timely manner. An LEP individual must be given adequate notice about the existence of interpretation and translation services and that they are available free of charge. For LEP individuals who enter an Oklahoma Works (One-Stop) Center, language assistance services must be timely, and with adequate notice, where feasible. Language assistance will be considered timely when it is provided at a place and time that ensures equal access and avoids the delay or denial of any aid, benefit, service, or training. When a LWDB determines a significant proportion of the population eligible to be served are more likely to be directly affected by a program/activity needs information in a single language other than English, the LWDB must translate its written vital program materials into that language and provide effective oral interpretation services to members of the significant LEP group. The State can also provide oral interpreters for LEP customers who are not part of a significant group in order to provide the customer meaningful access to programs and services. When an interpreter for the needed language cannot be located, the Language Line Solutions (1-866- 874-3972) is used to serve the customer.

Language assistance services are also provided to customers accessing virtual services at the One-Stop. For LEP individuals needing to file unemployment claims in Spanish or Vietnamese, the Oklahoma Employment Security Commission's (OESC) Interactive Voice Response (IVR) system includes a full range self-service experience from filing the initial claim to getting updated information about an existing claim. For LEP individuals needing to file claims in other languages, the OESC has a full-service contract with Language Associates Inc. The 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. Furthermore, LWDBs must not rely on an LEP individual's minor child or adult family or friend to interpret or facilitate communication, except for the following circumstances:

1. In emergency situations while awaiting a qualified interpreter;

2. When the information conveyed is of minimal importance to the services to be provided;
or
3. When an LEP individual specifically requests that an accompanying adult provide language assistance and they agree to provide assistance to the individual. If a Local Area permits an accompanying adult to serve as an interpreter for an LEP individual, it must make and retain a record of the LEP individual's decision to use their own interpreter.

Finally, where precise, complete, and accurate interpretations or translation of information and/or testimony are critical for adjudicatory or legal reasons, LWDBs can still provide their own, independent interpreter, even if an LEP individual wants to use their own interpreter as well. This also applies in cases where the competency of the interpreter requested by the LEP individual is not established. (29 CFR Section 38.9(f))

LWDBs must also include a Babel Notice, indicating that language assistance is available in all communications of vital information. This includes letters or decisions in hardcopy or electronic formats. (29 CFR Section 38.9(g)) OOWD provides technical assistance to LWDBs regarding Babel Notices in TA-02-2019.

IV. COORDINATION WITH STATE PLAN PROGRAMS

The Oklahoma Core Partner Agency Directors, a discussion group working on Core Partner WIOA Programs compliance, were engaged in writing and also appointed staff to draft the state plan. The core partner staff organized to develop the planning process. In developing the Unified State Plan and modifications, the core partners met and continue to meet to share information, compile data, and focus on the outcomes of the workforce system and state plan process.

Within Oklahoma, the Governor's Council for Workforce and Economic Development (GCWED) has been tasked with using data to inform policy, track progress and measure success. State workforce partners, departments, and agencies impacting career readiness will develop state performance metrics, benchmarks and targets.

The following statewide efforts highlight the specific state plan programs representing the work of core partner programs and the state workforce system:

System Oversight Subcommittee

The Oklahoma Works System Oversight Subcommittee, established in 2012, is composed of Oklahoma workforce development system partners, including the Governor's Council for Workforce and Economic Development, the Oklahoma Department of Career and Technology Education—Adult Basic Education, the Department of Rehabilitation Services - Vocational Rehabilitation, the Department of Human Services, the Oklahoma Employment Security Commission--Wagner-Peyser, the State Regents for Higher Education, the Oklahoma Department of Commerce, and Title I programs representing Adults, Dislocated Workers and Youth. The business community is also represented. It is hoped that other entities, such as the Department of Corrections, and the Departments of Health and Mental Health will eventually be added to establish a more comprehensive approach for creating solutions.

Recognizing the necessity to build a new, more responsive, workforce development system to meet the needs of Oklahoma's businesses and create wealth for the state, the team has been a cohesive unit. This subcommittee was designed to carry out the strategic mission of GCWED and reports to the Workforce System Oversight Committee of that body.

At the present time, the committee is collaborating in writing and identifying policies and processes that will continue to build and improve the workforce development system in wake of

the WIOA implementation, as well as contribute to Oklahoma’s overall economic well-being. They meet on a regular basis and identify program specific barriers and create solutions to move forward. Local areas convene partners to respond to the needs of their local areas and regions. Beginning in 2020, the System Oversight Subcommittee moved their meetings to rotate across local areas and meet in local American Job Centers to better their understanding of the unique challenges and opportunities across the state.

The WIOA requires local planning regions to write local and regional plans and updates. The sub- committee is actively working on reviewing plan updates which will include input from all the agencies involved. There are several ways the state’s workforce system will benefit from the regional unified plans, some which include: a more effective, consistent, user-friendly, customer-focused, high quality service-delivery approach for Oklahoma citizens and businesses; efficiencies for workforce programs and staff; alignment among education, workforce, and economic development; accountability for services and results; maximizing all workforce development resources; a true competitive advantage for Oklahoma’s economic development efforts; and a pipeline of appropriately skilled and credentialed workers ready to meet the employment needs of Oklahoma employers.

Access for All Initiative

Oklahoma is focused on accessibility for all jobseekers, businesses and employer’s work sites throughout Oklahoma. Working with Oklahoma Works, the system partners bring sharper focus on developing and employing more Oklahomans with disabilities. The Oklahoma Department of Rehabilitation Services is leading Oklahoma’s Workforce System towards enhanced accessibility. The objective is to provide equitable services to individuals with disabilities and to ensure that all Workforce System partners comply with the Americans with Disabilities Act (ADA).

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. The initiative provides training, consulting, and resources to ensure that individuals with disabilities are intentionally included. 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 programs in person, on the phone, or through the web. Access for All is brought to Oklahoma Works through a partnership between the Oklahoma Department of Rehabilitation Services and Oklahoma ABLE Tech (Oklahoma’s Assistive Technology Act Program).

The one-stop system standards and certification criteria policy will be designed utilizing the Americans with Disability Act (ADA) for physical accessibility. The Oklahoma Electronic and Information Technology Accessibility Law and Standards will be applied for accessibility of digital services. The Web Content Accessibility Guidelines (WCAG) 2.0, Levels A and AA, will be utilized for websites, web applications, and digital documents certification criteria and standards.

Ensuring opportunities for all is critical to meet the goal in creating an environment where people with disabilities have the same opportunities to participate in the workforce as do people without disabilities. As businesses and employers find that the labor pool is tightening, following through on these criteria and standards will ensure businesses and employers have access to more qualified people to fill needed positions.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of	Yes

The State Plan must include	Include
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;	
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 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;	Yes
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	Yes

The State Plan must include	Include
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);	
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 Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
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

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

Oklahoma designated four planning regions identified as Central, Northeast, Western and Southeast that are comprised of the six local workforce development areas. In 2016, these regions were identified through nine public statewide meetings, with input from the Oklahoma Employment Security Commission, Oklahoma Department of Career and Technology Education, and the Oklahoma Department of Rehabilitation Services, regional business leaders, and identified through labor market areas, regional assessments, regional asset mapping, market areas, commuting patterns, employment, population and demographics. The four planning regions provide the best alignment with areas such as the Oklahoma Department of Commerce Economic Development Areas and the Oklahoma Health Care Authority Regions. Each area has

sufficient federal and non-federal funding and appropriate education and training providers to administer regional activity.

The four designated Planning Regions consist of the following counties and local workforce development areas.

CENTRAL PLANNING REGION

The Central Planning Region is comprised of one (1) Workforce Development Area: Central Oklahoma Workforce Innovation Board. The Central Planning Region is comprised of the following nine (9) counties: Canadian, Cleveland, Hughes, Lincoln, Logan, Okfuskee, Oklahoma, Pottawatomie, and Seminole

NORTHEAST PLANNING REGION

The Northeast Planning Region is comprised of two (2) Workforce Development Areas:

Northeast Oklahoma Workforce Development Board, and Green Country Workforce Development Board. The Northeast Planning Region is comprised of the following eighteen (18) counties: Adair, Cherokee, Craig, Creek, Delaware, Mayes, McIntosh, Muskogee, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Rogers, Sequoyah, Tulsa, Wagoner, Washington

SOUTHEAST PLANNING REGION

The Southeast Planning Region is comprised of the one (1) Workforce Development Area: Southern Workforce Board. The Southeast Planning Region is comprised of the following seventeen (17) counties: Atoka, Bryan, Carter, Choctaw, Coal, Garvin, Haskell, Johnston, Latimer, Le Flore, Love, Marshall, McCurtain, Murray, Pittsburg, Pontotoc, Pushmataha

WESTERN PLANNING REGION

The Western Planning Region is comprised of two (2) Workforce Development Areas: Western Oklahoma Workforce Development Board, South Central Workforce Investment Board. The Western Planning Region is comprised of the following thirty-three (33) 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, Woodward

LOCAL WORKFORCE DEVELOPMENT AREAS

Central Oklahoma Workforce Development Area

In 2019 the Central Oklahoma Workforce Development Area's (WDA) population was 1,438,177. The Central WDA is composed of the following counties: Canadian, Cleveland, Logan, Oklahoma, Hughes, Lincoln, Okfuskee, Pottawatomie, Seminole.

Green Country Workforce Development Area (formerly Tulsa Oklahoma Workforce Development Area and Eastern Workforce Development Area combined)

In 2019 the Tulsa Oklahoma Workforce Development Area's population was 789,049 and the Eastern Workforce Development Area's population was 319,339 with a combined total for Green Country WDA of 1,108,388.

The Green Country WDA is composed of the following counties: Adair, Cherokee, Creek, McIntosh, Muskogee, Okmulgee, Osage, Pawnee, Sequoyah, Tulsa, and Wagoner.

Western Oklahoma Workforce Development Area

The Western Oklahoma Workforce Development Area is composed of the following counties: Alfalfa, Beaver, Beckham, Blaine, Cimarron, Custer, Dewey, Ellis, Garfield, Grant, Greer, Harmon,

Harper, Jackson, Kay, Kingfisher, Kiowa, Major, Noble, Payne, Roger Mills, Texas, Washita, Woods and Woodward. In 2019, the Western Oklahoma WDA's population was 417,711.

Northeast Oklahoma Workforce Development Area

In 2019 the Northeast Workforce Development Area's population was 284,121. The Northeast WDA is composed of the following counties: Craig, Delaware, Mayes, Nowata, Ottawa, Rogers and Washington.

South Central Oklahoma Workforce Development Area

In 2019 South Central Workforce Development Area's population was 307,277. The South Central WDA is composed of the following counties: Caddo, Comanche, Cotton, Grady, Jefferson, McClain, Stephens and Tillman.

Southern Oklahoma Workforce Development Area

In 2019 the Southern Oklahoma Workforce Development Area's population was 408,380. The Southern WDA is composed of the following counties: Atoka, Bryan, Carter, Choctaw, Coal, Garvin, Haskell, Johnston, Latimer, Le Flore, Love, Marshall, McCurtain, Murray, Pittsburg, Pontotoc and Pushmataha.

Due to continued reductions in funding, and in an effort to increase funding for direct client services, Oklahoma has made a concentrated effort to work in conjunction with local areas to encourage them to seek re-designation and look at ways to streamline administrative costs. As an example of the state's efforts in this area to improve effectiveness and efficiency, since 2016, Oklahoma has reduced the number of local workforce areas from 11 to 6 and reduced the number of fiscal agents from 10 to 3, since 2010. The Governor's Council approved workforce development areas are: Central, Green Country, Northeast, South Central, Southern, and Western.

Designation of Workforce Development Areas

The Governor's Council recommends designations of local workforce development areas and will continue to work with local workforce areas on re-designation requests. Any contemplated changes in areas are discussed with all parties involved including the local elected officials, Workforce Development Boards, and service providers. Changes in workforce development areas are done only in the best interests of the State and the business and job seeker customers in that area.

State policy OWDI #02-2015, Local Area Initial Designation Process, provides guidance for the application and appeal for initial designation decisions. Once a completed application is received, the Governor's Council for Workforce and Economic Development Workforce System Oversight Committee (WSOC), in collaboration with the appropriate staff from the OOWD will verify the information provided in the application. The WSOC will use the results of this assessment to determine whether to recommend approval or denial of the application.

For redesignation of an area, an agreement must be reached by local area elected officials and a formal request for a new area or redesignation may be sent to the Governor through his/her administrative entity, the Oklahoma Office of Workforce Development (OOWD). In addition to review by OOWD, the Governor's Council for Workforce and Economic Development (GCWED) through its Workforce System Oversight Committee or through routinely scheduled meetings of the entire Council, shall review the request and may offer recommendation of the approval of the area. This process is detailed in state policy OWDI #02-2017, Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board.

Related Policies

- OWDI 02-2015 Local Area Initial Designation Process- issued July 1, 2015
- OWDI 06-2015 Process for Existing Local Workforce Development Area Conditional Designation - issued July 1, 2015
- OWDI 02-2017 Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board - issued February 6, 2017

“Performed successfully” and “Sustained fiscal integrity”

The criteria of “performed successfully” and “sustained fiscal integrity” are defined in the Local Area Initial Designation Process (OWDI #02-2015). The policy defines “performed successfully” as a local area having achieved at least 80 percent of their local performance goal on each performance measure for PYs 2012 and 2013.

The policy defines “sustained fiscal integrity” as such that the local area has not been found in violation of one or more of the following during PYs 2012 or 2013:

1. Final determination finding(s) from audits, evaluations, or other reviews conducted by State or local governmental agencies or the Department of Labor identifying issues of fiscal integrity or misexpended funds due to the willful disregard or failure to comply with any WIA requirement, such as failure to grant priority of service or verify participant eligibility: or
2. Gross negligence - defined as a conscious and voluntary disregard of the need to use reasonable care, which is likely to cause foreseeable grave injury or harm to persons, property, or both; or
3. Any failure to observe accepted standards of administration. Local areas must adhere to the uniform administrative requirements set forth in Title 2 CFR Part 200, and Title 29 CFR Parts 95 and 97. **Local areas must have fully met their federally mandated responsibilities for the two previous program years (PY 2012 and PY 2013) and including timely reporting of WIA participant and expenditure data, timely completion and submission of the required annual single audit, and have not been placed on cash hold for longer than 30 days.** [In alignment with WIOA Section 106(e)(2).]

Additionally, the Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board (OWDI 02-2017) outlines necessary assurances related to determining “performed successfully” and “sustained fiscal integrity” criteria have been met.

Necessary Assurances

- The new board shall comply with the applicable uniform cost principles included in the appropriate circulars or rules of the Office of Management and Budget (OMB). [WIOA Section 184(a) (3)].
- All financial reporting shall be done in compliance with federal and state regulations, and guidance (i.e., directives and information notices) issued by OOWD. Failure to comply with financial reporting requirements will be subject to potential cash hold. [29 Code of Federal Regulations (CFR) 97.21(g)].
- All close out reports will comply with the policies and procedures listed.
- The new board will comply with the audit requirements specified in Title 2 CFR Subtitle A Chapter II Part 200 Subpart F. Failure to comply may result in sanctions imposed by the State.

- The new board will maintain and provide to auditors, at all levels, accounting and program records including supporting source documentation.
- No funds received under WIOA will be used to assist, promote, or deter union organizing. [WIOA Section 181(b)(7)].
- The new board will comply with the nondiscrimination provisions of WIOA Section 188, including the collection of necessary data.
- Funds will be spent in accordance with written United States Department of Labor guidance, and other applicable federal and state laws and regulations.
- The board's procurement procedures will avoid acquisition of unnecessary or duplicative items, software, and subscriptions. (In alignment with 2 CFR Part 200.318).
- The new board will comply with future State Board (GCWED) policies and guidelines, legislative mandates and/or other special provisions as may be required under federal law or policy, including the WIOA or State legislation.
- Priority shall be given to veterans, recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of career and training services funded by WIOA Adult funding. [WIOA Section 134(c)(3)(E) and Training and Employment Guidance Letter 10-09].

If the new board is located within a planning region they will be required to meet the regional planning requirements of WIOA Section 106 (c) (1).

The appeals process relating to designation of local areas is outlined in OWDI 02-2015 Local Area Initial Designation Process (issued July 1, 2015). An area may appeal the denial of its request for initial designation to the Workforce System Oversight Committee (WSOC) of the Governor's Council for Workforce and Economic Development by requesting an appeal and hearing within 20 calendar days from the mailing date of the notice of denial of initial designation. The written appeal request must specify the grounds on which the appeal is sought and why the appellant should be initially designated. Within five (5) calendar days of the receipt of the appeal, the WSOC will contact the appellant and schedule a hearing date. The WSOC will conduct the hearing process and provide a written decision no later than five (5) calendar days after the hearing. The approval or denial will be sent as a recommendation to the Governor, with whom the final decision rests. A second level of appeal may be submitted to the U.S. Department of Labor [WIOA Section 106(b)(5)] within 14 days, with a copy provided to the Dallas ETA Regional Administrator.

The appeals process relating to WIOA determinations for infrastructure funding is outlined in OWDI 24-2017, Change 1. 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 SFM. The appeal process related to the SFM is a modified version of the complaint and grievance procedures found in OWDI #16-2017, Change 1.

Within 5 business days from the notification of contributions under the SFM, appeals may be sent by email to workforce@okcommerce.gov, or mail to: Oklahoma Office of Workforce Development 900 N. Portland Ave. Oklahoma City, OK 73107

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 workforce@okcommerce.gov or to: Oklahoma Office of Workforce Development (OOWD) Oklahoma Department of Commerce 900 North Portland Avenue Oklahoma City, OK 73107

Upon receipt of the request for a State hearing, the Executive Director of OOWD or his/her designee shall review the appeal and shall provide an opportunity for a hearing. The Executive Director of OOWD 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:

- The date, time, and place of the hearing, in writing at least 10 business days prior to the date of hearing;
- The original appeal filed and documentation of informal resolution attempts;
- Relevant sections of WIOA or any other federal regulations involved;
- 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,
- 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, 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 OOWD. Composition of Appellate Pane

The Appellate Panel will consist of three (3) members who are appointed by the Executive Director of OOWD, 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 OOWD staff or hired entities. The Executive Director of OOWD 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:

- The names of the parties involved;
- A statement of the SFM appeal and issues related to the appeal;
- A statement of the facts;
- The State Appellate Panel's decision and the reasons for the decision; and
- A statement of the action, if any, to be taken.

The determination by the Appellate Panel for the SFM is considered final.

Appeals Process to the Secretary

One-Stop partners have the right to file an appeal of the final decision by the Appellate Panel to the U.S. Department of Labor (USDOL) per 20 CFR §683.650. Federal appeals must be made within thirty (30) calendar days of the receipt of the decision of the Appellate Panel. USDOL will notify the Governor and the One-Stop partners of the final decision no later than forty-five (45) days after receiving a formal appeal. Appeals submitted to USDOL must be submitted by certified mail, return receipt requested, to:

Secretary U.S. Department of Labor

Attention: ASET

200 Constitution Avenue, NW

Washington, D.C. 20210

A copy of the appeal must be simultaneously provided to the Governor, the OOWD and to the USDOL Regional Office by certified mail to:

Regional Administrator

U.S. Department of Labor, Employment and Training Administration

Region IV (Dallas) Office

525 S. Griffin Street, Room 317 Dallas, TX 75202

2. STATEWIDE ACTIVITIES

The Oklahoma Office of Workforce Development (OOWD) oversees the administration of the Workforce Innovation and Opportunity Act (WIOA) Title I programs. As administrator, OOWD issues policy guidance through its series of Oklahoma Workforce Development Issuances (OWDIs) and formal memos that are posted online on the Oklahoma Works website at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

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.

System governance policies and guidance are collaboratively developed by the System Oversight Subcommittee of the Workforce System Oversight Committee of the Governor's Council for Workforce and Economic Development. This group is composed of core and required partners who work collaboratively to develop policy for the state system. Additional partners and workforce system stakeholders are consulted through a task force model and have the opportunity to 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. The Oklahoma Office of Workforce Development (OOWD) has focused on increasing and improving technical assistance available to local boards as well as system partners.

These efforts continue to be a priority for the state. The utilization of set aside funds, was critical in assisting the Workforce Development Areas transition from WIA to WIOA and remains critical as the state moves its focus from implementation to system enhancement and improvement.

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, EMSI Analyst, OKGrants via contract with Agate Software, Zendesk, Dropbox, and Smartsheet.

Sponsorships

Set aside funding used to sponsor events throughout the state is used only on 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 of 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.

Memberships

Set aside funds are also used to fund critical memberships with organizations whose efforts and activities provide states with information, tools and assistance proven to improve the success of their workforce development system efforts. These organizations include the National Governors Association, the National Association of State Workforce Boards, and the National Association of Workforce Boards.

The Governor's set aside has allowed the state to accomplish its goals of expanding the amount of technical assistance, providing assistance for planning regions and partners, and supplementing the efforts and growth initiated by the ApprenticeshipUSA grant. Moving forward, the state will maintain the efforts as described above and will also explore and evaluate directions and improvements designed to improve the workforce system in Oklahoma.

The Oklahoma Office of Workforce Development (OOWD) 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 OOWD, 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 and non-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.okjobmatch.com. When the layoff or closure involves organized labor, Rapid Response works closely with organized labor representatives in conducting Rapid Response activities.

Rapid Response funds are used at the state level by OOWD and OESC. They are set aside for emergencies, or for when all allocated resources are expended. The local areas are involved as a part of the Rapid Response Team, but Rapid Response funds are not currently allocated to local workforce boards, but the state plan to move in that direction in the coming year.

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

Once the OOWD receives notification of a layoff, 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.

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.

Each section of the meeting starts with a short video related to the information they will be receiving next. 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 a number of strategies in place, including:

Incumbent Worker Training will be implemented at the state level in Oklahoma beginning in 2020 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.

OOWD utilizes proprietary software by Dun and Bradstreet to identify struggling businesses and performs outreach to determine if layoff aversion services would be beneficial to the company.

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

Oklahoma's CareerTech system consists of 29 technology center districts with 59 campuses provides technical, management, safety, and process improvement training for incumbent workers in Oklahoma companies. CareerTech 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.

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 if a National Emergency Grant is needed. If required the group will also provide the Governor's office with necessary information.

The Oklahoma Office of Workforce Development 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
- FEMA

- Oklahoma Department of Rehabilitation Services
- Oklahoma Department of Commerce
- 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
- SBDC

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 TAA 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 a 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

Oklahoma's strategies for ensuring work-based training models are of high quality for both participants and employers include:

The implementation of a 40% minimum training expenditure rate policy to ensure more WIOA Adult and Dislocated Worker funding is directed toward quality training programs, including work-based models such as On-the-Job Training (OJT), Incumbent Worker Training, Transitional Jobs, and Customized Training directly linked to an in-demand industry or occupation.

Local workforce development boards must adopt Transitional Jobs policies to identify employers who can provide quality work experiences to assist individuals with barriers to obtain unsubsidized employment, while ensuring against the displacement of employees and the use of WIOA funds to fill openings resulting from labor disputes. Local boards are encouraged to develop strategies to utilize Transitional Jobs 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.

On-the-job training (OJT) continues to be a successful strategy for delivering training services through the adult funding stream, allowing businesses to provide specific job training to new employees in a normal work environment. OJT contracts account for the quality of the employer-provided training and advancement opportunities such as industry recognized credentials for an in-demand occupation. Local OJT policies ensure the duration of the training is sufficient for the participant to acquire the knowledge and skills needed to become proficient on the job, which benefits the participant and the employer. A pre-award review of the OJT contract ensures the employer has not exhibited a pattern of failing to provide trainees with continued long-term employment with wages, benefits and working conditions equal to that of regular employees.

Oklahoma's worksite agreement policy, utilized for all participants in Title I work experience programs, including transitional jobs, establishes certain assurances and conditions that must be agreed upon between the WIOA Grantee and/or Service Provider and the work experience worksite. An orientation is provided to the worksite supervisor prior to the first trainee placement at a worksite to cover topics that promote a quality workplace. The WIOA Worksite Agreement consists of three parts: The Worksite Terms and Conditions, the Trainee Work Plan, and the Trainee Timesheet. Additional attachments to the Agreement include the WIOA Work Experience Trainee Evaluation and a Work Experience Incident Report. Oklahoma's worksite agreement forms are designed to help ensure high quality training for the WIOA participant, leading to a highly trained employee for the employer.

In October 2019, Oklahoma Office of Workforce Development (OOWD) issued guidance for Incumbent worker training (IWT). The Oklahoma IWT guidance establishes eligibility requirements for local workforce development areas to create policies and definitions to determine which workers, or groups of workers, are eligible for incumbent worker services. Preference is given to smaller businesses with less than 50 employees, businesses located in an Opportunity Zone as defined by Oklahoma Statutes Title 68, Section 3603 Definitions, businesses located in rural counties, training for occupations on the Critical Occupations list as presented on the OOWD website (oklahomaworks.gov), training provided to increase employee skills as a layoff avoidance strategy, or training that leads to a significant upgrade in employee skills.

IWT is designed to increase the competitiveness of the employer by developing a highly skilled workforce that will result in increased business financial viability, stability, competitiveness, and productivity. To avert the risk of 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 skill attainment for incumbent workers. However, training that is necessary for employers to meet federal "safe workplace" requirements, (e.g., OSHA, food handler certifications, etc.) is not considered IWT.

The competitiveness of workers participating in IWT may be increased by enhancing existing skills, learning new skills, and earning employer or industry-recognized credentials, in addition to retaining employment, maintaining their careers, and/or increasing their earnings potential.

An ideal IWT 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 WIOA participants seeking employment.

In April 2018, the Oklahoma legislature passed Senate Bill 1171 to establish the Governor's Council of Workforce and Economic Development as having the authority over the Oklahoma Work-Based Learning Program. The primary purpose was to create a strong work-based learning infrastructure within the state system so that work-based learning efforts are sustainable to meet future workforce demands. The goals of the Work-Based Learning Program are to: coordinate opportunities through the state's labor market and exchange systems to connect youth and adults in public and private sectors, work toward increasing the number of youth and adults participating successfully in work-based learning opportunities, set standards for equal and fair access to work-based learning experiences for all Oklahomans, convene industry partners to develop industry-specific standards and promote quality and paid work-based learning experiences.

OOWD utilizes Labor Market Information (LMI) to not only develop our in-demand occupation lists, but also as an approach to target industries with the greatest projected growth and the largest skills gap. This information allows our office to strategize on training and development needs to ensure we are producing the workforce our businesses need both today and in the future. Through our relationships with our core partners and community organizations, OOWD works to braid funding resources in order to provide equitable opportunities to individuals with barriers to employment. The creation of Work-Based Learning opportunities such as internships, incumbent worker training, and registered apprenticeships is aligned with the Governor's Council for Workforce and Economic Development plan to create a well-trained workforce while increasing the financial and economic opportunities for workers.

The use of Registered Apprenticeship (RA) as a work-based training model has increased significantly in the state. High quality training for both the participant and the employer is assured by the Oklahoma Office of Apprenticeship in accordance with 29 U.S. Code 50 - Promotion of Labor Standards of Apprenticeship.

2. REGISTERED APPRENTICESHIP

Registered Apprenticeship (RA) enables Oklahoma to prioritize education and training resources to support placement into high demand occupations through hands-on training and related instruction while helping employers build the skilled workforce their businesses need to succeed.

The COVID-19 pandemic has created lasting affects in the labor market, leaving essential industries scrambling to find workers to fill vacancies. Interest in Registered Apprenticeship had an unprecedented uptick during the 2021 calendar year: increasing the number of newly registered apprenticeship programs by 200% across the state from the prior year.

The Oklahoma Office of Workforce Development (OOWD) will continue to generate Registered Apprenticeship awareness for both employers and employees, showcasing RAPS as a viable and long-term solution to combat workforce shortages.

OOWD received a \$1.06 million Apprenticeship State Expansion (ASE) grant from the U.S. Department of Labor in 2019 to expand and diversify apprenticeship opportunities in Oklahoma. OOWD 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.

Through the use of ASE Grant funds, Work-Based Learning staff will focus on creating and expanding RA opportunities within the industries that demonstrate a need for skilled workers and a high potential for growth and has set a goal to register 300 new registered apprenticeship programs (RAP) by June 30, 2022. 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, 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 percent of workers who are 55+ to total jobs, and the potential for opportunities for special populations based on licensing requirements and safety regulations. The nine industry sectors staff are targeting for program registration include: Finance, Public Service/Government, Retail, Child Care/Early Childhood Education, Food Service and Hospitality, Public Utilities, Alternative Energy, Aerospace, Information Technology and Health Care. Strategies for expansion and diversification also include outreach to specific underserved populations including women, individuals with disabilities, formerly incarcerated individuals, minorities, veterans, and out of school youth. OOWD 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. OOWD has set a goal to increase the number of individuals enrolled in a registered apprenticeship program by 800 by June 2022. However, the OOWD is requesting a no-cost extension to lengthen the period of performance on the ASE grant due to decreased employer engagement caused by the pandemic.

In June of 2020, OOWD received \$450,000 for a Tier One grant from the U.S. Department of Labor's Building State Capacity to Expand Apprenticeship through Innovation (SAE 2020) grant. Under the Tier One status no participants are required and instead, the funds are allocated towards the state's apprenticeship expansion efforts as follows: promotional outreach through a targeted ad campaign, employer incentives, registered apprenticeship mentor stipends, and educator externships and industry tours.

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 postsecondary credentials, credits, and degrees along with the work experience, mentorship, and networks they need to thrive in a rapidly changing economy. For employers, youth apprenticeship is a cost-effective talent strategy, as apprentices build skills to meet evolving business needs and contribute to their employers' bottom line.

In June of 2019, OOWD was invited to participate in the Partnership to Advance Youth Apprenticeship (PAYA) Network. The PAYA Network is a national learning collaborative designed to link dynamic, place-based partnerships that are working to launch, expand, and improve apprenticeship opportunities for high school-aged youth. Through the PAYA Network, this group of innovators will share best practices and co-develop solutions to common challenges. To support their goals, PAYA will work with network members to organize and host a range of activities including national working groups as well as virtual and in-person convenings. PAYA will also share opportunities to accelerate members' work and identify avenues to promote members' accomplishments to local, state, and national audiences.

Led by New America, the Partnership to Advance Youth Apprenticeship (PAYA) is a multi-year, multi-stakeholder initiative established in 2018 to assist innovative partners around the country in developing robust youth apprenticeship programs that can be scaled and replicated

to connect the learning needs of youth with the talent needs of industry. New America created PAYA to strengthen the link between education and economic mobility. PAYA convenes experts and partners, publishes and disseminates research, supports a network of practitioners, and provides grants and direct assistance to promising youth apprenticeship programs in states, cities, and regions across the U.S. PAYA includes eight National Partner organizations from across the education, workforce, and policy sectors: Advance CTE, CareerWise Colorado, Charleston Regional Youth Apprenticeship, Education Strategy Group, JFF, National Alliance for Partnerships in Equity, National Fund for Workforce Solutions, and the National Governors Association.

The Oklahoma Office of Workforce Development (OOWD) received a \$1.499 million Youth Apprenticeship Readiness Grant (YARG) from the U.S. Department of Labor in 2020 to expand and develop apprenticeship and pre-apprenticeship opportunities for Oklahoma youth 16-24. As part of YARG, OOWD is leveraging and expanding the state agency partnerships established under the ASE grant along with newly created industry partners to develop a youth apprenticeship referral process and facilitate the coordination of changes to the state's case management system, OKJobMatch. Funds from the grant will also be used towards creating and implementing a branding and communication plan targeting youth and parents and providing employer/program sponsor reimbursements for structured on-the-job learning/training and related instruction in an effort to expand the number of RAPS and apprentices in Oklahoma. Research indicates that apprentices often dropout of an apprenticeship program during the first year due to lack of supportive services. To combat this, OOWD has designated grant funds to provide supportive services to participants to increase the rates of successful completion.

Additionally, OOWD is utilizing grant funds to strengthen relationships with industry and education providers to leverage intermediary networks for consortium model apprenticeship programs. OOWD has partnered with the Oklahoma Manufacturing Alliance (OMA) and the Oklahoma Building and Construction Trades Council as industry intermediaries and grant sub-recipients. Under this grant, OOWD has established a goal of developing a total of 25 apprenticeship programs and expanding 15 others by June 2024. Through these expansion efforts, OOWD will serve 225 participants: 25 pre-apprentices and 200 apprentices.

Alignment with WIOA Services

There are several ways in which Oklahoma plans to utilize Title I training services in conjunction with RA programs. System integration efforts aimed at increasing the alignment of apprenticeships with workforce policy are reflected in updates to Oklahoma's Strategic Plan and Title I policies.

OOWD staff have created a referral process to refer businesses with work-based learning opportunities to local workforce boards. OOWD staff offer to place every registered apprenticeship sponsor on the eligible training provider list once registration has been completed, this allows for increased referrals to jobseekers registering for training-related services. Additionally, OOWD has created trainings and technical assistance webinars to support boards in the development of local apprenticeship programs through business services. OOWD provided employer incentive grants in 2019 to encourage the development of apprenticeship programs. The incentive grants were modified to an incentive fund application in June 2021 in order to make the process more intuitive. Employer recipients are required to work with their local workforce development board and register and post apprenticeship opportunities in OKJobMatch and US DOL's Apprenticeship Finder as part of the grant requirements.

Oklahoma's Adult and Dislocated Worker Policy describes the ways in which Oklahoma plans to use training services in conjunction with RA programs, including:

- Developing an ITA for a participant to receive all or a portion of the RI component of the RAP;
- Utilizing a contract for all or a portion of the OJL component;
- A contract to support the RI component of a cohort of apprentices;
- A contract to support all or a portion of the OJL component of a cohort of apprentices; or
 - a combination of an ITA to cover the RI along with an OJT contract to cover the OJL.
- Oklahoma’s policy also allows for the utilization of incumbent worker training for upskilling apprentices who already have an established working/training relationship with an RA program, provided the requirement of WIOA 134(d)(4) are met.
- Supportive services may be utilized when tied to, and in conjunction with, the OJL or RI portion of a RAP, and when necessary to facilitate a participant’s success in a RAP. Supportive services are particularly critical in the first year for RAP completion.
- In all instances, a participant’s eligibility for WIOA must be properly established and documented prior to the commitment of funds for RAPs

OOWD upgraded the case management system, OKJobMatch and performance reporting systems to capture apprentice data on WIOA participants. OOWD plans to use administrative data on WIOA apprentices tracked in OKJobMatch to evaluate how development areas can better place WIOA participants into apprenticeship positions. This evaluation will inform communication strategies and processes between the OOWD, the local workforce boards and one stop shop operators on opportunities for participants and the supportive services and incentives that are more likely to assist participants in completing apprenticeship programs.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

Oklahoma Workforce Development Issuance 09-2020, released in October 2020, outlines the types of training authorized under WIOA, the requirements to become an eligible training provider (ETP), and the eligibility requirements for training programs. The policy also sets additional criteria for organizations applying for ETP approval, stresses the importance of required data reporting, and defines State, Local Workforce Development Board (LWDB), and Training Provider responsibilities in the state. 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 Oklahoma’s virtual case management system, OKJobMatch.com, which is also the system used by the state to receive, review and process applications for ETPL inclusion.

Eligible Training Provider List Procedure

Adding a program to the state’s Eligible Training Provider List is a two phase process. First, providers must apply to become approved by the state as Eligible Training Providers. The current performance benchmarks for the initial eligibility of training providers, with the exception of Registered Apprenticeships, are based on the All Student population:

- The current performance benchmarks for the initial eligibility of training providers, with the exception of Registered Apprenticeships, are based on the All Student population:
- Number of students who completed training (must meet minimum 35%);

- Number of students that attained credentials – (must meet minimum 35%);
- Median Earnings: The median earnings of training program participants who are in unsubsidized employment during the second quarter after exit;
- Average Earnings in the 2nd quarter after exit; and
- Average Earnings in the 4th quarter after exit.

Then the provider must submit an additional application for each training program they wish to offer for initial program eligibility.

By creating an account in OKJobMatch, training providers may enter and edit information about their training institutions and the programs they offer. Once a provider applies online and is approved by the State, the local workforce board reviews the program entered by the provider and recommends approval to OOWD for programs that meet local criteria and the requirements stipulated in State policy.

Prior to beginning the application, an ETP applicant must assure 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. With the exception of Registered Apprenticeship programs, training providers must comply with the criteria, information requirements, and procedures established under WIOA Section 122 to be included on the list of eligible providers of training services.

Initial Eligibility Criteria for Training Programs

All entities who have been approved as Eligible Training Providers must submit an additional application for each training program to be considered for inclusion on the ETP List. Training providers are encouraged to apply for program approval at least 60 days in advance of initial program offerings. Required information for initial approval include a complete description of the training program to be offered, including:

- Program cost,
- Occupation(s) for which the training prepares the individual;
- The number of participants enrolled in the program during the reporting period;
- The number of individuals who exited the program during the performance period. (defined as the total number of students who completed, withdrew, or transferred from the program of study in the reporting period.);
- Performance information pertaining to the training program's All Student completion rate (defined as the aggregate number of all individuals, which includes both WIOA and non-WIOA, in the program of study/training program.)
- Performance information pertaining to the training program's All Student credential attainment rate; and

- Information addressing the alignment of the training program with in-demand industry sectors and occupations.

An exception to the program specific performance requirement has been made for new programs that the ETP has never provided before. Initial eligibility for new training providers that have no history of providing training programs may be determined eligible for one year only, based on information such as: Whether they have attained the appropriate license, registration, accreditation, or approval to operate in Oklahoma; Whether have operated under another name(s); Whether they offer training aligned with in-demand occupations and industry sectors; and Information pertaining to operations in other states. Providers who fail to accurately submit all required initial eligibility information within 60 days from the date of the initial application will be denied.

Continued (Subsequent) Eligibility for Training Programs

After the initial year of eligibility, approved training programs must meet continued (subsequent) approval requirements to remain on the ETPL. Continued eligibility will then be reviewed at least every two years. 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.

As required by WIOA, the state takes into account the following WIOA performance criteria for determining an ETP's continued eligibility, based on the ETP's All Student population:

- The number of the provider's program participants who are in unsubsidized employment in the 2nd quarter after program exit;
- The number of the provider's program participants who are in unsubsidized employment in the 4th quarter after program exit;
- The median earnings of the provider's program participants during the 2nd quarter after exit from the program;
- The percentage of program participants who obtain a recognized postsecondary credential during participation in or within one year after exit from the program;
- The average earnings of individuals who are in unsubsidized employment during the 2nd quarter after exit; and
- The average earnings of individuals who are in unsubsidized employment during the 4th quarter after exit.
- Local coordinators are encouraged to contact the ETP within the 45 day period before the performance update is due as a courtesy reminder and to prevent removal of programs from the ETPL.

The All Student data is reviewed by the local area for a local determination, and then by the state for approval. The ETP receives an Eligibility Expiration Notice within 45 days of the date the previous program approval (or re-approval), provided that the contact information on the Training Providers Details page is current. ETP are strongly encouraged to update performance and cost information within the eligibility expiration period.

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.

Failure to provide the updated information after the updated performance request may result in the training program's denial of continued eligibility. Repeated failures to update training program performance and cost information may result in the training provider's removal from the ETPL.

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 OKJobMatch and reported to ETA via the Workforce Integration Performance System (WIPS).

The state is in the process of re-evaluating the current performance benchmarks for ETPL eligibility, including continued eligibility. Oklahoma currently considers program completion rate and the credential attainment rate as the indicators of program performance used for ETPL eligibility determinations. However, the state is in the process of re-evaluating the current performance benchmarks for ETPL eligibility, including continued eligibility. With the aid of the State entities responsible for oversight of training providers, including ODCTE, OSRHE and the Oklahoma Board of Private Vocational Schools (OBPVS), and with input from the local workforce development boards, OOWD will determine a reasonable increase in the minimum performance standards for eligibility. This will ensure quality training providers and programs on the ETPL, as well as better performance outcomes.

Registered Apprenticeship Programs

Registered Apprenticeship Programs are automatically eligible to be included on the ETPL and are exempt from state and local ETP eligibility requirements. Due to the rigorous assessment RAPs have passed as part of the registration process with the U.S. Department of Labor's Office of Apprenticeship (DOLETA/OA), additional information and performance requirements may not be required or requested of RAPs. If openings for new apprenticeships exist in the local area, the RA sponsor's programs will automatically be considered in-demand training, and will be included and maintained on the ETPL as a statewide demand occupation for as long as the openings remain unfilled.

Each RAP sponsor must indicate whether they wish to be included on the ETPL. With the assistance of the State Office of Apprenticeship (OA), each RAP sponsor must be contacted to voice their willingness to be part of the ETPL. RAPs that opt for inclusion on the ETPL may request the State ETPL Administrator to add them to the ETPL with the provision of only the following basic information:

- Occupations included within the RAP;

- The name and address of the RAP sponsor;
- The name and address of the Related Technical Instruction (RTI) provider(s), and the location(s) of instruction if different from the program sponsor's address;
- The method and length of instruction;
- The number of active apprentices; and
- The appropriate NAICS and SOC codes, as currently required by the State's ETPL management system.
- RAPs will remain on the ETPL until:
 - The RAP notifies the OOWD that it no longer wants to be included on the ETPL;
 - The program becomes deregistered under the National Apprenticeship Act;
 - The program is determined to have intentionally supplied inaccurate information; or
 - A determination is made that the RAP substantially violated any provision of Title I of WIOA or the WIOA regulations, including 29 CFR part 38.

ETPs may voluntarily report performance outcomes, however local areas must not establish any RAP-specific reporting requirements. Unlike RAPs, Industry Recognized Apprenticeship Programs (IRAPs) seeking addition to the ETPL must follow the same process requirements as other training programs that are not RAPs, which are detailed in the sections below. IRAPs are required to be on the ETPL to receive WIOA training funds through an ITA.

The registration status of Registered Apprenticeship programs must be verified on a biennial basis. To accomplish this, continued registration status will be requested biennially from the State Office of Apprenticeship.

Intermediaries serving as RAPs who are employers using an outside instructional provider must identify their instructional provider in accordance with requirements established by their local board or the Oklahoma Office of Apprenticeship (OA).

Conditions for Removal from the ETPL

The State may remove a program or programs from the list 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 the OOWD 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 OOWD 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 OOWD management, the OOWD 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 ETPL Responsibilities

OOWD is responsible for the following:

- Develop, maintain, and disseminate the ETPL, including the list of training providers and their programs of study.
- Establish a minimally burdensome mechanism for adding Registered Apprenticeship programs (RAPs) to the list and verifying registration status at least every two years.
- Work with the State Board (the Governor's Council) to develop procedures, information requirements, and criteria for determining eligibility, including clarifying state and local board responsibilities.
- Review and finalize the approval of providers and programs recommended by the LWDBs.
- Determine whether training providers submitted accurate information for the eligibility criteria and performance levels, and take enforcement actions as needed if the provider intentionally submitted inaccurate information or substantially violated WIOA requirements.
- Ensure that state-established minimal performance levels for initial and/or continued eligibility are met, including verifying the accuracy of the information.
- Establish procedures for removing a provider from the ETPL.8. Establish a procedure by which a provider can demonstrate that providing state-required additional performance and cost information would be unduly burdensome or costly.

Local Workforce Board ETPL Responsibilities

The LWDB is responsible for carrying out the following procedures assigned by the State:

- Ensuring that there are sufficient numbers and types of providers of training services (including eligible providers with expertise in assisting individuals with disabilities and eligible providers with expertise in assisting adults in need of adult education and literacy activities) serving the local area and providing the services involved in a manner that maximizes consumer choice and leads to competitive integrated employment for individuals with disabilities.
- Making recommendations to OOWD for approving training providers based on demand occupations in the local area.
- Establishing relationships with the ETPs in the local area to provide technical assistance, collect performance information as required by the State and determining whether the providers meet the state's performance criteria, and locally approving or denying initial and continued eligibility applications based on said criteria.

- Recommending that the state remove ETPs that fail to meet local performance standards, in accordance with local policies and procedures.
- Ensuring that the state’s ETP list is disseminated publicly through the local one-stop system, including in formats accessible to individuals with disabilities, and its partner programs.
- Identifying in-demand sectors or occupations for the local area using relevant labor market information.
- Reviewing the accuracy of eligibility criteria and performance information for initial applications and applications for continued ETPL approval prior to submission to the State for final approval.

As mentioned in bullet 3, the responsibility of developing a relationship with training providers falls on the local area. The success of the ETP program is tied to each local area ETP coordinator’s working relationship with the trainers in their respective areas and serving as the linkage between the clients and the training providers, which leads both to better compliance with state ETP requirements and better outcomes. The state, therefore, is providing technical assistance to the local ETP coordinators to facilitate closer communication and collaboration between providers and local area staff.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDED BY THE ADULT FORMULA PROGRAM

Oklahoma’s Adult and Dislocated Worker policy, OWDI 07-2020, 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 by local workforce development boards (LWDBs) regardless of the level of Adult Formula funds received:

- First, to 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.
- Second, to 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.
- Third, to veterans and eligible spouses who are not included in WIOA’s priority groups.
- Fourth, to priority populations established by the LWDB.
- Last, to non-covered persons outside the groups given priority under WIOA.

In addition to state guidance, local areas are required to establish written policies and procedures to ensure priority for the populations described above.

Oklahoma’s Individual Employment Plan (IEP) policy, OWDI 03-2019, requires documentation of the Adult Priority of Service to ensure that IEPs target the specific needs of each individual determined eligible for Adult program services. The IEP must include the appropriate combination of services needed to achieve each participant’s employment goals, and describe

how and when those services are provided. This process helps ensure the needs of priority populations, especially those who are low-income and/or have been determined to be basic skills deficient, are addressed.

OOWD monitors the local area's application of the priority of service provision as part of annual WIOA programmatic monitoring, which includes interviews with staff and review of participant files, for adherence to federal law, regulations, and State and local policies. Additionally, monitoring of the priority of service is routinely completed by desk reviews throughout the program year, particularly in instances when a local area requests *any* technical assistance related to an adult's eligibility for individualized career services and/or training services funded by the Adult Formula program. The State reviews the local area's uploads to the virtual case management system, which includes an Adult and Dislocated Worker Eligibility Form documenting Adult priority of service. The form is uploaded to the virtual case management system as an enrollment document, along with supporting documentation that validates the priority of service.

In March of 2021, OOWD released a technical assistance memo, TA 01-2021, to the Local Boards to reinforce the statutorily required priority of services for Adult Program participants, emphasizing that at least 50.1 percent of the State's Adult programs must be from at least one of the priority groups. Oklahoma's implementation of the Adult priority of service complies with ETA's envisioned 75 percent benchmark; the State is on track to meet or exceed this benchmark, based on the most recent PY2020 Adult Quarterly Report Analysis, which is also utilized by the State to monitor each local area's targeted services.

5. DESCRIBE THE STATE'S CRITERIA REGARDING LOCAL AREA TRANSFER OF FUNDS BETWEEN THE ADULT AND DISLOCATED WORKER PROGRAMS

The Oklahoma Office of Workforce Development (OOWD) allows a local board to transfer up to 100 percent of the fiscal year funds allocated to the local area for adult and dislocated worker employment and training services between the Adult Program and Dislocated Worker Program.

In an effort to ensure services are available to adults and dislocated workers, each local area must consider how adjusted levels of performance for the primary indicators will be met before requesting such a transfer.

Local areas are required to provide a rationale for the transfer of funds between the programs that addresses:

- The documented need to transfer funds in order to respond to market conditions and use resources effectively that is based on labor market data.
- Justifications for the transfer that is supported by local data, including the number of TAA petitions, WARNs and Rapid Response events in the local area, anticipated layoffs based on local economic conditions, Reemployment Services and Eligibility Assessment (RESEA), and other local American Job Center (AJC) data.
- The impact on jointly funded employment and training programs, the usage of the funds to be transferred, and the consistency of usage with the local strategic plan.
- The local area's progression toward the achievement of the 40% direct participant training expenditure requirement for funding available during the program year for Adults and Dislocated Workers, as well as the local area's determination that they are on track to meet the required 40% for the current, program year.

- The local area being on track to meet participant measurements for the Adult and Dislocated Worker programs.

Local areas must also guarantee the transfer of funds will not unfavorably impact: (1) the employment and training activities of the program that funds are being transferred from; (2) the program that funds are being transferred to; and (3) The WIOA Title I performance measures for the WIOA Adult or Dislocated Worker programs.

C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING 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 IN AWARDING SUCH GRANTS OR CONTRACTS.[11]

The state developed criteria for local boards to utilize in awarding grants for youth workforce investment activities is Oklahoma Workforce Development Issuance 10-2017 “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 situation that will not permit the time required for a competitive solicitation exists.
- After solicitation from a number of sources, competition is determined inadequate.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND 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.

The State expects Workforce Development Boards to focus a higher percentage of Out-of-School Youth (OSY) Funding on direct costs to OSY since this population of youth is more difficult to locate, engage, and will potentially require a longer range of services to be successfully served. We also expect as a result of higher expenditure requirements of OSY funds:

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- Increased collaboration amongst core partners through sharing of costs and information to ensure that youth have access to all available clusters of needs based services.
- A focus on forming and/ or improving alliances with the Department of Education and Quality Pre-Apprenticeship Programs which are aligned with Registered Apprenticeships, Employers, Training Providers as well as Community Based Organization which have traditional connections to disconnected youth.
- Greater disseminating of documented strategies/models amongst Workforce Development Boards that demonstrate success in locating and engaging eligible youth. The state will also support this practice by adopting best practices demonstrated by local partners and/or agencies and other nationally recognized programs that have successfully served similar populations of youth with state, federal or other limited funds.
- We will continue to include the juvenile justice involved youth, e.g., Central Oklahoma Juvenile Center (COJC) Youth in our servicing strategies.

The Oklahoma Office of Workforce Development has developed relationships with the Boys and Girls Club Alliance and a framework for partnering to serve Club Kids in the Oklahoma Works Centers as well as a referral process for directing in-school youth to the local clubs for services. This relationship also resulted in LWDB staff attending focus groups with specific club kids to provide outreach on what workforce offers and it provided the club kids an opportunity to provide feedback on facilities and activities they wanted to see introduced to the clubs or improved. We've also involved the Executive Director Oklahoma Alliance of Boys & Girls Clubs in our State Workforce Youth Programs Committee meetings.

The State is focused on its partnerships with Vocational Rehabilitation to provide transition services to youth with disabilities to ensure high school completion. Local boards will be asked to describe these proposed partnerships in their local plans.

As youth enrolled in a High School Equivalency program are considered out of school and dropouts, many of the obstacles related to perfecting eligibility under WIA for out of school youth are no longer present under WIOA. Similar to Vocational Rehabilitation, local boards will be encouraged to work with their local HSE providers. By reviewing the plans of Adult Education and Family Literacy Act providers, local boards will also have an opportunity to drive performance toward those established for youth in the WIOA programs further enhancing coordination efforts. The state will continue to direct local staff to utilize a portion of the 75% out-of-school youth funding on re-engagement strategies and program related transitional planning for reconnecting disconnected youth to the education and workforce system. Our focus is on:

- Championing these high priority youth receiving occupational skills training and recognized credentials.
- Reinforcing the needs for dropout recovery programs, and;
- Reiterating the need to incentivize milestones and monumental achievements of the youth for increased educational functioning levels and the completion of work experience.
- Recommending and supporting the relationship with community agencies and In-kind resources to leverage the costs of serving these youth.

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED, INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT. [12]

- 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 the objective assessment and ISS.

We have advised our local boards of the necessity of consorting and will continue to support local partnering with authorized and proven organizations capable of 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.

The State policy OWDI 02-2016 Change 2 defines the criteria for an out-of-school youth who needs additional assistance as 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 on the Oklahoma State Department of Education website:
 - Comprehensive Support and Improvement | Oklahoma State Department of Education
 - Additional Targeted Support and Improvement | Oklahoma State Department of Education;
- A youth between 18-24 years of age with a pattern of Poor Work History. Poor work history includes non-reoccurring employment income and sporadic employment.

The State policy OWDI 02-2016 Change 2 defines the criteria for an in-school youth who needs additional assistance as a low-income individual who requires additional assistance to 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 on the Oklahoma State Department of Education website:
 - Comprehensive Support and Improvement | Oklahoma State Department of Education
 - Additional Targeted Support and Improvement | Oklahoma State Department of Education;
- A youth between 18-21 years of age with a pattern of Poor Work History. Poor work history includes non-reoccurring employment income and sporadic employment.

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE “NOT ATTENDING SCHOOL” OR “ATTENDING SCHOOL,” INDICATE THAT IS THE CASE AND PROVIDE THE STATE POLICY FOR DETERMINING WHETHER A YOUTH IS ATTENDING OR NOT ATTENDING SCHOOL.

Attending School under WIOA is defined as a youth not younger than 14 years of age, nor older than 21 years of age and attending any school recognized under Oklahoma Law.

Similar to the WIOA definition, which defines a dropout under the age of mandatory attendance to be a youth who has not attended for a full term or semester, in Oklahoma “school dropout means any student who is under the age of nineteen (19) and has not graduated from high school and is not attending any public or private school or is otherwise receiving an education pursuant to law for the full term the schools of the school district in which he resides are in session.”

Further in Oklahoma, youth in High School Equivalency programs are considered both out of school and dropouts.

There is one exception to age eligibility for youth attending school. Youth with a disability who have an Individualized Education Program (IEP) may be enrolled as ISY after the age of 21. This allows youth with disabilities to be served by the K-12 public school system beyond the age of 21. Such youth may only be enrolled as ISY up to the age allowed by Oklahoma Law Section 168. Student of Legal Age- Completion of Twelfth Grade to receive secondary education services.

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL’S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

The State of Oklahoma uses the WIOA definition of Basic Skills Deficient.

The term “basic skills deficient” means, with respect to an individual;

(A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or

(B) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

Oklahoma’s WIOA Title I Program supports individuals with barriers to education, training, employment, and those with developmental and intellectual disabilities and individuals in need of rehabilitation services. Our motivation for more flexible assessment techniques is to assure that basic skills deficient individuals will be served.

For those individuals with severe low basic skills where more formidable testing methods may not be appropriate, or the testing method may cause undue stress, and no resulting benefit to the individual; we will allow for a prior assessment including visual observations of behaviors where appropriate; a review of basic math and reading skills through resources that provide proficiency benchmarks for specific grade levels such as K-12 worksheets and 1st through 12th grade math and reading material.

For example, an individual 14-24 years of age or older at assessment of basic skills is unable to read, write or compute mathematically on the grade level of a K-8th grader based on the testing instrument utilized such as a Grade 4 Level English book, and/or a Grade 5 Level Math book; or

is determined to not have the ability to fluently perform an occupational task such as adding or subtracting based on the assessment of basic mathematical skills in the exercise, or is unable to read the English text in the assessment tool.

This individual would be considered as basic skills deficient in math and English and meets the State definition. Under the States definition, basic skills deficient will also include a English Language Learner as defined in WIOA Section 203(7).

D. SINGLE-AREA STATE REQUIREMENTS

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).)

Not applicable

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

Not applicable

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

Not applicable

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.

Not applicable

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.

Not applicable

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.

Not applicable

E. WAIVER REQUESTS (OPTIONAL)

Oklahoma is not requesting any waivers at this time.

TITLE I-B ASSURANCES

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
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	Yes

The State Plan must include	Include
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;	
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 Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	66.7%	70.0%	66.7%	70.0%
Employment (Fourth Quarter After Exit)	66.0%	67.3%	66.0%	67.3%
Median Earnings (Second Quarter After Exit)	\$5,000.00	\$5,675.00	\$5,000.00	\$5,675.00
Credential Attainment Rate	65.5%	70.5%	65.5%	70.5%
Measurable Skill Gains	60.0%	61.0%	60.0%	61.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter)	75.0%	73.3%	75.0%	73.3%

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
After Exit)				
Employment (Fourth Quarter After Exit)	74.1%	70.5%	74.1%	70.5%
Median Earnings (Second Quarter After Exit)	\$7,371.00	\$8,360.00	\$7,371.00	\$8,360.00
Credential Attainment Rate	68.0%	75.0%	68.0%	75.0%
Measurable Skill Gains	62.0%	67.0%	62.0%	67.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	70.0%	73.0%	70.0%	73.0%
Employment (Fourth Quarter After Exit)	66.0%	71.0%	66.0%	71.0%
Median Earnings (Second Quarter After Exit)	\$3,200.00	\$3,650.00	\$3,200.00	\$3,650.00
Credential Attainment Rate	50.0%	61.3%	50.0%	61.3%
Measurable Skill Gains	59.0%	59.0%	59.0%	59.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

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 provide labor exchange services under the Wagner-Peyser Act through state merit staff employees. We do not anticipate any changes due to the flexibility staffing rule.

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

As the administrative agency for Wagner-Peyser, the Oklahoma Employment Security Commission (OESC) supports the professional development of staff. Training personnel, business services representatives, and program subject matter experts work together to meet the training demands of the workforce system customers, managers, and staff.

OESC understands the importance of continuous improvement and meets quarterly to determine training needs, a review of 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 Oklahoma Employment Security Commission (OESC) is a very active, involved partner in the delivery of services in the American Job Centers (AJC). In Oklahoma, both the Unemployment Insurance (UI) and Wagner-Peyser/Employment Services (ES) programs are administered by OESC. As an agency, they have approached service delivery to customers by cross-training agency staff, both ES and UI staff, as well as Partner staff, on these two major Federal programs.

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; and e) Failure to report for 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 of 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, reference material is provided to AJC Staff and One-Stop Operators and/or Managers to provide supplemental training to an integrated staff through weekly AJC 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 has twenty-seven (27) Centers – ten (10) Comprehensive centers and nineteen (19) Affiliate Centers, all part of the American Job Center network, which provide an array of career and training services as well as the best upfront information to file their initial Unemployment Insurance (UI) claim and provide meaningful assistance the first time a customer accesses the center.

Oklahoma continues its support of unemployed individuals by providing trained, knowledgeable, integrated staff members to help the customer through the claims filing process while still leveraging technology. OESC has transitioned all initial unemployment insurance claims to an online platform in an effort to ensure more meaningful assistance in provided through support staff throughout the America Job Centers in Oklahoma. Meaningful assistance applies in every scenario where we communicate and provide services to an unemployed individual:

1. Informing claimants of their right to an Appeal. This may also include showing the claimants where/how to file.
2. 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 OKJobMatch 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.
3. 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.
4. 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.
5. Informing the customer about their responsibility to keep all scheduled appointments and return all requested documentation.
6. 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 OKJobMatch notifications of available jobs.

7. 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.
8. Informing the customer about their responsibility to accept offers of suitable work.

For those claimants who are Limited English Proficient, staff use Language Associates Inc. to assist the customer during the claims filing process. OESC has also enhanced our Interactive Voice Response (IVR) system to include Spanish and Vietnamese translations. For those individuals who are deaf or hard of hearing, TTY services are also available.

The rapid reemployment of claimants and job seekers alike remains a focal point and OESC and its partners continue to strategize staff training opportunities and improvements on service delivery.

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 American Job Centers (AJC), Oklahoma provides Reemployment Services and Eligibility Assessment (RESEA) services to help Unemployment Insurance (UI) claimants and/or unemployed individuals return to work more quickly.

Reemployment Services and Eligibility Assessment (RESEA)

RESEA is an individualized process consisting of an introduction to the AJC and all available workforce system resources, a UI eligibility review, an assessment of a claimant's skills and career goals including any necessary transferable skills discussions, a discussion of job search strategies, the establishment of an individual reemployment plan, provision of job referrals, and follow-up appointments. This program addresses the "harder to serve/need intensive" category i.e. those with multiple barriers to employment needing a variety of assistive services to return to work. RESEA claimants have been identified as likely to exhaust UI benefits and unlikely to return to their previous occupation; therefore, they must be scheduled before receiving the 5th week of UI benefits. Additionally, RESEA also serves Unemployment Compensation for ex-service members (UCX) claimants. These reemployment services are provided in an effort to reduce the time a claimant will be paid UI benefits and increase the likelihood the claimant will attain self-sufficient employment.

As the administrator of the RESEA program, the Oklahoma Employment Security Commission (OESC) is currently making policy revisions with some changes that include: adding a UI work search review process, the flexibility to provide services to claimants virtually, replacing the AJC in-person orientation presentation with an online/virtual orientation and making use of an online Frequently Asked Questions (FAQ) list the claimants can access later, and referring all claimants to the appropriate programs according to their needs. To take advantage of the flexibility the grant offers and the new requirements OESC is in the process of launching a client-facing self-scheduling tool to enhance program delivery in a virtual environment. The UI customer is notified of their selection and provided 14 days to schedule and complete their RESEA appointment. The agency plans to conduct a soft launch of this program in the Fall of 2021. OESC is also in the process of conducting a formal evaluation of the RESEA program as mandated by the USDOL to determine the effectiveness of current interventions to reduce UI duration. The evaluation will be conducted over a 5-year time frame and the results will be utilized to update current intervention strategies.

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:

The Oklahoma Employment Security Commission (OESC) complies with the 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. As a natural extension, Labor Exchange services are provided by Wagner-Peyser staff to all UI claimants accessing the American Job Centers. In fact, there is a special emphasis placed on serving UI claimants via meaningful assistance and Reemployment Services and Eligibility Assessment (RESEA) activities to help connect claimants back to work as quickly as possible.

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. If a claimant does not comply with this requirement, benefits will not be awarded until the requirement has been met.

Claimants in Oklahoma must now file their initial claims online via the Oklahoma Network Initial Claims (ONIC) system; however, they may file their continued weekly claim to receive benefit payment by telephone via the Interactive Voice Response (IVR) system or online through both of these filing processes, claimants are instructed that they must register for work in OKJobMatch.com. This registration process requires the claimant to create a resume that includes adequate work history, methods of contact, and setting the resume to 'active.'

Oklahoma has enhanced its online services to include robust 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 on 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; 8) Change Tax Withholdings. 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.

Potential eligibility issues are identified based upon the claimants' response to questions during the initial application for benefits and the weekly benefit payment filing processes. Reemployment of claimants continues to be a priority for Oklahoma. As the administrator of the Unemployment Insurance program in Oklahoma, the Oklahoma Employment Security Commission (OESC) has modified and enhanced services to claimants to ensure the registration for 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 to include but not limited to; information of available services in Oklahoma Works American Job Centers, resume assistance, job referrals, job search workshops, work search review, and access to skills-based training. Regardless of the point of entry for the claimant, the end goal continues to be reemployment.

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 are integrating 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 be in need of a computer, phone, or fax.

These core services are available to everyone through the Centers, usually with limited assistance. In fact, 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 fill 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.

The latest data from the U.S. Department of Agriculture for Oklahoma shows a total of 592 migrant workers. However, O*Net Online projects a slight yearly increase in the Migrant Seasonal Farm Worker population, so that number may be slightly higher. Other sources estimate up to 7,500 migrant workers in Oklahoma. Locating and correctly identifying Migrant Seasonal Farm Workers (MSFWs) in the state continues to be a challenge.

Because of this, it is difficult to know the needs of the MSFW population, and difficult to get information to them that could help meet those needs. Typical needs of MSFWs are healthcare, education, employer requirements, rights, insurance, health & safety information, availability of adequate work clothing, and transportation.

Attempting to identify the MSFW population in Oklahoma is difficult for multiple reasons. They work the same hours the career centers are open and are typically only provided transportation to stores once per week for necessities or to conduct personal business. Employers are reluctant to encourage training or accept free training opportunities that are offered, out of fear of losing valued employees. MSFWs are also largely mistrustful of the government and reluctant to take time away from their jobs for training.

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 was obtained from the 2020 Oklahoma Agricultural statistical bulletin, which is issued annually each fall. The 2020 Oklahoma Agricultural statistical bulletin was published in October 2020. Also, information was used from the 2019 Oklahoma Agricultural statistics bulletin published in October 2019. Additional data was also obtained for this report from the United Fresh Produce Association, the National Agricultural Statistics Service, and the Census of Agriculture which is published every 5 years. Currently, the most recent data available from this census is 2017.

1. Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity:

According to www.netstate.com, Oklahoma’s top five labor-intensive crops are cattle and calves, hogs, broilers, wheat, and dairy products. While we have seen a small overall decrease in beef production, there has been a slight increase in poultry, hogs, and sheep/goats. Corn silage continues to steadily increase in 2020, up 7.69% while sorghum silage has grown 20% in 2020. Winter wheat production has shown a decrease of 5.45% from 2019 to 2020. Most production has seen a small decrease in Oklahoma.

CROPS	2019 PRODUCTION	2020 PRODUCTION
	1,000	
WINTER WHEAT	110,000,000 BU	104,000,000 BU
OATS	1,250,000 BU	495,000 BU
RYE	1,485,000 BU	728,000 BU
CANOLA	29,610,000 LB	12,240,000 LB
CORN, GRAIN	45,210,000 BU	43,200,000 BU
CORN, SILAGE	260,000 TONS	280,000 TONS
SORGHUM, GRAIN	13,260,000 BU	10,350,000 BU
SORGHUM, SILAGE	160,000 TONS	192,000 TONS
SOYBEANS	12,760,000 BU	16,200,000 BU
PEANUTS	57,400,000 LB	58,800,000 LB
COTTON	640,000 480LB BALES	636,000 480LB BALES
ALL HAY	5,935,000 TONS	5,364,000 TONS
ALFALFA HAY	615,000 TONS	684,000 TONS
ALL OTHER HAY	5,320,000 TONS	4,680,000 TONS
ALL CATTLE	5,300,000 HEAD	5,200,000 HEAD
ALL HOGS AND PIGS	2,200,000 HEAD	2,270,000 HEAD
ALL SHEEP AND LAMBS	50,000 HEAD	52,000 HEAD

Oklahoma’s weather patterns can be unpredictable on occasions causing planting and harvesting dates to vary during certain times of the year. The table below provides the best

approximation of the heaviest crop during the calendar year. Oklahoma typically has its last frost in mid-April and its first frost of the winter around Mid-October.

Oklahoma is most easily divided west and east with regard to 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.

CROP	PLANTING	HARVEST
Winter Wheat	Early Sep to Early Nov	June to Early July
Oat	Mid-February to Early March	June to Early July
Sorghum Grain	Mid-April to Mid-June	Mid-Sept through Mid-Nov
Sorghum Silage	Late April through Early July	Early Aug to Mid Sept
Corn	Late March to Mid-May	Mid-Aug to Late Oct
Soybeans	Mid- April to Mid-July	Mid-Sept through Nov
Peanuts	Late April to Mid-June	Oct to Nov
Cotton	May to Late June	Oct through Dec
Alfalfa Hay	Late Aug to Late Sept	Late April to Mid-Oct
Hay except Alfalfa		Late April to Late Aug
Canola	Early Sept to Early Oct	Mid-May through June
Rye	Early Sept to Mid-Oct	June

B. 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 the Oklahoma Prevailing Wage and Practices Survey, as well as the 2017 USDA Census of Agriculture, a majority of farms and ranches in Oklahoma are family-owned and operated with few, if any, hired hands. On farms and ranches where hired hands exist, they are predominantly local workers. The majority of Oklahoma farmers and ranchers have answered that they have had no issues finding local workers.

C. 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 widely known for its unpredictable seasons, which often requires fluidity in crop planning to make a profit. The western part of the state is more prone to drought than the wetter eastern part of the state. The last frost in the state is usually mid-April and the first frost is usually mid-October.

Farmers and ranchers in Oklahoma typically deal with a wide variety of weather-related events that can impact their planting or harvesting times, such as damaging storms, hail, tornadoes, ice, and snow. In October 2020 and February 2021, there were major ice storms, and in late April a historic hail event, although it was overall a light tornado season.

The COVID-19 pandemic has also had a major impact on farmers and ranchers in the state, who according to the Oklahoma State University Extension Center “...have had to balance supplying meat to near-empty grocery store shelves with worker safety.”

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

According to data supplied by WIOA Section 167 of the National Farmworker Jobs Program (NFJP) grantees and other organizations serving MSFWs in the state and/or federal data sources, Mexico is the predominant country of origin of MSFWs in Oklahoma, and most of these workers speak Spanish. Other farmworkers come from South and Central American countries whose primary language is Spanish but ranges from Vietnamese to Romani to Afrikaans. The latest data from the National Agricultural Workers Survey indicated that 69% of hired workers were born in Mexico, and 24% were domestic-born.

The latest data found is from the 2017 USDA Census of Agriculture, updated every five years. This shows that of 42,431 hired farmworkers in the state, only 592 are migrant workers. While low numbers such as this likely occur during the low season of employment. In an article published on May 13, 2021, the Rural Migration News out of UC Davis confirms that estimating farmworkers is difficult at best and even more so when you consider farmworkers who are also migrant workers. Other sources indicate varying numbers of migrant workers in the state as high as 7,500 coinciding with the peak season of employment, from April to June.

Despite an increase in agriculture technologies, agricultural employment is projected to show little or no change, despite increased demand for crops and other agricultural products. According to O’Net Online, Agricultural positions in Oklahoma are predicted to grow 2% for Agricultural Equipment Operators and 5% is expected for Farmworkers, Farm, Ranch, and Aquacultural Animals. This same source predicts a decrease of 8% for Farmworkers and Laborers, Crop, Nursery, and Greenhouse, as well as a 7% decrease in Graders and Sorters, Agricultural Products. During the COVID-19 pandemic, smaller farms that sell their products to consumers through venues such as farmer’s markets have gained popularity, and farmers at these operations may hire agricultural workers as an alternative to purchasing expensive machinery.

4. OUTREACH ACTIVITIES

Oklahoma currently has no registered true MSFWs in the state and is not designated as a significant state. This has been due, in part, to outdated definitions in www.okjobmatch.com. The website was recently updated to correct this issue, and training for local Workforce Centers is planned, with an emphasis on correctly identifying and registering MSFWs. The Oklahoma Employment Security Commission will continue to highlight training opportunities and MSFW rights, health, and safety information and will include the involvement of partner agencies in the services to MSFWs throughout the state.

Oklahoma is currently looking to fill three (3) Outreach Worker positions that were vacated over the last year. The main focus of the outreach workers will be to locate and contact MSFWs throughout the state on a part-time basis. Each outreach worker will be assigned to a section equal to one-third of the state and will be overseen by the State Monitor Advocate (SMA) to

ensure and provide an open forum of communication and data gathering to be done in a cohesive manner through the state. The outreach workers will assist the agency in identifying prospective MSFWs and target places where there are suspected populations of MSFWs and their families to ensure they receive the full range of employment and training services that are offered to non-agricultural workers.

Local offices and outreach workers will continue to seek and correctly identify MSFWs to ensure they are provided services that are qualitatively equivalent and quantitatively proportionate to services provided to non-agricultural workers.

The local offices will have information available at all events held for the public, such as job fairs. The outreach workers will provide materials about services and employment opportunities available at workforce centers, and direct their energies toward local businesses and community events that draw MSFWs and their families to schools, sporting events, shopping centers, stores, restaurants, libraries, etc.

Outreach workers are essential to locating, identifying, and communicating with farmworkers who cannot be reached through the normal intake process within the local Workforce Centers and One-Stop Centers.

Outreach Activities may include but are not limited to:

- Limited English Proficiency (LEP) group - The policy of OESC is to provide quality and timely language assistance services to customers with the LEP system. The Oklahoma Employment Security Commission (OESC) has the OKJobMatch database system which is enhanced with a variety of language options. The Oklahoma Employment Security Commission (OESC) has available bilingual staff available for translation when needed. There are brochures and posters visible and reachable to MSFWs as well as the general public.
- Placement of bilingual staff in Oklahoma Workforce Centers – OESC has placed Bilingual staff in high-volume offices or units (i.e., call center for unemployment) to assist Spanish-speaking customers. OESC continues to maintain relationships with agencies that may assist or who work specifically with the MSFWs.
- The Oklahoma Employment Security Commission's (OESC's) State Monitor Advocate (SMA) will work toward establishing new alliances with agencies that provide services to MSFWs. OESC's State Monitor Advocate will attempt to re-organize and recommence the Oklahoma Agricultural Outreach Group.
- The Oklahoma Employment Security Commission (OSEC) will continue to identify and provide increased literature and media outreach to the agricultural community. The OESC will continue to develop current informational packets for MSFW workers and for employers summarizing available resources and services that are available at workforce centers. The MSFW and Agricultural Employment Handbook are available upon request. The Oklahoma State Monitor Advocate webpage that was placed on the OESC agency website continues to be updated with current information for MSFWs, employers, and partner agencies. The Oklahoma State Monitor Advocate webpage contains information for the complaint process, safety, and other informational items that are also displayed. The State Monitor Advocate (SMA), Foreign Labor, MSFW webpages will continue to be reviewed and updated throughout the year as needed for informational changes and updates.
- Continued training to OESC and partner staff in Oklahoma Workforce Centers to help better identify MSFWs, their needs, and service requirements. A desk aid for staff to assist in the proper identification of MSFWs has been created and continues to be updated and distributed.

- Flyers, posters, brochures, and web-based informational materials are used for marketing purposes and to assist workforce centers and partner staff in identifying the MSFW population.
- The OESC webpage will continue to display all workforce center/local offices with the inclusion of available resources and services for each location. Handouts will continue to be developed for outreach activities, job fairs, and distributed at, (i.e., schools, sporting events, shopping centers, stores, restaurants, libraries, etc....) and other community events.
- The handouts will be also be distributed through outreach events and field visits. Oklahoma Workforce Centers will continue to display posters, flyers, brochures, and other informational materials in the reception area and on-center marquees. The Oklahoma Employment Security Commission (OESC) will continue to display information on the High School Equivalency Program (HEP) for the MSFW population which is administered by ORO.
- The Oklahoma Employment Security Commission (OESC), workforce centers and partner agencies staff will continue to work alongside ORO as they deliver services to the state where there is a MSFW population. The SMA and ORO continue to have a strong working alliance as they combine and plan activities to address and serve the needs of the MSFW community.

The SMA will develop new training modules and update existing training module materials throughout the year for OESC staff, outreach workers, workforce center, and partner agency staff. These modules will address regulatory requirements found in 20 CFR Part 653. The module design will address and cover center resources, services that impact agricultural employer/jobseeker contacts, job order requirements, and referrals to posted jobs in OKJobMatch that would be purposeful to the MSFW population. Training modules will also be developed and made available to center staff and partner agencies for identifying MSFWs, rights, complaints, unemployment insurance, and sexual harassment/human trafficking. The SMA will continue efforts to regenerate efforts with the WIOA Section 167 NFJP recipient and other agencies or organizations that hold a commitment to identifying and assisting MSFWs. The OESC will continue to use the OKJobMatch database system to secure the availability of job orders, as well as the identification of true MSFWs.

OESC will strive to revive the Agricultural Outreach Group and set up a structured platform of communication with organizations to address and identify the needs of MSFWs and to help, organize, facilitate and disperse existing services.

While the Memorandum of Understanding with ORO and the SMA was signed earlier in the year, there have currently been some staffing changes leaving the SMA position temporarily vacant. Once the position is filled, the MOU will be updated and filed with the OESC Legal Division, and a copy will be held in the SMA office. The SMA will continue to seek other agencies/organizations or advocacy groups that can assist in sharing information or facilitating training or assistance.

OESC continues to have Area Managers present and actively participating in WIOA Board meetings. OESC will continue the practice of contacting and involving other appropriate agencies/organizations/groups in the quest to bring together a consortium, within the limits of OESC's available resources, to service the needs of MSFWs.

Training modules for Outreach Workers, workforce center, and one-stop center staff will continue to cover core elements in accordance with federal regulations (20 C.F.R 651-658) and the WIOA, including the Unemployment Insurance (UI) program and UI eligibility that is designed by the Oklahoma Employment Security Commission (OESC) Training Division. The training is set to cover WIOA eligibility as related to Title I, program resources and available

services. Training modules are developed in conjunction with the Oklahoma Employment Security Commission (OESC) Workforce Center Managers, the OESC Training Division. Training modules include area outreach materials for employer contact and involvement. With the addition of related topics occurring, developed, and introduced by the State Monitor Advocate (SMA). Training will occur bi-yearly or more often as needed.

Outreach Workers will be provided training to benefit and expand their expertise, knowledge, and individual skill sets. Training will be at the state, regional, and national levels will be encouraged, as well as webinars and con-calls as opportunities arise. In-person classes, online videos, training materials, and tutorials are available for personal development and personal growth. On-site workshops and seminars are developed and offer professional development opportunities for staff which include a variety of topics. Workers will attend other Human Resource Development training classes that lead to an overall strengthening of the program. Outreach workers will complete all required quarterly safety and security training. Outreach Workers will be trained on the criteria and documents required for identifying MSFWs and tracking them in the OKJobMatch system.

Outreach Workers will have training available that will augment job performance by doing research, keeping up with technology, systems, processes, and learning about new developments in their field to improve existing skills. The SMA will continue to provide a variety of required and topical training for the outreach workers as budgetary resources allow.

As previously mentioned, there is a current MOU with ORO and the SMA in an effort to identify MSFW needs, and to facilitate needed outreach. The OESC will collaborate with other groups, associations, and organizations to identify, locate and assist MSFWs throughout the state of Oklahoma.

Due to the recent retirement of the Director of ORO Development Corporation, the state NFJP Partner, the SMA will work to establish a close working relationship with the new Director once one has been appointed. The SMA will also work to bring the Agricultural Outreach Group back together, to include representatives from the U.S. DOL and Oklahoma Departments of Labor divisions, the regional Mexican Consulate, USDA, Oklahoma Department of Agriculture, Food & Forestry, Department of Education, and interested H-2A and H-2B agents. OESC will continue to reach out to other agencies that are serving and identifying the ongoing needs of MSFWs across Oklahoma. The focus of the group will continue in the directions of coordination and communication in an effort to reach all agriculturally impacted employers and MSFWs.

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers

The Oklahoma Employment Security Commission (OESC) through One-stop Centers and Workforce Centers provide an array of re-employment and employment services for the MSFWs and employers. OESC ensures that the services offered to Migrant Seasonal Farmworkers (MSFWs) are "qualitatively equivalent and quantitatively proportionate" to the services provided to other job seekers. This means that MSFWs receive all workforce development services, benefits, and protections on an equitable and non-discriminatory basis (i.e. career guidance, testing, job development, training, and job referral) as required under the WIOA Title I. As mandatory by 20 CFR Subpart B, 653.101, through policy guidance, monitoring, and technical assistance, The Oklahoma Employment Security Commission (OESC) through Workforce Centers and One-Stop Centers will ensure all MSFWs have access to the same assortment of employment services, benefits and protections, as is provided to all non- MSFWs

The Workforce Centers and One-Stop Centers offer an array of Career and training services to MSFWs who come into our centers. When any customer uses our resources and registers

with OKJobMatch they are made aware of Career and training services that are available through our center. We offer these services to all customers and do not differentiate between MSFW and non MSFW customers. Employment services are provided by Workforce Centers and One-Stop Centers staff members along with referrals to our partner WIOA and Oklahoma Rural Opportunities (ORO) Development Corp. to introduce any career and training service programs that may interest a MSFW customer.

The Oklahoma Employment Security Commission (OESC) through Workforce Centers and One-Stop Centers will ensure that services provided are in accordance with federal regulations (20 C.F.R. 651658) and the Workforce Investment Act. In order to locate and to contact MSFWs who are not being attained by the normal intake activities conducted by the local Workforce Centers and One-Stop Job Service offices, the focus of the workforce delivery system will be to as follows:

- Increase the number of MSFWs participating in all labor exchange activities available
- Increase the number of agricultural employers using labor exchange services through outreach
- Promote the use of the Agricultural Recruitment System (ARS)
- Encourage MSFWs' transition to higher-wage jobs & permanent year-round employment
- Enhance partnerships with MSFW service providers
- Encourage full integration of MSFWs and partner agencies that serve them in the Workforce Centers and One-Stop Career Centers throughout the state of Oklahoma.

Information of available services will be taken to the MSFW population who is unable to come to the centers. Marketing center services at group meetings, in brochures, and on flyers and posters as a possible option for MSFWs to encourage them to visit the workforce center and one-stop centers in the area they work or live.

ii. How the State serves agricultural employers and how it intends to improve such services

The Oklahoma Employment Security Commission (OESC) through Workforce Centers and One-Stop Centers serve agricultural employers by providing an array of services to employers, including updating them on compliance with state and federal labor law posters. We make certain that agricultural employers have the most current posters, forms, and guides. The Oklahoma Employment Security Commission (OESC) through Workforce Centers and One-Stop Center staff also provides the following business services to Agricultural Employers:

- Assistance in recruiting domestic labor
- Matching workers' skills and experience to business needs and available positions
- Answering questions regarding recruiting and registering workers
- Referrals for labor laws and compliance issues; and labor market information
- The Oklahoma Employment Security Commission (OESC) through Workforce Centers and One-Stop Centers has center managers who are trained as housing inspectors. In addition to performing the housing inspections, the center managers become the contact for agricultural employers, and with the workforce centers and one-stop centers staff provide services, as necessary. Services include:
- Agricultural Recruitment system which includes local, intrastate, and interstate information and referral to other agencies.

- Tax Credit Programs
- Informational handouts
- Jobs fairs available
- Special and mass recruitments events

Career Service updates are given to outreach workers and can be posted at grocery stores, churches, and other MSFW gathering locations so they may become aware of available positions across the state. We expect these initiatives will help workers obtain jobs and businesses receive the labor supply essential at farms across the state. The Oklahoma Employment Security Commission (OESC) performs housing inspections. This ensures compliance and safety.

Workforce Centers and One-Stop Centers provide information to job seekers with agricultural experience about the available local agricultural positions. The FLC program helps employers with obtaining workers. Agricultural employers can also use OKJobmatch to list their job openings. The Oklahoma Employment Security Commission (OESC) promotes programs to help Justice-Involved clients obtain employment in the Agricultural and other fields. The Oklahoma Employment Security Commission (OESC) collaboration WIOA Title I program is available to assist with work experience programs and on-the-job training programs.

The Oklahoma Employment Security Commission (OESC) is continuing to expand and improve our services to our agricultural employers by conducting a statewide search of potential agricultural employees. Also, by contacting these job seekers with information on the positions available in the area.

We will increase collaboration with Workforce Development Boards to ensure their commitment to working with the MSFW. Contact will be done by the SMA.

Increase training for all center staff on the identification of MSFWs, ensure MSFWs are educated of their rights, take complaints and potential language service needs are met. The Agricultural Recruitment System (ARS) as a means for accurate placement of MSFWs in all agricultural jobs; particularly those outside of the Foreign Labor Certification (FLC) program's H-2A and H-2B job orders.

Development of a center practice that requires staff to pursue contact with those MSFWs, who are registered (typically through self-registration) but not engaged in programs or services, to ensure they are knowledgeable of what services are available to them. Policy and training will be developed by January 2022. Training will be ongoing.

Outreach workers will provide information about available services to the MSFW population that is unable to come to the centers. This will be done through marketing center services through events and the distribution of information materials to encourage MSFWs to visit centers near them. Outreach work field visits will be resumed to MSFW places of employment or communities to be planned as locations are identified.

Agricultural employer services are addressed through common employer services such as assistance with compliance of Federal, State, and local regulations; skill and proficiency testing; screening of applicants if required or requested; registration of OKJobMatch which includes job posting and resume searches; LMI; information on several incentive programs for hiring targeted populations; and Career Readiness Certification. There is specialized assistance in filling job openings through compliant job orders in OKJobMatch for Agricultural employers. Applicants are informed by Center staff regarding the conditions, duties, pay, etc. of these unique postings, and applicants are screened for meeting job requirements before being referred to the employer. For farmworkers or employers, presentations and technical assistance by outreach workers and/or compliance agencies is available.

The use of the Agricultural Recruitment System (ARS), providing preoccupancy housing inspections and assisting agents/employers with job posting requirements represents some other services provided. Training for field checks and apparent violations will continue to be part of the ARS training.

The Oklahoma Employment Security Commission (OESC) through Workforce Centers and One-Stop Center staff, the State Monitor Advocate (SMA), and Outreach Workers will coordinate outreach and marketing efforts to collaborate with partner agencies, agricultural community/ groups/associations/ organizations for a planned expansion of services available through programs. The Oklahoma Employment Security Commission (OESC)/ the State Monitor Advocate (SMA) will continue to ensure that, at a minimum, outreach activities must provide information about services available through the workforce center/one-stop centers, as well as the availability of referrals to employment, to training, programs, supportive services, assessments, counseling, other job-related services, and the employment service complaint system.

This procedure, in addition to the SMA website and outreach efforts, promotes the job service complaint system to both the farmworker advocacy group and farmworkers. Instructions on how to file a complaint are located on the Oklahoma Employment Security Commission (OESC) webpage. This information is visible to Oklahoma Employment Security Commission (OESC) staff, job seekers, and employers who then disseminate the information to other groups. Training is provided throughout the year or upon request.

A rudimentary summary of farmworker rights with respect to the terms and conditions of employment is also available through the Oklahoma Employment Security Commission (OESC), Workforce Centers, and One-Stop Center staff and partners.

The complaint system process is being monitored by the SMA through random desk reviews, onsite local office visits, and virtual office visits. When deficiencies are known, training is provided with clarification (through emails, conference calls or webinars, teams meetings). Outreach workers and their activity in work and community settings will also increase the marketability and increased familiarity of the complaint system. Continual development of outreach material will increase knowledge of the complaint system by providing information to employers and organizations who work with MSFWs.

The Agricultural Recruitment System (ARS) is promoted through the Oklahoma Employment Security Commission's (OESC's) website. The Agricultural Recruitment System (ARS) is used by the Workforce Centers and One-Stop Centers to demonstrate that the U.S. has enough workers to refer and fill the H2A job orders and prevent the displacement of U.S. workers. Employers must file an ETA-790 form and follow the process through the Foreign Labor Certification Unit to get their job order cleared and approved so the job order can go to the local offices for referral and job placement.

The Oklahoma Employment Security Commission (OESC), Workforce Centers, and One-Stop Centers staff work with employers to fill job orders and accurately match applicants to their job descriptions and skills requirements. Workforce Centers and One-Stop Center's staff are required to have training and become knowledgeable about the ARS and associated MSFW and agricultural employer topics. ARS information will continue to be promoted through flyers, posters, brochures, and attachments to our annual Wage and Hour surveys; email or mailing campaigns, and the OESC's webpage to those employers with agricultural NAICS codes.

The State Monitor Advocate (SMA) will identify and govern how to best coordinate limited resources to progress promotion of the Agricultural Recruitment System to employers and organizations within the state.

6. OTHER REQUIREMENTS

A. COLLABORATION

The State Monitor Advocate (SMA) serves as the state's hub for information sharing among the Oklahoma Works American Job Center and National Farmworker Jobs Program (NFJP) partners. The Oklahoma Employment Security Commission (OESC) has appointed a new SMA and renewed the agency's MOU with ORO Development Corporation, the NFJP partner, effective March 2022. The OESC will continue to foster relationships with partner agencies and other interested stakeholders through meetings, workshops, and seminars centered around the identification and enrollment of MSFW, outreach to the public, program services to participants, and the roles and responsibilities under the Employment Services Complaint System. The OESC and the SMA will work to strengthen existing partnerships and build new ones through robust information sharing and outreach targeting MSFWs and other agencies that serve this population.

B. REVIEW AND PUBLIC COMMENT

The Oklahoma Employment Security Commission (OESC) experienced some changes in key positions both before and after the COVID-19 Pandemic. In fact, those key positions were at the Executive, Division Director, and program levels and included the agency needing to shift resources due to pandemic claims processing. The State Monitor Advocate (SMA) has just recently been filled and as of March 2022, we've updated the Memorandum of Understanding with our National Farmworker Jobs Program service provider, ORO Development Corporation, who also underwent staffing changes at both the Executive and Managerial levels.

OESC Division Directors with experience in program administration developed the Agricultural Outreach Plan (AOP) in collaboration with Migrant Seasonal Farmworker team members, one of which was recently designated as the SMA. The plan was placed online for public comment and feedback was solicited from interested stakeholders including, but not limited to The ORO Development Corporation (NFJP service provider).

C. DATA ASSESSMENT

A review of the previous four years of data obtained from Oklahoma's Labor Exchange Agricultural Reporting System (LEARS) displays that the state of Oklahoma has not been fully meeting the required levels. This is due to outdated definitions and identifying questions in OKJobMatch, and a lack of available Outreach Workers. Oklahoma has recently addressed the issues with OKJobMatch, and is currently in the process of locating three bilingual staff members to perform the necessary outreach duties in order to locate and identify MSFWs. The new SMA will also hold training for local office staff to emphasize the correct identification of MSFWs that may visit local offices. Through monitoring, policy guidance, and technical assistance, the OESC will ensure all MSFWs are presented with the same range of employment services, protections, and benefits which include counseling, testing, and job referral services that are provided to other job seekers .

D. ASSESSMENT OF PROGRESS

A working relationship exists with ORO and workforce center partners to ensure coordination of efforts and to respond to the local needs of migrant and seasonal farmworkers. The MSFW program will promote Workforce Center and One-stop Center services available to employers by participating in employer conferences, workshops, and seminars that respond to the needs of the agricultural community in general and the migrant and seasonal farmworker population in particular.

Progress from the last plan has been made. This includes but is not limited to:

- Establishment of a more visible MSFW internet presence through the development and continued updates of an Oklahoma State Monitor webpage on the OESC website; This webpage & several related ones will be updated as information changes.
- Ongoing training to center staff with a desk aid for proper identification of MSFWs; Desk aids have been completed and are ongoing as needed.
- Improved partnership and developing a new MOU with our NFJP partner; Interaction between ORO and SMA will continue and discussion to ensure further coordinated outreach agreed upon.
- MSFW activity will become more apparent as outreach workers are identified and begin their duties, attending community-based events related to MSFWs or their communities.
- Identification of significant documents, informational materials, and other items used daily by our centers that need translation to Spanish, the primary non-English language identified; are being translated as needed.

Activities that are working and continue to be promoted through the Oklahoma Employment Security Commission (OESC) workforce centers and one-stop centers: the OESC will continue to educate about, explain, and promote the complaint system to the MSFWs and agricultural employers to ensure the utilization by both MSFWs and agricultural employers.

Marketing of workforce centers and one-stop centers as viable resources for farmworkers; this has been occurring through outreach activities and providing information materials to MSFWs or families.

Monitoring workforce centers and one-stop centers operations and the implementation of services to identify areas or practices requiring training and establishing training modules to train center staff and partners staff in the identification of MSFWs, services and programs needed; proper registration and follow-up of registered farmworkers, and the ARS system as a venue for all agricultural job orders placed and those requirements.

Development and distribution; informational materials continue advertising services available at workforce centers and one-stop centers.

Development of OESC MSFW policy and procedures has been completed and distributed to the workforce centers and one-stop centers. Workforce centers and one-stop centers staff have been trained on the new MSFW System Policy and Procedures.

OKJobMatch system to identify MSFWs in the state. SMA will continue to identify available MSFW information in Oklahoma to help elevate the misrepresentation and labeling of MSFWs.

E. STATE MONITOR ADVOCATE

The Oklahoma State Monitor Advocate (SMA) position at the Oklahoma Employment Security Commission (OESC) was vacant at the time the Agricultural Outreach Plan was written. OESC personnel at the Senior Staff level came together to develop this plan and it was reviewed and approved by other senior agency staff before it was presented for the public comment process. As we train and prepare the newly designated SMA in her new role, OESC is looking ahead and will ensure that the SMA has a good understanding of the responsibilities of the role but also helps prepare and subsequently approve the next plan update.

WAGNER-PEYSER ASSURANCES

The State Plan must include	Include
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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 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	Yes
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

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	59.1	59.1	59.1	59.1
Employment (Fourth Quarter After Exit)	61.0	61.0	61.0	61.0

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Median Earnings (Second Quarter After Exit)	5,900.00	5,900.00	5,900.00	5,900.00
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

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

A. ALIGNING OF CONTENT STANDARDS

The ODCTE Adult Basic Education 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 and Technical 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 actually 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 of a student is determined by the National Reporting System (NRS) approved standardized assessment scale scores (<http://www.nrsweb.org/>). All students are placed into an appropriate Educational

Functioning Level (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 or not 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:

1. Uniform measurement of learner gains that are aligned with the NRS educational functioning levels.
2. Consistent comparison of the success of programs in meeting state performance targets.
3. Consistent comparison of program data for performance-based funding.

Instructional purposes of assessment include but are not limited to:

1. Determining the instructional needs of individual learners.
2. Determining the effectiveness of instruction through learner gains.
3. Providing information regarding local program and/or statewide professional development needs.

B. LOCAL ACTIVITIES

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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—
 - 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
 - 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 Literacy activities under WIOA are authorized by the Oklahoma Department of Career and Technology Education. 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. 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 or.
- Integrated education and training that provide adult education concurrently and contextually for the purpose of educational and career advancement.

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 postsecondary 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 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.
- *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 Activities (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. Standards have been developed by the Oklahoma SDE that include English Language Arts, Mathematics, Science, Social Studies, and Personal Financial Literacy. The Oklahoma Academic Standards serve as expectations for what students should know and be able to do 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 secondary school diploma.

The ODCTE strives to serve more adult education students and serve those more efficiently to transition them as quickly as possible to postsecondary education and/or family-sustaining jobs. The 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. The ODCTE will conduct three competition for new grants to be awarded July 1, 2022. 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. Applications will be reviewed by the ODCTE to evaluate demonstrated effectiveness. Eligible provider applications that demonstrate effectiveness will then be reviewed by a review panel selected by ODCTE staff members. A rubric will be developed, and evaluation criteria will include the thirteen 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 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; 240
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 Workforce Development Areas by using demographic data for each of Oklahoma's 77 counties. This allocation for each AEFL Workforce Development Area will include the number of eligible individuals within the counties of each Workforce Development Area. 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 Workforce Development Area. Applicants will select

which counties that 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 an AEFL Service Area based on funding requested on dollars available.

Eligible providers will determine a budget for providing services in the Workforce Development Area(s) requested and the ODCTE will evaluate these budgets. Budgets should reflect counties which eligible providers plan to serve. Negotiations will occur when more than one eligible provider 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 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 amount received by eligible recipients will be held steady for two years.

After the two-year period, allocation amounts for each service provider will be determined using a formula that accounts for the eligible individuals in an ABE service area, performance of the service provider, and provider need.

The following factors may be utilized to calculate the allocation after the two-year hold steady period:

- Provider need.
- Total number of fundable students each program served in the hold steady period of up to two years. Fundable students are defined as meeting the following criteria:
 - Educational funding 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 a National Reporting System (NRS) the fiscal year.
 - A per fundable student dollar amount will be calculated by dividing the total number of fundable students in the state (two years prior to allocation year) into the seventy percent dollar amount.
- Program performance by each program two years prior to the allocation year. Program performance will be based on:
 - Meeting or exceeding the state's target goal percentage in each NRS educational functioning level.
 - 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).
 - Meeting or exceeding the state's target percentage of 60 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. Performance funding will be based on the average of two years of performance data. The 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.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

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.

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. 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 the Payne Learning Needs Inventory or other screening instruments, if it is deemed appropriate by the instructor.

Other institutionalized adults may include those in mental institutions, juvenile detention centers, 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.

The ODCTE has partnered with the Oklahoma Department of Corrections and has established 11 Skills Centers within correctional facilities that provide career and technical training opportunities to incarcerated individuals. Adult Education & Family Literacy is offered in most of these correctional facilities that also offer career and technical training programs. 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. The ODCTE will provide funds to correctional institutions and institutions that wish to provide services to criminal offenders and juveniles in detention centers. The ODCTE provides state funds that are used to fund the CareerTech 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 many of the correctional institutions.

During our fifty years of serving incarcerated offenders in Oklahoma, Skills Centers have evolved from a division with a few occupational training programs to a large school system with a multitude of programs and services for both adult and juvenile offenders. Skills Centers offers services in state correctional facilities, juvenile detention facilities and community correctional facilities.

To prepare offenders for successful transition, career and technical education, employability and life skills are integrated into this educational delivery system. Skills Centers 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 provides 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 works in conjunction with the Oklahoma Department of Corrections (DOC) 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 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 Corrections funding process will be conducted separately, and additional consideration will 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, 2022. 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 panel selected by the ODCTE. A rubric will be developed, and 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.

Eligible providers will determine a budget for providing services in the Workforce Development Area(s) requested and the ODCTE will evaluate these budgets. 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 amount received by eligible recipients will be held steady for two years.

After the two-year period, 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 after the two-year hold steady period:

- Provider need.
- Total number of fundable students each program served in the hold steady period of up to two years. Fundable students are defined as meeting the following criteria:
 - Educational funding 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 a National Reporting System (NRS) the fiscal year.
- A per fundable student dollar amount will be calculated by dividing the total number of fundable students in the state (two years prior to allocation year) into the seventy percent dollar amount.
- Program performance by each program two years prior to the allocation year. Program performance will be based on:
 - Meeting or exceeding the state’s target goal percentage in each NRS educational functioning level.
 - 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).
 - Meeting or exceeding the state’s target percentage of 60 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. Performance funding will be based on the average of two years of performance data. The 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. Funding method and considerations for Corrections will ensure equitable access and consideration for all eligible providers.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

1. Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.

ODCTE conducted an open competition for new grants awarded July 1, 2018. A new grant competition will take place and be awarded July 1, 2022. The grant application will address the thirteen considerations established in Title II. The competition will be open to all eligible providers. The grant application will contain the local application criteria listed in Section 223(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy. Applications will be reviewed by the local workforce development boards and ODCTE staff. A rubric will be developed and evaluation criteria will include the 13 considerations in 223(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. Each applicant will fill out the same application. This will ensure direct and equitable access to all eligible providers.

Funded IELCE programs will do the following: work with local Title I partners to identify in-demand occupations in their local areas, meet with local post-secondary and technical schools to develop a training course that prepares IELCE students for the identified in-demand career pathway, and have local adult basic education instructors plan a curriculum that integrates contextualized English literacy, civics educations, academic skills, and training-specific

vocabulary and knowledge. Furthermore, IELCE students will participate in workforce preparation activities in order to be prepared to enter unsubsidized employment upon completion of program. Furthermore, IELCE students will be assisted by local adult education staff and Title I partners to prepare for, find, and be placed in unsubsidized employment. Coaching by those individuals will continue after an IELCE student enters employment. This support will ensure students have a resource as they move forward on their career path.

The IET activities will align with the skill needs of industries in the state or regional economy. The adult education activities will ensure that there is contextualized learning that complements the IET activities. The training program, adult education, and workforce preparation activities will occur simultaneously, use occupationally relevant instruction materials, be of sufficient intensity and quality, and have a single set of learning objectives that identifies specific content in each of the required activities above.

ODCTE will monitor and provide technical assistance and support to IELCE funded-programs on an on-going basis. These activities will focus on ensuring that funded-programs are adequately and appropriately conducting an IELCE program as listed above.

2. Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

Funding method and considerations for IELCE will ensure equitable access and consideration for all eligible providers. The IELCE funding process will be conducted separately, and additional consideration will be given to how the applicant plans to integrate IELCE programming.

ODCTE conducted an open competition for new grants awarded July 1, 2018. A new grant competition will take place and be awarded July 1, 2022. The grant application will address the thirteen considerations established in Title II. The competition will be open to all eligible providers. The grant application will contain the local application criteria listed in Section 223(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy. Applications will be reviewed by the local workforce development boards and ODCTE staff. A rubric will be developed and evaluation criteria will include the 13 considerations in 223(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. Each applicant will fill out the same application. This will ensure direct and equitable access to all eligible providers.

The ODCTE will fund IELCE in conjunction with integrated education and training activities. Components funded within this program are adult education and literacy activities, workforce preparation activities, and workforce training. Funds for IELCE will be used for the cost of educational services provided to English language learners who are adults, including paraprofessionals with degrees or credentials in their native countries, that enable such adults 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. Funds will include the planning of and deployment of contextualized instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. Funds will be used 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. Funds will be used for occupationally relevant instructional materials and for occupational license testing. Funds will be used to help prepare for and provide assistance in placement in employment upon completion of the program.

3. 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, how to get promoted, 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 hard skills needed to be successful in their new occupations. Finally, program staff and Title I staff will assist students in job searching and the transition to employment. Staff will continue to coach and assist students even after employed to make sure students are thriving in their new jobs.

4. 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 concurrently and contextually with both, 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. Furthermore, 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 into local workforce development system partners. This co-enrollment will allow all WIOA partners to provide the unique services that each specialize in eliminating duplication. This will allow the participant to have improved access to activities leading to recognized post-secondary credentials including industry-recognized certificates, and portable, stackable credentials. Furthermore, co-enrollment increases the options for a worker's pathway to career advancement.

Furthermore, 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 and 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 phases 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

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.

ODCTE will use 12.5 percent of its federal allocation for adult education and literacy for statewide leadership activities. The four required activities are included below along with how the state will use leadership funds to carry out activities under section 223 of WIOA. The following state leadership activities will be conducted annually:

1. *Alignment of adult education and literacy activities with other one-stop required partners to implement the strategies in the Unified or Combined State Plan as described in section 223(1)(a).*

The implementation of strategies identified in the state plan and the development of career pathways to deliver access to training and employment services for individuals involved in adult education programs. ODCTE participates as a core partner with Oklahoma Works to develop and implement state-wide workforce initiatives. Our State Director participates in the Governor's Council for Workforce Development. ODCTE AEFL staff participate in the System Oversight Subcommittee. Representatives from ODCTE will participate on three additional committees lead by Oklahoma Works. As committee members, the ODCTE state staff participate in the planning of the Oklahoma Workforce Association Conference. ODCTE AEFL staff will participate in regional workforce boards. These meetings are used to establish policies and guidance for the workforce development boards in implementing these policies. Such policies will provide the guidance necessary in implementing career pathways and allowing individuals access to employment and training services for individuals in adult education and literacy activities. ODCTE will annually evaluate local and regional workforce development plans for alignment.

2. *Establishment or operation of a high-quality professional development programs as described in section 223(1) (a).*

Oklahoma may provide state administration funds annually for each AEFL provider to participate in high quality professional development of their choosing. The state will reimburse each provider for these activities. The state will also provide professional development utilizing conference calls, regional meetings, webinars, virtual meetings, and other means. ODCTE will offer year-round adult education professional development workshops to improve the quality of instructional programs for adult learners. Adult education teachers will be required to attend at least one professional development workshop during each 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. Professional development topics may 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
- Implementing a comprehensive family literacy program family literacy training
- Teaching English as a Second Language (ESL) in a multilevel ESL classroom
- Developing and implementing an Integrated Education Training (IET) program
- E-learning or virtual learning
- Online assessments
- Data quality assurance

- Financial training
 - Assessment of adult learners using the Tests of Adult Basic Education (TABE)
 - Utilizing LiteracyPro’s Information Management System, LACES
 - Technology training
 - Other Topics for Professional Development as identified by surveying Adult Education & Family Literacy providers.
3. *Provision of technical assistance to funded eligible providers as described in section 223(1)(c).*

ODCTE staff will meet regularly with eligible providers to determine technical assistance needs. ODCTE utilizes a tiered system of support to determine technical assistance needs for data management. Technical assistance will be provided to eligible providers and may include:

- - Assistance in the use of technology, including for staff training to eligible providers especially the use of technology to improve data collection efficiencies.
 - Pre/post-assessment and student performance data collection.
 - Utilizing LiteracyPro’s Information Management System, LACES
 - Assessment of adult learners using the Tests of Adult Basic Education (TABE)
 - Strategies and screening for adults with learning disabilities.
 - Implementing family literacy programs.
 - Development and distribution of instructional practices based on the most current and valid research available.
 - Student retention.
 - Budget and claims.
 - Student records.
 - Providing guidance to eligible providers as they fulfill their role as one-stop partners in providing access to employment, education, and training services.
 - Data management
 - Implementing work-based education programs.
 - Coordination with the local One-Stop Centers.
 - Integrating adult education and literacy activities with job training programs.
 - Promoting linkages with employers.
 - Other areas, as needed.
4. *Monitoring and evaluation of the quality and improvement of adult education activities as described in section 223 (1)(d).*

ODCTE will monitor the adult education and literacy activities through on-site, virtual or hybrid visits throughout the program year. Monitoring activities will ensure that valid and reliable student performance data is being collected and reported. It will also ensure that instructional

programs are being carried out in accordance with the approved applications. Regular fiscal reviews for all funded programs will be conducted. The ODCTE will follow its risk assessment policy and monitoring policy. Monitoring visits will be conducted to check student records and other data, support for the AEFL program by the organization, staff development, instruction and curriculum, testing, and other areas. Feedback will be used to improve future professional development activities, as well as assist the ODCTE in determining future professional development topics. Based upon monitoring findings, ODCTE will provide ongoing technical assistance.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE

Permissible activities of statewide significance which promote the purpose of the Adult Education and Family Literacy Act may also be supported as part of the State Leadership Activities. These may include such activities as statewide outreach to instructors, students, and employers; activities to promote high school equivalency (HSE) credentials; support for screening adults with learning disabilities; and activities to promote workforce adult education and literacy activities, including the development and implementation of IETs. ODCTE may assist in the development and implementation of a system to provide transitions from adult education to post-secondary education, including linkages between AEFL programs and career and technology education programs. Additional activities may include partnerships between statewide literacy coalitions and ODCTE, such as conferences, adult education teacher associations, and outreach.

F. ASSESSING QUALITY

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 Core Indicators of Performance as well as their ability to reach high standards related to Oklahoma's Indicators of Program Quality and the criteria for funding. Annual evaluation activities will include the following:

1. Performance results achieved on each of the federal and state Core Indicators of Performance will be compiled and compared to the 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 (MIS) which has been adopted for use statewide by Oklahoma's adult education and literacy programs. 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. ODCTE will build on the National Reporting System (NRS) pilot to identify strategies that local providers can use to obtain follow-up information in students who leave the program and obtain employment, retain employment or job advancement, enter post-secondary education or job training programs, and/or obtain 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.

2. On-site evaluations of at least four local programs will be conducted annually. 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 partners, if appropriate. The on-site evaluations will consist of an entry interview with the local program directors and one or more adult education teachers, a review of documentation which supports the Core Indicators of Performance, the Indicators of Program Quality, and the criteria for funding, visits to adult education classes, student interviews, and an exit interview. Based on the findings of the on-site evaluation, a final evaluation report detailing program strengths and recommendations for improvement will be completed for each program reviewed.

3. ODCTE will perform desk-top monitoring of all local adult education and Literacy programs throughout the entire fiscal year. Based on any potential non-compliant findings of the desktop monitoring, on-site evaluations will be conducted. Monitoring and evaluation of adult education and literacy activities will be conducted through program monitoring visits for each provider and ongoing technical assistance. Regular fiscal reviews for all funded programs will also be conducted. The ODCTE will follow its risk assessment policy and its new monitoring policy. Monitoring visits will regularly be conducted to check student records and other data, support for the ABE program by the organization, staff development, instruction and curriculum, testing, and other areas.

4. The development and implementation of professional development based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training will be provided throughout the state. An annual needs assessment will assist in determining PD offerings. The ABE division of the ODCTE will evaluate the professional development through informal and formal surveys and student data to evaluate effectiveness. The surveys utilized will assist the ODCTE in evaluating its professional development activities by allowing feedback from eligible providers. This feedback will be used to improve future professional development activities as well as assist the ODCTE in determining future professional development topics.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

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	Include

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
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

APPLICANT'S ORGANIZATION	Enter information in this column
Oklahoma Department of Career and Technology Education	
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
Lee	
Denney	
Interim State Director	
Lee.Denney@careertech.ok.gov	

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

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.

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.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	34.0%	34.5	36.0%	36.0
Employment (Fourth Quarter After Exit)	36.0%	36.5	38.0%	38.0
Median Earnings (Second Quarter After Exit)	\$3,900.00	\$3900.00	\$4100.00	\$4100.00
Credential Attainment Rate	24.0%	24.0	27.0%	27.0
Measurable Skill Gains	41.0%	41.0	41.0%	42.0
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

A. INPUT OF STATE REHABILITATION COUNCIL

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF

CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN
DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

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 assure services are of high quality and lead to the employment of individuals with disabilities within the state of Oklahoma.

The ORC acknowledges and commends the efforts and flexibility of the Oklahoma Department of Rehabilitation Services (OKDRS) toward proactively serving its clientele during the COVID-19 pandemic. The dedication and commitment of the Counselors and all the DRS Staff during this challenging time is a prime example that you can overcome any obstacle with determination.

ORC also appreciates the collaborative efforts and communication between the Agency and the Council; we look forward to continuing a positive relationship and promoting increased and meaningful employment opportunities for individuals with disabilities.

In 2021, ORC collaborated with the OKDRS Process Improvement (PI) Unit and hosted a total of three Virtual Focus Groups that gathered professionals from different agencies and fields of expertise to review the 2017-2020 Statewide Needs Assessment report. The participation in the session was very positive, and a final document with the compiled notes of all three sessions was shared with the OKDRS Executive Team and the Council.

The ORC also reviewed the results of the 2020 OKDRS COVID-19 Client Impact Survey that the PI Unit conducted in the Fall of 2020.

Council Recommendation

The ORC will use the Focus Groups notes and survey results mentioned before to identify a primary recommendation based on its function to review, analyze, and advise the Agency regarding the performance of its responsibilities.

Recommendation 1: Increase opportunities for Transition Age Youth Training

The ORC is aware of the Agency's efforts to expand its Pre-ETS services; however, many rural areas don't have programs in place that could provide Soft and Hard Skills training to students. In order to increase these services, the Council recommends the OKDRS partner with the local Community Rehabilitation Program Service Providers (CRP) to create more opportunities for students to improve their communication skills and provide guidance on possible issues, like schedule conflicts or work absences.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND
RECOMMENDATIONS; AND

The DSA concurs with the State Rehabilitation Council's input and recommendation to increase Pre-ETS services by partnering with local Community Rehabilitation Program Service Providers (CRPs). Opportunities to replicate an existing DSA partnership and career exploration contract with Central Technology center are currently in progress. The Central Tech program currently operates in various rural area schools in the Oklahoma Central Tech district. The DSA is hoping to expand this partnership with the Statewide Career Tech system that could establish additional CRP providers for Pre-ETS specifically in rural areas and serve more students with disabilities. The SRC's partnership is vital to the DSA to expand public awareness of disability issues, disability related events and promoting the services the DSA can provide. The DSA continues to maintain a cooperative, productive and interactive relationship with the Oklahoma SRC. The DSA appreciates the Council's collaboration and partnership to continually improve relationships with consumers and bring awareness to how quality Vocational Rehabilitation services impact Oklahomans with disabilities, their communities and state.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

The DSA did not reject any of the State Rehabilitation Council's recommendations.

B. REQUEST FOR WAIVER OF STATEWIDENESS

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

The DSA is not requesting a waiver of statewideness.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

This is not applicable.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

This is not applicable.

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

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 employment. The DSA agrees to provide payment of up to \$52,500.00 upon satisfactory performance for establishing new-employment related programs for people with severe mental illness who are eligible to receive assistance through the DSA and other services outlined in the agreements

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

Oklahoma ABLE Tech (ABLE Tech) (Oklahoma's AT Act Program)

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.

Memorandum of Understanding: 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).

Scope of Work: The DSA is leading the Oklahoma Workforce System towards enhanced accessibility. The DSA initiative of 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.

DSA Responsibilities: The DSA agrees to provide payment for satisfactory performance of services outlined.

Partner Responsibilities: Oklahoma ABLE Tech will:

- Continue outreach to other System Partners such as Oklahoma Career and Technology Education and OSU OKC;
- Provide technical assistance to the Oklahoma Office of Workforce Development (OOWD) regarding technology in its existing and possible new digital properties to ensure that Oklahoman's with disabilities can fully access all workforce resources provided by it's website. Content and Applications on the website are designed to connect employers, employees and job seekers to information and programs that help build Oklahoma's workforce.
- Provide technical assistance to the Workforce Office regarding technology accessibility of a new website for the Oklahoma Works initiative to ensure that Oklahomans with disabilities can fully access all workforce resources contained on the website, which is designed to connect employers, employees and job seekers to information and programs that help build Oklahoma's workforce;
- Continue with creation of employment-related tips and fact sheets;
- Under Oklahoma Workforce Development Issuance #11-2020, the Access for All Star Accessibility Framework is now in place to help to guide Workforce boards around the 221 State. This guidance implements the Star Accessibility Framework Rubric as a methodology for evaluating physical, technology and programmatic access across the workforce board areas. The Star Rubric provides area staff and partners with a series of benchmarks. Benchmarks align with a star rating currently on a scale of 1-5. Benchmarks for technology accessibility are mixed in with benchmarks for customer service and outreach activities. Those two areas are where board areas and partners most often use technology to interact with job seekers. The goal is to help areas and partners to have a model based on continuous improvement rather than a strict failure or pass approach.
- Continue to contribute content and topics to the Course Catalog that contains training materials that will assist workforce boards and partners gain mastery in the various dimensions of the Access for All effort. This includes Customer Service, Outreach and Physical accessibility. ABLE TECH will author training content in the Adobe learning environment recently licensed by the Office of Workforce Development.
- Provide ad hoc training and technical assistance to agency Partners under WIOA as needed.
- Present the TechAccessOK Conference - the seventh in a series of annual technology accessibility conferences for web developers, policy administrators, purchasers, etc., to assure public accessibility of OK agencies, higher education institutions and the career and technology education centers;
- Oklahoma ABLE Tech will continue to use the Popetech enterprise accessibility testing tool with appropriate web accessibility assessment projects. The tool allows ABLE Tech to create and repeat automated scans on hundreds of web pages and can use this tool to monitor progress over time.

- Continue to explore integrating technology accessibility into higher education curriculum possibly with Rose State College and/or others.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

No interagency agreement reached at this time.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

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 and the Southwest 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.

Southern Plains Treatment Center, Oklahoma Children and Youth Coalition, Oklahoma Department of Human Services, Oklahoma Office of Juvenile Affairs

In FY 22, The DSA has partnered with the above entities in order 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 within the STPS and OKCYC jurisdiction in order to increase youth opportunities for successful transition into adulthood. The DSA will assist to identify potential SPTS and OKCYC youth and provide a staff member who will serve as direct liaison with all parties and work closely with the DSA Transition Coordinator.

5. 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 administrator of the Services to the Blind and Visually Impaired or a representative designated by the administrator serves on the executive committee of the Oklahoma State Use Program. Currently, this committee position is held by the contract monitor for non-medical vendors to the DSA whom engage in a strategic role that encourage vendors to increase competitive integrated employment, develop relationships and outreach and review data for potential improvements. 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.

D. COORDINATION WITH EDUCATION OFFICIALS

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-

EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY
DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE
STUDENTS

The DSA maintains a formal interagency agreement with the State Educational Agency (SEA) as well as relationships at the local level with LEAs. 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.

(a) **Options for developing the Individualized Plan for Employment (IPE).** The VR counselor will provide the eligible individual, or the individual's authorized representative, in writing and in appropriate mode of communication, with information on the individual's options for developing the IPE. (1) The required information will include the following:

(A) information on the availability of assistance, to the extent determined to be appropriate by the eligible individual, or authorized representative, from a qualified VR counselor in developing all or part of the IPE, and the availability of technical assistance for this purpose;

(B) a description of the required content of the IPE;

(C) as appropriate:

(i) an explanation of agency requirements for client participation in cost of services;

(ii) additional information requested by the individual or authorized representative;

(iii) information on the availability of assistance in completing DVR/SBVI forms required in developing the IPE;

(iv) For cases involving Mental Disorders and Obesity, treatment must be incorporated as a service in the IPE, in accordance with DSA policy. **1**

(D) a copy of a DSA publication addressing client's rights and responsibilities.

(2) For cases in an open priority group, the IPE must be completed and signed as soon as possible, consistent with the needs of the individual, but not more than 90 calendar days following the eligibility determination, unless the individual or the authorized representative and the VR or SBVI counselor jointly agree to an extension of time of a specific duration. **2** The 90-day time frame for development of the IPE will be applied from the date a closed priority group is reopened.

As of October 1, 2019, the DSA has updated transition and pre-employment transition policies.

Overview of transition from school to work services

Transition services is a coordinated set of activities for a student that promotes movement from the public schools to post-school activities. The Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act use the same language to describe transition services and their purpose. No break in required rehabilitation services will occur for eligible students exiting the secondary school when a case has been opened while in high school. The transition process is outcome based, leading to post-secondary education, vocational training, 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. The goal of the Transition from School to Work Program is to help eligible individuals with disabilities make the transition from school to work in order to function as a productive member of society.

The Transition from School to Work Program is implemented through a cooperative agreement between the DSA and each participating local secondary school district, private school, charter school, home school organization and Career and Technology Education Center, through an MOU with the State Department of Education. The DSA Transition Coordinator acts as the liaison with the State Department of Education, and provides statewide coordination and technical assistance for the Transition from School to Work Program.

Transition services must be based on the individual student's needs, taking into account the student's preferences and interests. Transition planning will include, to the extent needed, services in the areas of:

- instruction
- community services;
- employment and other post-school adult living objectives, including job skill training available through vocational-technical schools;
- acquisition of daily living skills and a functional vocational evaluation;
- supported employment services can be initiated during the final graduating semester of high school; and
- other needs specific to the individual.

The Transition from School to Work Program is based upon effective and cooperative working relationships between the Special Education Section of the State Department of Education, the DSA, and the Local Educational Agency. Each agency retains responsibility for providing or purchasing any transition service that the agency would otherwise provide to students with disabilities who meet the eligibility criteria of that agency [34 CFR 300.520].

Subminimum Wage for Youth with Disabilities

DSA must provide documentation in collaboration with the local school district of specific services to youth ages 14-24 if those individuals are known by the DSA to be seeking subminimum wage work. This documentation must be provided as soon as possible but no later than 45 days after services are completed, or 90 calendar days, if additional time is necessary due to extenuating circumstances which should be interpreted narrowly.

The documentation must include the following:

- Pre-Employment Transition Services provided by the school and/or DSA as applicable;
- Application for DSA where they are found eligible or ineligible;
- Youth had an approved IPE with a competitive integrated employment goal;
- Youth with a disability was unable to achieve the employment outcome specified in their IPE and has a closed case with DSA;
- Youth received career counseling, and information and referrals from the DSA to other Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports to enable the individual to explore, discover, experience, and attain competitive integrated employment.

Pre-Employment Transition Services

- (a) **Students with a Disability.** Vocational Rehabilitation (VR) must collaborate with local educational agencies (LEAs) to provide, or arrange for the provision of, Pre-

employment Transition Services (Pre-ETS) for all students with a disability in need of such services.

- (1) A "Student with a Disability" as defined in Oklahoma is ages 16 through 21 and eligible for and receiving special education or related services under an Individualized Education Program (IEP); or an individual with a disability for purposes of Section 504 (individual does not need to have a 504 plan to meet the definition requirements).
- (2) An individual as young as 14 years old may be considered a "Student with a Disability" if Pre-ETS is determined necessary by the IEP team.
- (3) The definition of "Student with a Disability" applies to all students enrolled in educational programs, including postsecondary education programs or other recognized education programs, so long as they satisfy the age requirements. The definition is inclusive of secondary students who are homeschooled, as well as students in other non-traditional secondary educational programs.
- (b) **Required Activities.** 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:
 - (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 is provided in an integrated environment to the maximum extent possible.
 - (3) Counseling on opportunities for enrollment in comprehensive transition or postsecondary 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.
- 3. (c) **Delivery of Services.** Pre-ETS may be delivered in collaboration with school districts/LEAs 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
 - (d) **Considerations under Order of Selection.** VR must continue to provide Pre-ETS to students with disabilities who were receiving such services prior to being determined eligible for VS and are placed in a closed category.
 - (e) Pre-Employment Transition Coordination.
 - (1) District office staff 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.
- (5) acquisition of daily living skills and a functional vocational evaluation;
- (6) supported employment services can be initiated during the final graduating semester of high school; and
- (7) other needs specific to the individual.

The Transition from School to Work Program 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. Each agency retains responsibility for providing or purchasing any transition service that the agency would otherwise provide to students with disabilities who meet the eligibility criteria of that agency [34 CFR 300.520].

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. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

The DSA finalized an SEA agreement on July 1, 2018. 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); 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 the VR services or transition services in general; and
3. input on presentation materials, handbooks, data collection and reporting, and as requested by the SEA.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

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 at the age of 15 so services can be in place by the age of 16.

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, 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 at the age of 15 1/2 so services can be in place by the age of 16.

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 postsecondary 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, Office of Juvenile Affairs, Oklahoma Parents Center, Oklahoma Family Network, Oklahoma Autism Network, Down Syndrome Association of Oklahoma, 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 (NCED, OU), as well as local education agencies 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, 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 I Jobs, WOW!, 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.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

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 any and 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 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., a student may wear a hearing aid, have chronic health issues, such as asthma, leukemia, diabetes, suffer from depression, bipolar, and anxiety).

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

The DSA will interact 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 will utilize 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.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Community Rehabilitation Service Providers

DSA has contracts with private non-profit, for-profit, and government Community Rehabilitation Service Providers (CRPs) of Supported Employment and other employment programs for individuals with significant barriers to employment. CRPs request the opportunity to provide Supported Employment, employment and retention (i.e. short term job coaching), job placement, JOBS (short-term placement), work-adjustment training, employment support and transitional employment services for DSA job seekers. DSA approves contracts based on pre-established criteria, including acceptable levels of payment for outcomes achieved.

DSA will continue to increase employment CRPs to meet the needs statewide focusing in rural areas, by initiating a customized employment contract within designated areas across the state. The Employment Support Services Unit (ESS) educates potential CRPs and DSA field staff of available contracts. The list of contracts and CRPs is available on the DSA intranet.

Centers for Independent Living

The DSA maintains a cooperative relationship with the Centers for Independent Living (CILs). The DSA encourages the CILs to provide informative training programs to the DSA field staff to access services available through the CILs. The DSA remains committed to working with the Statewide Independent Living Council (SILC) to improve relationships between the CILs and DSA.

Initiatives include:

- Educate DSA field staff about services available from CIL's.
- Encourage the CILs to communicate with the DSA field staff to determine other services that could be created and provided by the CILs to the DSA.
- Encourage CIL's to market their services to DSA field staff.
- Survey DSA field staff about CIL usage and needs.
- Improve communication between the SILC and DSA.
- Find and/or develop services that will enhance the independent living concerns for consumers.

- Market these services to the DSA's field staff and consumer service professionals for inclusion in case services and plans.
- Continue to educate the 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 in major SILC and CIL meetings where services are discussed and planned: i.e., creation of the state plan for Independent Living.
- DSA (administration, accounting, and legal) will meet annually (or as needed) with the SILC Executive Board to address issues and difficulties.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

DSA enters into contractual agreements with CRPs for the provision of Supported Employment services. Assigned staff continues outreach activities in an attempt to recruit new CRPs.

Under the new section 511, the determination of individuals who may benefit from employment services, the DSA has developed contracts with CRP to provide Trial Work Services to establish the ability to benefit from employment services.

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 the long-term ongoing supports. DSA has maintained an MOA with DDS since 1989. Under the MOA, the HCBW is also utilized to provide pre-vocational services.

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

The DSA has formalized a Business Services Program with the 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.

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 to ensure the workforce system is relevant and useful. Further, specialists always ensure consumers with disabilities are included in the talent pool delivery system.

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.

Programs & Services

The need to broaden DSA employment services to the business community and DSA job seekers is evident by the lack of soft skills and actual work experience required by hiring entities. In order to address the deficiency among job seekers, DSA counselors will become active in remedial learning activities to enhance the ability of DSA job seekers to find meaningful employment opportunities. The following initiatives will become a part of DSA services.

- Job Clubs
- Job Search Tools
- Interpersonal Skills
- Resume Development
- Cover Letter Construction
- Interviewing Skills
- Mock Interviewing
- Appearance
- Internship and Work Experience and Training Opportunities

DSA has ongoing collaboration with State agencies and the following additional entities:

- Oklahoma Manufacturing Alliance (OMA)
- Oklahoma Works-WIOA Core Partner Programs
- U.S. and Oklahoma Small Business Administration
- USDA Rural Development
- Business Advisory Council
- Chambers of Commerce
- Regional Economic Development Partnerships
- Local Economic Developers

- Oklahoma State Regents of Higher Education
- Governor’s Council for Workforce and Economic Development
- Oklahoma American Job Centers
- Oklahoma Centers of Excellence

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

The DSA works with businesses to identify opportunities for youth and students with disabilities to prepare for employment through activities, such as job shadowing, internships (paid and unpaid), paid work experiences, summer programs, guest speakers, mock interviews, and career fairs. The DSA Business Services Coordinator works with the DSA Transition Coordinator to continue efforts to strengthen opportunities for youth with the businesses across the state.

The DSA provides specific training on topics related to the transition of high school students with disabilities to life after high school, emphasizing the Workforce Innovation and Opportunity Act (WIOA) Pre-Employment Transition Services Five Required Areas, education/training, employment, independent living, and self-advocacy. The DSA provides a variety of work experience programs across the state in which youth, starting at age 16, can gain specific work skills and receive training on independent living and self-advocacy. The DSA has established School Work Study contracts with over 300 schools in Oklahoma, providing students the opportunity to work part time up to 15 hours per week in the school district or in the community. Other DSA programs that provide youth the opportunity to gain work related knowledge and skills are: BEST, STEP, Career Exploration, Work Adjustment Training, Camp WOW, Project SEARCH, Tech Now, VIBE, ACE Academy, Opportunity Orange-IDD Self Advocacy Training and STEM camps. School Work Study was impacted by roughly 1.5 million dollars beginning March 2020 due to COVID as students weren’t able to work in the community due to fear and business closures.

The Pre-ETS collaboration with the DSA, the Oklahoma State Department of Education Special Education Services (OSDE) and The National Center for Disability Education and Training, University Oklahoma Outreach (NCED, OU), as well as local education agencies in Oklahoma make Pre-Employment Transition Services (Pre-ETS) available to high school students with disabilities. Currently there are seven Pre-ETS specialists serving over 125 schools in the State of Oklahoma to provide youth with opportunities to gain work related knowledge and skills.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

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. DSA implemented a customized employment contract which can be utilized by individuals to achieve employment. Increased education and in-service with contractors has occurred to encourage contracts with both the DSA and DDS to ensure a more streamlined access to competitive integrated employment opportunities.

The DSA participates in the Value Based Payment Champions Stakeholder meetings with DHS, DDS, Health Care Authority and community providers to collaborate on ways to provide services to those who are ready for Customized Employment. The group discusses transportation, extending payment for stabilization for VBP's, ways to distribute and gather stakeholder input and develop options to incentivize business for partnering with the group. Additional expertise is included as needed regarding Medicaid eligibility while working and/or Social Security benefit counseling.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

Developmental Disabilities Services (DDS) of the Oklahoma Department of Human Services (DHS)

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.

Initiatives include:

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.

Provide regular written reports to DSA Executive Staff to keep them informed of current field issues discussed at the monthly meetings.

DSA Programs Field Representatives serve on the Developmental Disabilities Advisory Council. DSA Employment Support Services (ESS) staff and State level Transition Staff participate on the Employment First Alliance, which has a national goal of increased competitive integrated employment by 50% in the states. As a result of the Employment First Alliance, the Oklahoma operates under the Employment First Law.

DSA ESS staff and State level Transition Staff participate on the State Employment Leadership Network (SELN) - DSA ESS staff 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. Many issues and challenges are brought forth with a wide range of experts to assist the DSA and DDS in resolving and achieving their goals.

The DSA Statewide Transition Coordinator will work 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 will work with DDS staff to ensure CRPs and staff at each agency is provided ongoing training and consultation required by WIOA for any youth with a significant disability hired at subminimum wage. The partners will also ensure the required reviews take place according to WIOA to ensure every opportunity for achieving full competitive integrated employment.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

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.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

The DSA is committed to maintaining Comprehensive System of Personnel Development (CSPD) standards as set forth in section 101 of the Act. The DSA maintains a complete data system that facilitates the analysis of current and future personnel needs and resources. Data is continuously collected and updated allowing for retrieval of information to determine the DSA's profile of success in relation to the CSPD Plan. Staff are required to provide updated educational and professional certification/licensure information whenever there is a change. The accuracy of this information is verified during the CSPD annual review.

The DSA maintains a counselor to job seeker ratio of 1 counselor per an average of 79 job seekers; DVR average is 87 and SBVI average is 42. The DSA will continue to focus on appropriate caseload size by ensuring services are provided to eligible individuals with disabilities who actively participate in the vocational rehabilitation program leading to competitive employment.

CURRENT POSITIONS FOR DSA:

Division Administrators=2

Field Coordinators=3

Programs Manager = 21

Programs Field Representative = 13

VR Specialist — Counselor = 96

VR Specialist — Vocational Evaluator = 6

Assistive Technology Specialist = 8

Rehab of the Blind Specialist = 14

Specialist on Deaf/Blindness = 0

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

Listed are the current vacancies needing filled to adequately serve the DSA's job seekers. The numbers indicated are and continue to be based on historical and projected turnover rates.

Field Coordinator—Current Vacancies =2

Programs Manager — Current Vacancies = 2

Programs Field Representative — Current Vacancies = 1

VR Specialist —Counselor — Current Vacancies = 24

VR Specialist —Vocational Evaluator — Current Vacancies = 1

Assistive Technology Specialist — Current Vacancies = 2

Rehab of the Blind Specialist — Current Vacancies = 1

Specialist on Deaf/Blindness — Current Vacancies = 1

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE 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.

Listed are the number of personnel projected vacancies over the next 5 years. The numbers indicated are and continue to be based on historical and projected turnover rates.

Programs Manager = 3

Programs Field Representative = 2

VR Specialist — Counselor = 20

VR Specialist — Vocational Evaluator = 3

Assistive Technology Specialist = 2

Rehab of the Blind Specialist = 3

Specialist on Deaf/Blindness = 1

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

There is one institution of higher education in Oklahoma that prepare vocational rehabilitation professionals by awarding Masters of Science Degrees with Vocational Rehabilitation Counselor emphasis. This program at Langston University is recognized by RSA as a historically black college/university (HBCU).

This program 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.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

The number of students enrolled in the Masters of Science Degree program with Vocational Rehabilitation Counselor emphasis at Langston University = 124.

III. 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.

The number of students graduating from the Masters of Science Degree program with Vocational Rehabilitation Counselor emphasis from Langston University = 52.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

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 Project Coordinator for Diversity Management position that focuses on recruitment of individuals with disabilities and others of minority backgrounds.

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

3. PERSONNEL STANDARDS

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

The DSA requires and follows the Comprehensive System of Personnel Development (CSPD) standard that was set in 1999 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.

At the request of the Commission for Rehabilitation Services, 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:

Vocational Rehabilitation Specialist

- Education and Experience requirements: 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. 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 recognizes the importance of maintaining collegial relationships with professional organizations whose missions relate to empowering individuals with disabilities. The goal and activities listed below are the efforts to aid in this area.

GOAL

Expand relationships with professional organizations

ACTIVITY

- Support state, regional, and national professional organizations by:
- Staff attendance at events
- Encouraging staff to become members of their professional organizations
- Assisting organizations to hold their events in Oklahoma

As a strategy to increase recruitment and retention of a diverse professional counselor staff from traditionally underrepresented and underserved populations, the DSA has assigned a Project Coordinator position for national diversity recruitment of CSPD qualified staff. The Project 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 Project Coordinator discusses the State of Oklahoma's low cost of living, the potential benefits contained in the State's employee compensation package and the State of Oklahoma's Carl Albert Public 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 Project Coordinator will engage 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 Project 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.

The DSA point of contact impacts diversity issues within programs, such as, Section 121 Oklahoma Tribal Vocational Rehabilitation Programs, Consortia of Administrators for Native American Rehabilitation, Inc. (CANAR), state and local Chambers of Commerce, city councils, Hispanic Chambers, Legislative Black Caucus and community-based rehabilitation programs.

To ensure Vocational Rehabilitation Specialist positions have an adequate background to successfully enter the profession, DSA requires the following minimum qualifications:

- Education and Experience requirements: 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.

4. STAFF DEVELOPMENT

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, 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

Bi-annually a comprehensive needs assessment is performed to afford continuing educational and in-service opportunities for the DSA professional and paraprofessional staff. From this assessment, a staff development plan is formulated to address those needs. The goals and activities associated with staff development are detailed below.

GOAL

Provide opportunities for increasing individual knowledge, skills, and abilities

ACTIVITY

Activities have been provided to staff in areas of:

- AutismTransition
- Ethics
- Workforce Partnership
- Professional Conferences
- Deaf/HOH
- Assistive Technology
- Leadership
- Diversity related conferences
- Counselor Academies
- Job Development

- Mental Health and the impact of Mental Illness on the rehabilitation process
- Core competencies training for managers, including Crucial Conversations, Crucial Accountabilities, and 7 Habits for Managers, Speed of Trust

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

To round out a complete program of providing the most up to date information in the field of vocational rehabilitation, research and details of significance are disseminated to all professional and paraprofessional staff. The Agency 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 is presented.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Services to the Deaf and Hard of Hearing Unit (DVR)

Services for the Deaf and Hard of Hearing is a statewide program that holds thirteen positions to address needs for persons with hearing loss. The Programs Manager supervises five counselor positions plus three rehabilitation technicians in offices located in both Oklahoma City and Tulsa. The counselors in these positions serve Oklahomans with hearing loss statewide. In addition, two other programs within the unit include the Interpreter Certification and Resource Center (ICRC) and the Interpreter Services Program. The ICRC is the certifying body for interpreters in Oklahoma, as well as monitoring and maintaining a registry of Interpreters. 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. The DSA employs a Staff Interpreter that interprets for both staff and consumers, in addition to the contract interpreters.

Hispanic Community Outreach

- Continue membership in local Hispanic Chambers of Commerce
- Continue participation with Hispanic Expos and other outreach activities around the state
- Use and ongoing review of current marketing materials — magnets and CDs in Spanish
- Continue support of Spanish translations of English forms and documents used by counselors and programs
- Continue to maintain Spanish Hotline
- A Hispanic counselor is involved in developing a job club curriculum along with the Transition Coordinator for one of the high schools that serves predominantly Hispanic students.
- Hispanic Chamber of Commerce — new employment contract on Job Placement, Employment and Retention, and Supported Employment to serve Spanish speaking job seekers.
- SAVE Program — inter—governmental information service initiative which verifies the immigration status of benefit applicants. The SAVE Program has access to immigration status information from more than 100 million records contained in the Department of Homeland Security databases. By determining the immigration status of benefit

applicants, SAVE helps authorized agencies ensure that only entitled applicants receive federal, state or local public benefits and licenses.

- Spanish Speaking Interpreter- can be used statewide for counselors in rural areas, as well as, the Metro areas. The Interpreter can translate forms, applications, plans, etc. into Spanish so consumers and family members of consumers are able to know what they are reading and signing. The Interpreter also travels to outlying offices to interpret for meetings between consumers and Spanish speaking families of consumers. Once forms in Spanish are understood, completed and signed they are translated back into English to be entered into the AWARE system to capture information.

Foreign Language Translation and Interpreter Services

To ensure effective communication with all members of the public, including applicants and eligible individuals with disabilities, the DSA utilizes a statewide contract with Foreign Language Translation and Interpreter Services to provide a variety of language services including, but not limited to bilingual oral interpretation, bilingual written translation, and American Sign Language Interpreting.

6. COORDINATION OF 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. Through the DSA commitment with the Oklahoma Transition Institute (OTI), trainings for local educational agencies (LEA) and vocational rehabilitation counselors will assist with plans in coordinating CSPD activities. The Transition Coordinator also conducts annual training with all staff providing transition services, as well as quarterly calls about transition, distribution of transition newsletters, and in-person or virtual small group training regarding IDEA, IEPs, and other school documentation.

J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

Findings from the 2017-2019 Statewide Needs Assessment indicated that soft skills training and interview skills development are a significant need of those with the most significant disabilities. There is also a need for more Supported Employment, Employment and Retention, and job placement specialists in rural areas.

Transportation remains a significant need across the state. Specific transportation problems include:

- Lack of service in areas
- Expense
- Inconsistency in services
- Drivers not waiting the allotted time for client pickup.

In 2020, the DSA conducted a survey of delayed, open-case, and successfully closed cases to determine how Covid-19 was affecting their employment or search for employment. Highlights included, 60% of delayed and 67% of active case client respondents are worried about working around other people because of Covid-19. At the time of the survey, 62.07% of respondents to

the successfully closed case survey reported they still had the same job as when their case closed. Of those that lost or left their jobs, 55.17% reported it was due to Covid-19

B. WHO ARE MINORITIES;

An estimated 24.0% of Oklahomans with disabilities belong to a minority racial group, including American Indian or Alaska Native (7.9%) and Black or African American (7.1%). DSA FFY 2019 demographics show that 10.0% of clients are American Indian while 17.7% of clients are Black or African American. Understanding the geographic distribution of our minority populations is also important. The majority of Black or African American Oklahomans reside in Oklahoma City or Tulsa (55.1%), as well as 47.1% of those who identify as Hispanic or Latino. Only 11.9% of those who identify as American Indian or Alaska Native reside in Oklahoma City or Tulsa. There are an estimated 29,248 working age Native American or Alaska Natives with a disability living in Oklahoma, of which 47.0% reside in Congressional District 2 (comprised mostly of rural Eastern Oklahoma).

The DSA reviewed statistical data, hosted focus groups and surveyed staff to assess any unmet needs of individuals who are members of minority communities. The surveys/interviews conducted for the CSNA surfaced these needs and concerns:

- Continue outreach programs targeting both Hispanic and Native American individuals with disabilities. Outreach to other civic groups that target the needs of minorities should also continue.
- Focus outreach to Native Americans in Congressional District 2, which contains the largest number of working age (18-64) Native American or Alaska Natives with a disability.
- Recommend hiring Native American staff to assist in service provision, specifically in Congressional District 2.
- Make Spanish language training available via the educational payback program and promote the training to current VR and SBVI employees to encourage increased Spanish language skills amongst the staff.
- Future job announcements should be advertised to Hispanic, Native American, and other minority outreach organizations in hopes of increasing applications from a diverse job pool.
- Continue to encourage co-trainings and meetings between OKDRS and Tribal VR staff.

The DSA co-serves American Indian clients via partnerships with Tribal VR programs, and it is essential due to cultural aspects that the Tribal VR programs can provide. The DSA serves Hispanic clients in Oklahoma via our Hispanic unit. In addition, staff continue to work through the Oklahoma Transition Institute to expand information for parents of Hispanic youth with disabilities.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

In collaboration with the SRC, the DSA held focus groups to obtain qualitative information. Based on the last assessment, research was focused on rural counties that were identified as being underserved. Despite active DSA programs to serve SSI/SSDI recipients, focus group attendees reported there is a family disconnect and fear regarding the loss of benefits. This fear results in the parents of youth with disabilities being resistant to services that are employment oriented.

Those in need of supported or customized employment in some rural areas of the state also face a lack of CRP vendors in remote areas, including southeastern Oklahoma. Needs were identified

for more employer outreach to address accessibility issues with employer application methods, additional cooperation between schools and DSA counselors in the setting of appropriate career goals for youth with disabilities and making sure IPE and IEP goals are in-line prior to graduation.

In rural areas, there is a gap in service when serving the homeless populations and those that lack transportation. This is a result of missing auxiliary services that are available through other agencies and/or programs in Oklahoma City and Tulsa. In addition, transportation is a service gap that affects individuals with disabilities not just in rural areas, but across the state.

The 10 counties where the DSA was serving the lowest percentage of the target population for services were Cimarron, Jefferson, Beaver, Adair, Delaware, Ottawa, Love, Roger Mills, Texas, and Craig (2.74% to 9.44%). The counties are dispersed around the state but are predominately located in three areas, the northwest corner including the panhandle, the northeast corner, and south-central Oklahoma. The DSA was serving 22.03% of the target population for possible service statewide.

The ten counties with the highest percentage of the working age population with a disability were Marshall, Pushmataha, Sequoyah, Johnston, Haskell, Jefferson, Delaware, Pittsburg, Choctaw, and Craig (25.49% to 20.60%). These counties are located in eastern and south central Oklahoma. Three counties, Jefferson, Delaware, and Craig, are in the top ten for prevalence of disabilities among the working age population but are also in the ten counties where the DSA is reaching the lowest percentage of the target population. Overall, the ACS data indicates that individuals with disabilities living in Congressional District 2 are more likely to have poorer outcomes than individuals living in the other Oklahoma congressional districts, including the lowest disability employment rate, highest percentage living in poverty, and the highest percentage with less than a high school diploma.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

OKDRS compared our client data to data from Workforce and it was determined that for Program Year 2020, 8% of OKDRS clients were co-enrolled with the Title 1 and Title III programs through Workforce (W.I.O.A. Annual Report, 10/1/2020).

Feedback indicates that the W.I.O.A. partners need more open communication and training to improve client co-service, including disability etiquette training. To address this, the Access for All Star Accessibility Framework is now in place to help to guide Workforce boards around the State. This guidance implements the Star Accessibility Framework Rubric as a methodology for evaluating physical, technology and programmatic access across the workforce board areas. The Star Rubric provides area staff and partners with a series of benchmarks. Benchmarks align with a star rating currently on a scale of 1-5. Benchmarks for technology accessibility are mixed in with benchmarks for customer service and outreach activities. Those two areas are where board areas and partners most often use technology to interact with job seekers. The goal is to help areas and partners to have a model based on continuous improvement rather than a strict failure or pass approach. This initiative will have an accompanying Course Catalog that contains training materials to assist workforce boards and partners to gain mastery in the various dimensions of the Access for All effort. The training content includes areas of Customer Service, Outreach and Physical accessibility

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

During the 2018-2019 school year, there were 37,389 students between the ages of 14 and 21 on an Individual Education Plan (IEP) in public school districts in Oklahoma. Statewide OKDRS was serving 1,751 or 4.68% of students on an IEP as clients. Statewide, in February of 2019,

OKDRS had contracts with 58.7% of public high school districts in Oklahoma. The OKDRS transition team and counselors continue to reach out to school districts to encourage them to provide work-study services through a contract with OKDRS. Work study participation declined during the 2020-2021 school year due to Covid-19 and distance learning.

Geographically, 68.42% of African American or Black students ages 14 to 21 on an IEP attend school in Oklahoma or Tulsa counties, while 55.08% of Hispanic students ages 14 to 21 on an IEP attend school in Oklahoma or Tulsa counties.

The DSA is providing services to students and youth, including Pre-ETS services to potentially eligible youth, in a number of ways, including, via contracts with the University of Oklahoma and Central Technology Center, through Counselor outreach and instruction, STEM Camps, Project Search, Building Employment Skills for Today (BEST) summer program, Visually Impaired & Blindness Empowerment (VIBE) training, school work study, through Community Rehabilitation Providers, and through partnerships with other programs/agencies, including NSU Riverhawks.

New and upcoming partnerships include OSU IDD – Opportunity Orange for IDD youth, Sooner Works, and Tulsa Tech CERT Culinary program.

Studies and focus groups indicate one of the biggest service needs is for soft skills training focused on communication with supervisors/employers and reasoning skills.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

The DSA conducted the Employment Support Services 360 analysis that surveyed the CRP providers, the DSA staff who work with CRP providers, and the DSA consumers that were served through CRPs. As a result of the analysis, DSA needs were identified for improvement in the areas of collaboration with CRP vendors to ensure vocational goals match the skill levels of clients to place job seekers in positions that match their vocation goal, additional vendor training regarding disability types and billing and/or paperwork and the need for CRPs to have more employer contacts and providers in rural areas. CRPs requested more training opportunities from the DSA, including benefits training regarding SSI/SSDI. Consumers who were served by the CRPs reported a need for ADA and sensitivity training for some CRP employee but expressed an overall appreciation for the patience of the job coaches and reported that the services boosted the client's confidence in their ability to work. The majority of clients served by CRPs reported their job was a good fit (80.5%) and 77.8% reported they were happy with the job with a median wage reported of \$9.00.

As of October 15, 2021, OKDRS has contracts with 38 Community Rehabilitation Providers, 36 with supported employment contracts. Some rural regions of the state have either no CRPs or only limited availability to provide services to OKDRS clients.

3. 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 THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

The DSA with input from the SRC and the State Department of Education, conducted a public needs assessment that focused on the needs of youth with disabilities. Services with the highest perceived need were soft skills training, internship opportunities and other types of vocational training and employment experiences. Needs for greater parental involvement/support, development of independent living skills and additional work-related experiences for transition aged youth were also identified. Only 33.3% of DSA and partner agency staff believe current opportunities for work-related experiences are adequate to meet the needs of students with disabilities.

OKDRS is providing services to students and youth, including Pre-ETS services to potentially eligible youth, in a number of ways, including, via contracts with the University of Oklahoma and Central Technology Center, through Counselor outreach and instruction, STEM Camps, Working on the Wichitas Summer Job Camp, Project Search, Summer Transition Employment Program, and through Community Rehabilitation Providers. In addition, the OKDRS Transition and AWARE teams have held five meetings around the state to help assist counselors with new requirements under W.I.O.A., including the documenting of actual services, educational goals, and measurable skills gained. The meetings also sought to increase transparency and counselor knowledge of the new contract pre-ETS services and increase outreach to schools that are not currently collaborating with OKDRS to serve students with disabilities. Tribal partners were invited to attend the meetings.

Our Transition team works closely with the Oklahoma State Department of Education's Special Education staff to coordinate transition services under the Individuals with Disabilities Education Act. The 11 counties where OKDRS was serving the lowest percentage of students on an IEP were Alfalfa, Beaver, Greer, Harmon, Johnston, Kiowa, Love, Adair, Jackson, Ottawa, and Leflore (0.0% to 1.3%). Local school board level barriers sometimes inhibit the ability of the DSA to provide coordinated transition services.

K. ANNUAL ESTIMATES

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

In 2018, the American Community Survey, U.S. Census Bureau, estimated 326,949 Oklahomans age 18-64 had disabilities which is 14.2 % of working age population who may be eligible for VR services.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

The number of eligible individuals estimated who will receive services in the VR Program for FFY 22 equals 8,500 and FFY 23 equals 9,000.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The number of eligible individuals estimated who will receive services in the Supported Employment Program for FFY 22 equals 500 and FFY 23 equals 500.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

The estimates are for FFY 22

Title I, Part B, Priority Group 1 = 3,825

Title I, Part B, Priority Group 2 = 4,250

Title I, Part B, Priority Group 3 = 425

Title VI, Part B = 180

Estimates for FY 23 are:

Title I, Part B, Priority Group 1 = 4,050

Title I, Part B, Priority Group 2 = 4,500

Title I, Part B, Priority Group 3 = 450

Title VI, Part B = 180

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

The estimates per year are for FY 23.

Title I, Part B, Priority Group 1 = 1350

Title I, Part B, Priority Group 2 = 1500

1 Title I, Part B, Priority Group 3 = 150

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

Title I, Part B, Priority Group 1 — Estimated Funds = \$9,653,034 (Average Cost of Services = \$3,520)

Title I, Part B, Priority Group 2 — Estimated Funds = \$9,057,684 (Average Cost of Services = \$3,991)

Title I, Part B, Priority Group 3 — Estimated Funds = \$1,545,104 (Average Cost of Services = \$5,869)

Title VI, Part B — Estimated Funds = \$300,000 (Average Cost of Services = \$3,866)

L. STATE GOALS AND PRIORITIES

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

The goals and priorities have been jointly developed with the Oklahoma Rehabilitation Council (SRC). DSA participates in regular SRC meetings and has designated staff who participates on the following SRC committees:

- Executive Committee- Outreach to businesses and disability organizations to educate on DSA programs, services and activities
- Program and Planning Committee: Data and Findings of customer satisfaction surveys and state performance accountability measures/assessment
- Policy and Legislative Committee: Public hearings, client success stories
- Transition committee: Participation on the Oklahoma Transition Institute: collaboration on the statewide needs assessment on assessments of individuals with disabilities for transition career services and pre-employment transition services, including services under IDEA.

The DSA Administration and Committee representatives participate with the SRC in their annual strategic planning process to jointly develop each committee's objectives and goals. As objectives and goals are met through the committees work, the reports of progress are provided to the entire SRC council during their quarterly meetings where all council members have an opportunity to inform the goals and priorities of the DSA. The SRC also collaborates in drafting and revision of agency policy development, and meets regularly with the DSA Administration.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

The DSA divisions of Vocational Rehabilitation (DVR) and Services for the Blind and Visually Impaired (SBVI) have identified the goals and priorities in carrying out the VR and Supported Employment programs for PY 2022 and PY 2023 .

Goal 1: Deliver quality opportunities for employment, independent living and economic self-sufficiency to Oklahomans with disabilities

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)
- 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)

Goal 2: Services to Students and Youth with Disabilities

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.

Goal Area 3: Create and leverage partnerships to maximize resources that reflect the needs of consumers with disabilities

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.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

In coordination with the ORC, the goals and priorities were developed utilizing the recommendations from the 2017-2019 comprehensive statewide assessment findings. Refer to the Statewide Assessment section for a more detailed discussion of 2017 CSNA findings pertaining to the Goal Areas and the strategies associated with each.

Statewide Assessment Status:

- The DSA is in the data collection phase of the next Statewide Needs Assessment. Estimated completion date and distribution for the report will be September 30, 2022.
- The 2017-2019 Assessment was completed in September, 2019.

B. THE STATE’S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

The State Rehabilitation Council (SRC) and VR partnered in the development of the goals and priorities by utilizing findings from the 2017-2019 needs assessment. The state goals and priorities for the VR and Supported Employment programs are centered on continuing to implement WIOA as well as continuing efforts to develop effective and efficient strategies which assist in the successful outcomes of individuals with disabilities. Monthly performance review meetings are held to review available resources that will allow for the VR waiting list to be reduced, increase outreach to transition students and develop strategies to ensure performance goals will be met.

The DSA is continuing to collect, report and have submitted proposed expected levels of performance in PY 2022 and PY 2023 for the following performance indicators:

Employment (Second Quarter after Exit)

Employment (Fourth Quarter after Exit)

Median Earning (Second Quarter after Exit)

Credential Attainment Rate

Measurable Skill Gains

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

The DSA and State Rehabilitation Council (SRC) partnered to host a focus group session in May 2021 for the Needs Assessment. One focus group session was hosted by the SRC and open to the public. It was attended by SRC committee members, employees at other state agencies, career techs, non-profits, and OU. The DSA is utilizing this feedback to continue to develop future goals and priorities in partnership with the SRC and participating in strategic planning sessions with the SRC.

M. ORDER OF SELECTION

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

The DSA operates under an Order of Selection with all priority groups closed for FY 23. Policy reflects the need for order of selection, priority group definitions, implementation, closing and opening of priority groups, continuity of services and information and referral services.

Order of selection

1. **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 SBVI services. The Department consults with the Oklahoma Rehabilitation Council regarding the:
 - need to establish an order of selection, including any re-evaluation of the need;
 - priority categories of the particular order of selection;
 - criteria for determining individuals with the most significant disabilities; and
 - administration of the order of selection.
2. **Priority groups.** It is the policy of the DSA 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 SBVI 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:

- **Priority Group 1.** Eligible individuals with the most significant barriers to employment. A most significant barrier is one that includes a mental or physical disability resulting in serious limitations in three or more functional capacities and can be expected to require multiple services over an extended period of time.
- **Priority Group 2.** Eligible individuals with significant barriers resulting in serious limitations in at least one, but not more than, two functional capacities and can be expected to require multiple services over an extended period of time.
- **Priority Group 3.** Eligible individuals with disabilities not meeting the definition of individual with a significant barrier.

3.Implementation. Prior to the start of each fiscal quarter, or when circumstances require, the DSA Director will determine in which priority groups new Individualized Plans for Employment will be written and initiated. The Director may restrict the writing and initiation of new Individualized Plans for Employment within a priority group to cases having eligibility dates falling on or before a specified date providing that all consumers in higher priority groups are being served. Considerations in making this determination will include, but not be limited to, the projected outcomes, service goals, expenditures, and resources available for each priority group. Projected costs and resources for each priority group will be based upon costs of current Individualized Plans for Employment, anticipated referrals, availability of financial resources, and adequacy of staffing levels. A projection of budgetary constraints and/or the lack of staff to serve eligible individuals indicates the current basis upon which the determination to open categories is made. The agency has requested and continues to seek additional appropriations for state match from the legislature. Fully matched federal funding by the state will allow for the agency to address and implement solutions regarding staffing and expanded client services in the form of opening priority groups during FFY-2023. The Director will implement actions under the order of selection through written notice to DVR and SBVI staff. The written notice

will specify the implementation date of the action and direct DVR and SBVI staff on how to handle cases by priority group and application date. DVR and SBVI staff will inform each eligible individual on their caseloads of the priority groups in the order of selection; of the individual's assignment to a priority group; and of the individual's right to appeal that assignment.

4. 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 or part 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 all or part of closed priority groups are opened, staff will contact individuals on the waiting list to develop and implement their Individualized Plans for Employment using the priorities in Paragraphs (1) - (3) of this Subsection:

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.

5. 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.

6. Information and referral services. 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.

B. THE JUSTIFICATION FOR THE ORDER

There are two reasons regarding the justification for the order of selection; budgetary constraints and/or the lack of staff to serve eligible individuals. As the ability to manage the pandemic expands, the challenges faced by the program remain the same in the form of State match and staff but have also expanded to staffing of providers. Applications are on the rise as consumers are now beginning to exhibit less reluctance to seek services and employment. The agency has requested and continues to seek additional appropriations for state match from the

legislature. Fully matched federal funding by the state will allow for the agency to address and implement solutions regarding staffing and expanded client services in the form of opening priority groups during FFY-2023.

C. THE SERVICE AND OUTCOME GOALS

The service goals per year for FFY 2023 are:

For Priority Group 1:

Number of individuals to be served = 1056

Outcome goals successful closures=528

Outcome goals unsuccessful closures=528

For Priority Group 2:

Number of individuals to be served = 1200

Outcome goals successful closures=600

Outcome goals unsuccessful closures=600

For Priority Group 3:

Number of individuals to be served = 144

Outcome goals successful closures=72

Outcome goals unsuccessful closures=72

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

The time for which these goals may be achieved each year for FFY 2023 are:

For Priority Group 1:

Average days between plan signature and closure = 892

For Priority Group 2:Average days between plan signature and closure = 1,057

For Priority Group 3:

Average days between plan signature and closure = 1,473

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

The DSA serves eligible individuals with the most significant disabilities and barriers to employment first. When all priority groups are open and it is determined there is a need to implement Order of Selection, the first group to close is priority group 3, then priority group 2, and last priority group 1. If all three groups are closed, the first one to open is priority group 1, then priority group 2, and last priority group 3.

The waiting list is reviewed monthly by program, fiscal and administrative staff to determine the current level of existing resource capacity. The goal is to be able to clear priority group 1 monthly and if possible to reduce the waiting list for priority groups 2 & 3. Releases from the waiting list are based on priority group ranking and applications with the earliest date are removed first.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS,
REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC
SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

The DSA is not exercising the option to serve those in need of immediate job saves. The DSA offers job retention, post-employment services, and information and referral services to eligible individuals who require specific services and/or equipment to maintain employment. 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. 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 development system in Oklahoma. No IPE will be written to provide such services to these individuals.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603
OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

DSA will continue to provide opportunities for Oklahomans with the most significant barriers to employment to enter competitive integrated employment through the use of funds received under Title VI, part B supplemented by Title I, part B to purchase time—limited Supported Employment services. Title I funds are used for services prior to job placement and Title VI funds are used for supported employment services, including extended services for youth, following placement. The DSA purchases services from qualified CRPs through contracts based on established rates for services.

Under state contracting laws, new contracts are established when requested by a CRP that meets minimum qualifications. DSA has contracts with private non—profit, for—profit, and government CRPs of Supported Employment and other employment programs for individuals with significant barriers to employment. Contracts are paid on an outcome basis. The contracts emphasize quality service at both the individual and contract levels.

Through payments at the completion of each milestone, multiple opportunities are created for the individual and the DSA counselor to assure that a quality service has been delivered and that competitive integrated employment has been achieved. Contracts also emphasize controlling average cost of service per individual, while providing payment incentives for difficult to serve individuals in these categories: individuals with felony conviction, high school students classified as severely emotionally disturbed, individuals with HIV/AIDS, or individuals who are legally blind, deaf or deaf—blind. A wage incentive is provided 90 days after case closure to CRP's who assist individuals with obtaining employment with hourly wages at or above the Oklahoma average wage determined annually by the Oklahoma Employment Securities Commission (OESC)

There are no restrictions on the types of disabilities served through the contracts, although the majority of individuals served continue to be those with intellectual disabilities or serious mental illness as a primary diagnosis. Although most CRPs serve a diverse population of individuals with the most significant barriers to employment, mental health CRPs continue to serve exclusively individuals with serious mental illness.

Mental Health CRPs have the option of providing Supported Employment. DSA and the Department of Mental Health and Substance Abuse Services continue to collaboratively pursue

strategies for improving services and enhancing service capacity for individuals with serious mental illness. One of the strategies is a pilot project in partnership between the DSA and the Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS). This contract is intended to provide Individual Placement and Support (IPS) services to individuals with serious mental illness or co-occurring mental illness and substance abuse disorders who have not achieved competitive integrated employment or for whom competitive integrated employment has been disrupted or intermittent. IPS services can be provided to out of school or at risk youth aged 16 or older, high school seniors in their final semester, and adults aged eighteen (18) or older. Contractors eligible to provide services under this contract have been identified as ODMHSAS contracted providers located in Cleveland County and Oklahoma County only. Under this contract, youth under the age of 16 are referred to the Department of Mental Health Services and counseled on all available resources that don't require the expenditure of VR funds. Due to complications from COVID-19 pandemic, outcomes for this pilot were slow for 2020 and 2021. The DSA will continue this pilot project in FY 22 in hopes of continuing to strengthen the collaborative relationship between IPS and VR. Out of thirteen available IPS teams there are currently two IPS teams participating in this VR Pilot project: Hope Community Services Inc. (HCSI) and Red Rock.

In our continued effort to provide outreach to increase the number of Rural Employment CRPs, DSA distributes informational marketing material regarding the contract process statewide in hopes to increase services and meet the employment needs of individuals with disabilities in the rural areas of the state. Collaborative efforts and partnerships with DDS and ODMHSAS assist in this effort to increase providers across the state.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

Extended services are a continuation of ongoing support services provided to the individuals with the most significant disabilities. After stabilization is achieved, and up to 24 months of onsite training and supports are provided, the team identifies the individuals need and develops a plan for the transition to extended services. An additional 48 months of extended services are available to be provided by the DSA to youth or until a youth reaches age 25, whichever occurs first.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

Customized Employment Services Project

Memorandum of Understanding: The DSA entered into a contracted agreement with qualified CRPs, known as the Contractor.

Scope of Work: This is a project to provide Customized Employment Services and/or other employment services to individuals in Priority Group 1 with the most significant disabilities. Some of the other employment services are available to individuals in Priority Group 2 with significant disabilities. This contract is intended to meet the requirements of WIOA. Career Exploration and Internship services are optional and can be used with individuals in Priority Group 1 or 2, receiving CE, SE or ER contract services. Onsite Supports and Training and Extended Services for Transition (EST) can be used with individuals in Priority Group 1 only, receiving CE or SE contract services. The DSA Counselor, working with the individual and the Contractor, will designate the services to be used. The Discovery and Profile and Career Exploration services only, can be used with transition aged youth, age 16 or above, on a Trial

Work Plan or Individualized Plan of Employment, to gather assessment information related to employment, and to help identify additional employment related transition services and/or a career path and may only be paid with Title I funds.

This contract is designed to be flexible to meet the needs of the individual through ongoing communication and team meetings. Individuals may not need all services and/or extended training time. Although some services are required, others are designed to provide individuals with the flexibility to bypass optional services and/or progress through required services in less time when they meet the required outcome. Team meetings will also be utilized to determine an individual's readiness to move between services. The team includes: the individual, DSA Counselor, Contractor, and any other relevant team member.

DSA Responsibilities: The DSA agrees to provide payment for satisfactory performance of services outlined.

Partner Responsibilities: The Contractor will:

1. The Contractor has completed discovery activities that utilize a person centered approach to describe "who the individual is". and guides the planning process to develop a customized job. The Contractor will summarize the Discovery findings on the individual's profile. The Contractor has provided benefits planning information to any individual who is receiving Social Security Administration (SSA) benefits, and has referred the individual to a DSA Benefits Planning Specialist if the individual, payee, or family member has requested the service.
2. The Contractor will provide opportunities for the individual to explore potential occupations, job conditions, interests and job tasks in order to enhance their vocational goal and prepare the individual for a successful job match. Exploration activities could include but are not limited to: job shadowing, work-site tour, job sampling, trial work experiences, volunteer experiences and situational assessments.
3. The Contractor will schedule and conduct a Team Meeting with the individual, DRS Counselor and all other relevant team members to create a CE Employer Development Plan.
4. The Contractor has created the Visual Résumé with the individual. This résumé was used in the job development process to highlight the individual's potential contributions and the types of tasks the individual is interested and capable of performing. The Contractor has explained Customized Employment and outlined what the employer can expect from the individual and the Contractor during the job development process. The Contractor has developed a successful job match that meets the individual's contributions, conditions and interests and the employer's unmet needs. A job can be developed within an individual's family's business as long as the job meets the definition of competitive integrated employment.
5. The individual has worked successfully for a minimum of eight (8) weeks beginning with the first (1st) day of employment and has received all appropriate onsite supports and training. At the completion of this service, individuals can be moved to CE Maintenance if they meet the following criteria: individual is working at least sixty percent (60%) of their weekly work goal as identified on their IPE, and on-site support needs cannot be more than twenty-five percent (25%) of their total work hours per month.
6. The individual has successfully worked four of (4) or maximum of eight (8) additional weeks beyond the CE Job Coaching I and has received all appropriate onsite supports and training. The Contractor can move the individual to CE Maintenance after the maintenance criteria is met. To move to CE Maintenance, the individual must be working

at sixty percent (60%) of their weekly work goal as identified on their IPE, and their on-site support needs cannot be more than twenty-five percent (25%) of their total work hours per month. If the maintenance criteria is not met at the end of six (6) weeks, then a team meeting is required to determine if the individual needs to be moved to Onsite Supports and Training at the completion of CE Job Coaching II.

7. The individual has worked successfully for at least four (4) weeks and has received all appropriate onsite supports and training. Onsite Supports and Training can be authorized and provided a total of four (4) times in four (4) month increments.
8. The individual can be moved to CE Maintenance at the end of any four (4) week increment if they meet the maintenance criteria. The maintenance criteria specifies the individual must be working at sixty (60%) of their weekly work goal as identified on their IPE, and on-site support needs cannot be more than twenty-five (25%) of their total work hours per month.
9. If the individual remains in this service at the end of the initial three and a half (3½) months and has not been moved to CE Maintenance, a team meeting is required. Additional Onsite Supports and Training can be authorized and provided if the team determines it is needed to assist the individual with meeting the maintenance criteria.
10. The individual has worked successfully for at least four (4) weeks, and received all appropriate onsite supports and training. To achieve maintenance, the individual must work at least one entire work week without EC support, must work at their weekly work goal as identified on their IPE for the four (4) weeks of maintenance, their onsite/offsite support and training needs must be less than or equal to twenty percent (20%) of their total work hours per month, the employer is satisfied with the individual's job performance, and the individual is satisfied with their job. At the completion of CE Maintenance, if the individual has met all of the requirements, they can be moved to the CE Employment Outcome Service.
11. The individual has worked successfully for up to a total of forty-eight (48) months beyond Maintenance or until turning age twenty-five (25), whichever occurs first. The individual has received all appropriate onsite supports and training during extended services for transition.
12. The individual has been employed in a permanent job and has worked a minimum of ninety (90) calendar days beyond completion of maintenance. The Contractor has provided all appropriate training and support services, and extended services are in place. The employer is satisfied with the individual's job performance, and the individual is satisfied with the job. Only weeks where the hours worked meet the weekly work goal, as identified in the IPE, are counted toward the required ninety (90) days.

Funding/Costs: The DSA agrees to pay the Contractor, upon satisfactory performance of services outlined in agreement, up to \$27,000.00

Special Incentives - Based on availability of DSA funds, one special incentive payment may be earned per case if the following conditions are met and proper documentation is provided as described:

The Contractor may receive an incentive of five hundred dollars (\$500) per individual for a one-time payment at closure, due upon successful closure by DSA Counselor, for difficult-to-serve individuals in these categories: individuals who have felony convictions, high school students who are classified by the school as severely emotionally disturbed (SED), individuals with HIV/AIDS, individuals who are legally blind, deaf with primary communication of sign language, or deaf/blind.

Referral Process: At the time of referral, the DSA Counselor will provide the Contractor with a copy of the Eligibility Determination Form, Individualized Plan of Employment (IPE) or Trial Work Plan, and Personal Information Form. Once the intake is scheduled, the Contractor will send a CE Authorization Request Form to the DSA Counselor, Rehabilitation Technician and Program Manager. The DSA Counselor authorizes for the first two services to be used (i.e. CE Discovery and Profile and Career Exploration, etc.) within five (5) business days.

The Contractor should contact the DSA Counselor and ask for the authorization to be sent if not received within five (5) business days. The Contractor will only provide services that have been pre-authorized by the DSA Counselor. The only services that can be provided under a trial work plan include the CE Discovery and Profile service and the Career Exploration service.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

The DSA Program areas that are utilized to expand and improve services include:

Veterans Initiative

DSA Personnel consisting of Administrators from DVR and SBVI are involved in Quarterly Local Community Collaborative meetings chaired by the Community Employment Coordinator of the US Department of Veterans Affairs. The purpose of this group is to expand vocational opportunities to homeless veterans, of which many have disabilities. This group will be may be expanded to the Eastern part of the state. This collaboration allows the DSA to develop partnerships who have a vested interest in providing work opportunities to disabled veterans and other Oklahomans with disabilities. This initiative has resulted in a DSA pilot project with Langston University and the Veterans Administration to expand educational opportunities for Veterans.

Social Security Administration Certified Benefits Planners

DSA has three certified Social Security Administration (SSA) Work Incentive Counselors working and co-located within Workforce Centers and another three rotating between the remainder of the Workforce Centers and DSA offices. Workforce Center staff and DSA Benefits Planners collaborate to assist job seekers receiving SSA benefits. DSA Benefits Planners explain the importance of working at the highest possible level and above SSA's Substantial Gainful Activity benchmark. Job seekers are provided 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.

Ticket to Work Program

Coordinated activities under Ticket to Work are delivered by a statewide Ticket to Work Coordinator. The coordinator will organize activities within the DSA and with partnership employment networks (EN's) to ensure the needs of ticket holders are met at a maximum level. Ongoing outreach efforts will be conducted to recruit new partnership employment networks in order to provide more opportunities to assist ticket holders in reaching Substantial Gainful Activity (SGA) level employment outcomes. The coordinator will continue to oversee the ticket to work hotline and will provide ticket holders with information and referral for state VR, partnership EN's, and external EN's.

Limitations on use of Subminimum wage

DSA conducts annual outreach and review services for individuals earning subminimum wage under a 14c certificate. Individuals will receive information about career counseling and information and referral services, as well as other components to the Vocational Rehabilitation program. The intent is to inform all individuals of the VR process in relation to seeking and obtaining competitive integrated employment. All individuals newly hired have to receive the career counseling and information and referral services two times the first year of employment and annually afterwards. In 2018-2019 the DSA reached approximately 2,553 individuals through this outreach effort. The DSA also worked with the Department of Labor to provide information and training services to employers who hold the 14c certificate. All newly hired individuals have to receive the career counseling and information and referral services two times the first year of employment and annually afterwards. The DSA provides documentation in collaboration with the local school district of specific services to youth 24 and younger, if those individuals are known by the DSA to be seeking subminimum wage work.

Workforce Advisory Committee

The Governor of the State of Oklahoma has established a Workforce Advisory Committee to put forth recommendations and a strategic framework of moving Oklahoma's workforce to a top 10 status. The committee is comprised of decision-makers, subject matter experts and stakeholders throughout the state. The committee's primary work is leveraging the state's existing workforce and employment related agencies to develop an efficient and effective model. The results are recommendations aligned with the needs of business and industry. The DSA executive director is a member of the Workforce Advisory Committee. The DSA is leading the efforts regarding a policy recommendation to increase education/training participation rates of underserved and disengaged populations by supporting and leveraging programming targeting minorities, at-risk populations and the formerly incarcerated.

Other DSA program areas that are utilized to expand and improve services include:

- Services for the Blind and Visually Impaired Center in Tulsa and Oklahoma City
- SBVI Technology Lab and Training Lab in Tulsa and Oklahoma City
- Visually Impaired and Blindness Empowerment (VIBE)
- DVR Technology Lab and Training Lab in Oklahoma City
- Oklahoma School for the Blind (OSB) transition work adjustment program
- Partnering with OSB for Vocational Evaluations
- Project Search
- Business Services Program
- Business Enterprise Program
- Office of Juvenile Affairs collaborations
- Department of Veterans Affairs collaborations
- On-line applications
- Customized Employment
- JOBS Contract
- Wellness Recovery Action Plan Training (WRAP)
- Summer Transition Employment Program (STEP)

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

The DSA delivers assistive technology statewide for VR eligible job seekers or applicants in their journey to employment. The Assistive technology specialists complete a variety of different assistive technology assessments and evaluations for job seekers, business work sites, and workforce system partners. The types of evaluations are home modifications, vehicle modifications, personal mobility needs, computer access, worksite modifications, and activities of daily living, communication school accommodations, and accessibility reviews. Assistive technology specialists focus on the reported obstacle, rather than the disability diagnosis. A big part of an assistive technology evaluation is to identify what the real problem or obstacle is for the individual job seeker or business work site. Once a need for AT is identified, the DSA Assistive Technology unit completes reports and make recommendations to counselors for both Assistive Technology equipment and the vendors currently approved on the statewide contract for the DSA. The Assistive Technology specialists also schedule inspection and release of the equipment once it has been delivered. When the equipment is received, a follow-up client visit is scheduled for training on how to use the equipment and ensure the equipment is in working order.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

The outreach procedures that the DSA will utilize to identify and serve individuals with disabilities for PY 2022 and PY 2023 are:

Services to the Deaf and Hard of Hearing Unit (DVR)

The staff of DVR Services for the Deaf and Hard of Hearing (SDHH) Unit are committed to providing communication access and employment opportunities for those with hearing loss. All staff has a competency of American Sign Language fluency, ranging from novice to expert and SDHH also employs a trilingual staff member allowing provision of services to Spanish speaking individuals with hearing loss. SDHH provides services to adults and transition aged youth with hearing loss across the state and works closely with the Oklahoma School for the Deaf, which provides office space for a counselor on campus who provides transition services to Deaf and hard of hearing youth at the school.

SDHH has been working with DVR field offices across the state providing resource kits which include assistive listening devices and interpretive equipment to assist in communicating with individuals with hearing loss. SDHH also provides consultation regarding assistive technology devices, medical hearing devices such as hearing aids and cochlear implants, and cultural mediation for Deaf job seekers with agency staff, employers, and organizations.

Each staff member is equipped with a videophone provided on their agency computers, which allow for direct contact and telecommunication between SDHH staff and those who are deaf and use sign language.

Hispanic Community Outreach

For consumers that speak a language other than English, this unit has access to translation/interpreter services for other native languages.

- Spanish translated Transition brochures and checklists to be disseminated to high school students and parents about Vocational Rehabilitation Services.
- Two Bilingual counselors serve job seekers statewide in outreach efforts
- Videophones will be utilized for outreach to the Hispanic population statewide, reaching within the rural communities.
- An emphasis on all divisional brochures to be translated into Spanish to provide information to Hispanic individuals.
- Assists the SRC with translation of brochures and documents into Spanish.
- Hispanic Chamber of Commerce — employment contract on Job Placement, Employment and Retention, and Supported Employment to serve Spanish speaking job seekers.
- Spanish speaking Interpreter is available statewide for counselors in the metro and rural areas who can translate forms, applications, plans, etc. The Interpreter travels to outlying offices to interpret for meetings between consumers and Spanish speaking families of consumers. When forms in Spanish are understood, completed and signed by the consumer, they are translated into English to capture information in the AWARE case management system.

American Indian Vocational Rehabilitation Programs (AIVR)

The DSA Tribal Liaison works with the DSA and Oklahoma Tribal Vocational Rehabilitation (OKTVR) programs. The liaison's role will be to assure that appropriate referrals are made between the DSA and OKTVR programs. The liaison assists with collaboration between programs to assure that eligibility decisions and individualized plans of employment are developed with collaboration between both programs.

The DSA met with the OKTVR Tribal programs during PY 19 to update MOUs to ensure that vocational rehabilitation services are being provided on a consistent basis with effective collaboration between both programs.

The DSA has VR specialists assigned to each high school in Oklahoma. If the OKTVR program has transition services in their grant, DSA staff refers job seekers to their program, and they refer job seekers to the DSA. DSA staff will visit schools together, introduce OKTVR staff to school personnel, conduct joint trainings, and attend local transition team meetings. Co- shared services may apply, however, if the OKTVR does not have transition services in their grant, DSA staff share their programs contact information with the youth and family, connect with OKTVR staff, share their application when they reach the age of 18, and conduct joint community trainings together.

DSA and OKTVR personnel currently participate in monthly meetings chaired by the OKTVR Directors. The DSA and OKTVR programs both participate in the annual Consortia of Administrators for Native American Rehabilitation (CANAR) meetings, and have open lines of communication between the DSA Director, Division Administrators, Field Service Coordinators and Program Managers of the DSA, as well as OKTVR Tribal Directors.

Strategies for Recruitment Efforts of Professional Counselors from Minorities, Underrepresented and Underserved Populations

The DSA's goal is to continue to foster and maintain our long-standing relationships with Langston University (the State of Oklahoma's only historically black university). DSA staff members are committed to working with institutions of higher education, which is the only CORE-accredited rehabilitation counselor programs in the State of Oklahoma. This commitment

is shown by their willingness to work as adjunct professors or guest lecturers. The DSA Director's strategy is to assign the Project Coordinator for National Diversity Recruitment, as a liaison to Langston University, which produces counselors on its Oklahoma City and Tulsa campuses; in order to, help facilitate activities between the DSA and Langston related to the development and recruitment of qualified professional counselor staff members for the DSA. The DSA will consider additional outreach to State University's as needed to enhance recruitment efforts of university students who are considering work as a licensed professional counselor (LPC) or certified rehabilitation counselors.

Additionally, the Project Coordinator is assigned the responsibility to act as the DVR/SBVI designee or point-of-contact with groups like Oklahoma AIVR Programs, the Consortia of Administrators for Native American Rehabilitation, Inc. (CANAR), state and local Chambers of Commerce, city councils, Hispanic Chambers of Commerce and community-based rehabilitation programs that impact counselor diversity issues within the DSA.

4. THE METHODS TO BE USED TO 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, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

The DSA provides pre-employment transition services to students with disabilities and will work with agency staff to identify additional programs and services the staff wants to implement and provide in their local areas. Formal MOUs, contracts, and other agreements will be generated with partners to diversify and expand what can be provided to students in this area.

Through an interagency agreement with the State Education Agency (SEA), the DSA will provide guidance to the schools in the state to encourage a focus on the five required areas in the delivery of transition services that are required under the Individuals with Disabilities Education Act (IDEA). The DSA will continue to maintain and expand a collaborative relationship with the SEA in order to improve the delivery of Pre-ETS statewide.

The DSA has partnered with Northeastern State University, RiverHawks Scholar Program in Tahlequah, Oklahoma to provide a postsecondary certificate program for students with intellectual and developmental disabilities. This fully integrated four year program with individualized supports provides:

Independent Living-Residential Life Experience

Social Skills-Social and Fitness Mentors

Career Development-On and Off campus internships and job sampling

Academics-Mix of course catalog and RSP courses

This partnership allows students with intellectual and developmental disabilities to experience the college campus, residential life and curriculum courses while getting real life experience in independent living and social skills. Students in this program will also complete multiple on and off campus internships and job sampling opportunities.

The Oklahoma Inclusive Post-Secondary Education Alliance (OK IPSE Alliance)

A partnership between the DSA, Sooner SUCCESS and Oklahoma State Department of Education. The Alliance will bring together key collaborators that work with students with intellectual or developmental disabilities (IDD) in order to support inclusive post-secondary education (IPSE) programs and the students they serve. Key areas of focus include: provide a format to engage key collaborators and enhance the environment in Oklahoma for further IPSE

opportunities; provide information and resources to existing IPSE programs; collect information from current programs; and provide training opportunities to build capacity for transition opportunity education including IPSE programs for students with IDD.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

The Employment Support Services (ESS) Unit is responsible for coordination and monitoring CRPs. An ESS technical assistant is assigned to every CRP with whom DSA contracts, with the responsibility to work with the CRP, counselor, employer and individual to ensure an effective working relationship is maintained and to resolve any disputes that may occur. The ESS Unit also provides training to the CRPs to keep them up-to-date on current best practices in the field. The DSA conducted an Employment Support Services 360 analysis resulting in the need for supported or customized employment in some rural areas of the state, also a lack of CRP vendors in remote areas, including southeastern Oklahoma.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

The DSA will focus upon the case process upfront to work with job seekers to provide employment information during the planning process before writing a plan for employment, thus engaging job seekers in their employment goals.

The DSA will target success by focusing upon comprehensive assessments as the core part of the employment plan. This will assist job seekers in focusing on their employability and skill deficiencies. The DSA is setting higher expectations through the work with Coaching for VR Quality Outcomes, utilizing more resources statewide, and connecting with more national initiatives and programs such as the Talent Acquisition Portal (TAP).

The DSA is committed to meeting the performance accountability measures and working with core program partners, as outlined under section 116 of WIOA.

Participation in projects that aid in state performance measures include:

State Wage Interchange System Agreement- The DSA and other core partners signed the SWIS agreement so that the quarterly wage records could be shared with other states to assist in submitting annual performance reports.

AJLA Data Sharing Project- Collaboration with the DSA case management system to build an interface that allows the DSA to share data for common reporting for sharing DSA data with the Oklahoma Office of Workforce Development. The office of management and Enterprise services is in process of posting a request for proposals to the replace the current ALJA case management system that currently houses the statewide job bank. The DSA has been included in the process and requested the ability to maintain our current data transfer process from AWARE to the new system that is selected to ensure the required statewide performance reporting agreement is maintained and accurate.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

Oklahoma is focused upon accessibility for all job seekers and businesses customers at all levels of Oklahoma Works. This initiative promotes a statewide vision, aligns and uses state data, expands effective partnerships, and modifies the use of resources and incentives to support an integrated vision. The Oklahoma Governor's Council for Workforce and Economic Development

(GCWED) is playing a key role as the vehicle to establish the state vision for workforce and economic development integration.

Working with the GCWED, the system partners bring sharper focus on developing and employing more Oklahomans with disabilities. The DSA director is an ex-officio member of the GCWED. The DSA also has staff on the Workforce System Oversight Subcommittee and State Youth Council. Further, the DSA has representatives on each local workforce development board and youth committees. This involvement means the DSA is committed to working to develop creative solutions that expand and improve Oklahoma's workforce, thus increasing opportunities for people with disabilities to ensure complete access to employment statewide.

The DSA is leading Oklahoma's Workforce System towards enhanced accessibility. The objective is to provide equitable services to individuals with disabilities and to ensure that all Workforce System partners comply with the Americans with Disabilities Act (ADA).

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.

To operationalize the Access for All initiative, a task force has developed a five-star evaluation model with supporting resources to be used for self-assessment and continuous improvement of the accessibility of the workforce system in the areas of Customer Service, Outreach, Physical Accessibility, and Training (with programmatic accessibility embedded throughout the framework). The tool is accompanied by a Phase I implementation policy and a curated catalog of resources that can be tracked for enhanced professional development is in progress.

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 collaborates 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. Job-seekers are provided 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 recognizes opportunities to reach Oklahoma's businesses and employers with a powerful message of Access for All. Through relationships old and new, DSA and OKABT will 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. The creation of fact sheets and other concise deliverables will help businesses and employers to understand not only their obligations, but also the importance of hiring and promoting 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. The DSA ADA Coordinator provides training in various aspects of the Americans with Disability Act and the 2010 ADA Standards for Accessible Design to staff and supervisors of these entities as well. These services are available in order to advance the promotion of equal access for individuals with disabilities in programs, services, and buildings statewide.

One stop system certification policy standards for accessibility

The one-stop system standards and certification criteria policy are designed to integrate physical and programmatic accessibility into the benchmark criteria for center certification.

Utilizing the Americans with Disability Act (ADA) for physical accessibility and the Oklahoma Electronic and Information Technology Accessibility Law and Standards for accessibility of digital services. The Web Content Accessibility Guidelines (WCAG) 2.0, Levels A and AA, will be utilized for websites, web applications, and digital documents certification criteria and standards.

Ensuring opportunities for all is critical to meet the goal in creating an environment where people with disabilities have the same opportunities to participate in the workforce as do people without disabilities. As businesses and employers find that the labor pool is tightening, following through on these criteria and standards will ensure businesses and employers have access to more qualified people to fill needed positions.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The DSA divisions of Vocational Rehabilitation (DVR) and Services for the Blind and Visually Impaired (SBVI) have updated goals and priorities for PY 2022 and PY 2023 .

Goal 1: Deliver quality opportunities for employment, independent living and economic self-sufficiency to Oklahomans with disabilities

DVR/SBVI Objective I: Model Statewide Accessibility through Access for All

Key Performance Measure: Increase knowledge and awareness of accessibility issues.

Strategies:

- Continue statewide workforce center accessibility reviews as needed. (DVR/SBVI)
- Conduct Access for All training for the Workforce system. (DVR/SBVI)
- 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)
- 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)

DVR/SBVI Objective II: Expand public awareness and visibility

Key Performance Measure: Develop Business strategies to reach employers. (DVR)

Increase the number of employment opportunities for blind individuals statewide (SBVI)

Strategies:

- Prepare elective trainings via webinar for DRS counselors in the areas of federal and state hiring practices; utilizing temporary employment services agency, House Bill 1340, on the job training, and “how to” of training soft skills and resume writing to consumers.
- Market Business Services Program overview in DRS publication, employee newsletter and existing DRS social media outlets.
- Create a school to work Transition vending pilot program.
- Present Business Services Program to civic organizations, workforce boards, local chambers of commerce and other business related entities.
- Produce videos of consumer success stories utilizing social media.
- Create a Talent Acquisition Portal as a solution for counselors and businesses.
- Connect with occupational liaisons from local businesses.
- Expand Business Services by having a direct job placement specialist in each area of the State.
- Participate in community partner meeting and events.
- Market DRS/SBVI by distributing informational materials statewide
- Participate in job fairs and events as a vendor. (DVR/SBVI)
- Conduct radio interviews statewide. (SBVI)
- Maintain Services for the Blind and Visually impaired Facebook page. (SBVI)
- Implement Business Services Client list serve to alert clients directly of job opportunities available to them. (DVR/SBVI)

DVR/SBVI Objective III: Continuously build relationships to deliver employment opportunities and prepare job-seekers with disabilities for the workforce through Oklahoma Works

Key Performance Measure: Increase average annual wage of consumers with disabilities placed in employment. (DVR/SBVI)

Strategies:

- Alignment of strategic and state plans with the Governor’s Vision: Oklahoma Works.
- Utilize DRS Business Service team to expand business relationships leading to career opportunities for consumers. (DVR/SBVI)
- Expand participation of consumers with disabilities enrolled in the OKJOBMATCH® system.
- Increase Measurable Skill Gains on active cases
- Increase active caseload total by 5%
- Expand opportunities for consumers to gain blindness independence skills

DVR/SBVI Objective IV: Create and leverage partnerships to maximize resources that reflect the needs of consumers with disabilities

Key Performance Measure: Partnerships for successful consumer employment placements.

Strategies:

- Career guidance and counseling based upon job opportunities and labor market statistics.
- Engage consumers in preparation for employment.
- Consumer Employment Outcomes.
- Community Outreach.
- Consumer's soft skills.
- Expand mental health partnerships.
- Manage the Vocational Rehabilitation waiting list to clear Priority Group 1 consumers monthly and review the ability to serve Priority Group 2 &3 semi-annually.
- Input from blind consumer groups on their perceptions of quality outcomes

Goal 2: Produce results that are accountable to the public and our customers.

DVR/SBVI Objective I: Market the mission, vision and values statewide

Key Performance Measure: Increase client access to employment services

Strategies:

- Distribute labor market information to field staff of rehabilitation agencies so they can create an informed and ready workforce to meet the needs of business.
- Develop greater awareness in the business community of the value of an undiscovered pool of ready and talented workers among persons with disabilities.
- 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.

DVR/SBVI Objective II: Effectively manage and employ state and federal policies, procedures and productivity requirements

Key Performance Measure: Increase number of successful employment outcomes for consumers with disabilities

Strategies:

- Work to open Priority Groups or release clients off waitlists.
- Collect and use information from surveys, studies and data to evaluate program effectiveness and implement improvements.
- Timeliness and movement of caseloads more quickly.
- Utilize Business Services Program and regional liaisons to improve employer relationships

- Increase caseload size to offer more opportunities to Oklahoman's with blindness and visual impairment who are seeking employment. (SBVI)

DVR/SBVI Objective III: Provide quality services with all decisions supported by information that is factual, available to all, and consistent

Key Performance Measure: Quality decisions for consumers reaching employment goal

Strategies:

- Strengthen consumer job readiness.
- Produce quality vocational evaluations and assessments of consumers.
- Produce quality Psychological Evaluations and Assistive Technology Reports.
- Focus on working with blind consumers in the office setting and staff impact on consumer's life. (SBVI)

Goal 3: Strengthen Our Workforce

DVR/SBVI Objective I: Build careers and retain talented and engaged employees

Key Performance Measure: Improve retention and attrition rates

Strategies:

- Increase employee accountability for results.
- Improve recruitment of quality applicants, maintaining Certified Rehabilitation Counselor standard.
- Increase academic development.
- Competitive Salaries.
- Implement a consistent strategy to provide dedicated funding for career advancement opportunities for employees.
- Increase academic development with emphasis upon informed choice and skills in blindness training. (SBVI)

DVR/SBVI Objective III: Develop new and enhance existing training, mentoring and educational development opportunities.

Key Performance Measure: Promote educational opportunities that lead to advances in employment. (DVR) Improve performance outcomes (SBVI)

Strategies:

- Inform staff and community of the benefits of working with DRS
- In-depth training on blindness and deaf blindness. (SBVI)
- Provide opportunities for formal mentoring agency wide.
- Provide opportunities for employees to attend HCM courses
- Implement New Employee Blindness Orientation (SBVI)

DVR/SBVI Objective IV: Deliver leadership development opportunities to increase organizational growth.

Key Performance Measure: Increase employee engagement and leadership development

Strategies:

- Provide a new employee academy with virtual attendance options for staff
- Identify leadership programs to enhance staff development
- Implement the Crucial Conversations Curriculum
- Develop and implement a Supervisor Core Competency Academy

Goal 4: Strengthen our Infrastructure

DVR/SBVI Objective I: Produce progressive policy changes

Key Performance Measure: Improve Business processes

Strategies: Streamline and implement policy change according to WIOA legislation requirements

DVR/SBVI Objective II: Implement results on IT technology

Key Performance Measure: Meet IT requirement by enhancing IT partnerships

Strategies:

- Utilize IT resources and tools to improve or streamline service delivery.
- Create and implement an electronic filing system for travel reimbursement.
- Implement state and agency business strategies and requirements implemented through Information Technology Oversight Committee.
- Work with Alliance, AWARE case management provider to develop an online application for consumer access and data sharing process in partnership with Oklahoma Works.
- Explore virtual platforms for clients and staff to use in providing services and communicating.
- Create and Implement electronic signature options for employees, consumers and vendors.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

For FY 22 & FY 23, the I&E innovation and expansion funds will support the following 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.
- Policy and Legislative 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.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

The DSA will utilize the following strategies to overcome any barriers to accessing the vocational rehabilitation and supported employment programs for PY 2023:

- Inadequate transportation and lack of information about existing transportation are identified barriers to individuals with disabilities traveling to and from VR Services, and accessing training, education, and employment through Supported Employment Services. Oklahoma recently established the Office of Mobility and Public Transit and the DSA has continued to partner with the Oklahoma Department of Transportation to ensure the transportation needs of individuals with disabilities are included during the development of the Oklahoma Transit Plan.
- Oklahoma is focused upon accessibility for all job seekers and businesses and employer's work sites throughout all levels of Oklahoma Works. Working with the Governor's Council for Workforce and Economic Development (GCWED), system partners bring sharper focus on developing and employing more Oklahomans with disabilities.
- To help build a foundation for the Access for All initiative, the Oklahoma Department of Rehabilitation Services (OKDRS) and Oklahoma ABLE Tech (OKABT), partner to provide regional Access for All technical assistance in the form of, academies, webinars, newsletters, and weekly tips statewide. To operationalize the Access for All initiative, a task force has developed a five-star evaluation model with supporting resources to be used for self-assessment and continuous improvement of the accessibility of the workforce system in the areas of Customer Service, Outreach, Physical Accessibility, and Training (with programmatic accessibility embedded throughout the framework). The tool is accompanied by a workforce system policy and a curated catalog of resources that can be tracked for enhanced professional development.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

The DSA Divisions of Vocational Rehabilitation and Services for the Blind and Visually Impaired outcomes, goals and indicators which pertain to the agency's management of the Vocational Rehabilitation and Supported Employment programs for PY 2021 and PY 2022 is outlined as follows.

The DSA continues to collect and report on all performance indicators. The performance indicators are:

- Employment (Second Quarter After Exit)
- Employment (Fourth Quarter After Exit)
- Median Earnings (Second Quarter After Exit)
- Credential Attainment Rate

- Measurable Skill Gains

The DSA will continue efforts to focus on the case process upfront to work with job seekers and provide employment information during the planning process, before writing a plan for employment; engaging job seekers in their employment goals. The DSA will target success by focusing upon comprehensive assessments as the core part of the employment plan. The DSA continues to focus on Quality Outcomes, by utilizing more resources statewide, and connecting with more national initiatives and programs such as the Talent Acquisition Portal (TAP).

The DSA has implemented a referral module statewide, that allows counselors time initially to work with jobseekers to assure individual plans reach successful employment outcomes. Although not mandatory at this time, it is proving to be effective in areas in which the DSA receives a significant number of walk in applicants.

For analysis and tracking towards meeting goals and priorities of the VR and the Supported Employment programs, the Program Standards Section, Programs Managers, and Field Service Coordinators conduct regular case reviews. The VR Case Management Liaison works with the Program Standards Section on meeting federal regulations issues, unit staff in group or individual trainings as needed, and new employee training of new counselors.

The Program Standards Section case review process assesses for federal regulation requirements of case management ensuring counselors are following regulations to meet ninety percentiles. The DSA Administration and the VR Case Management Liaison review results to determine if training is necessary to enhance understanding and knowledge of federal regulations.

The DSA Supported Employment program conducts annual audits of vendors to review compliance of programs to meet quality standards and case documentation requirements. Contracted vendors must submit a mid-year and end of year report that details their progress towards meeting standards. Consumers are given the opportunity to evaluate providers at time of case closure. The DSA Employment Support Services unit will begin initiating a report card that provides a snapshot of vendor's performance allowing for consumer informed choice. The Performance Standards Section will also begin to include an evaluation of vendors on the closed cases survey.

Strategies that contributed to the achievement of meeting goals and priorities include;

- The waiting list is reviewed monthly by program, fiscal and administrative staff to determine the current level of existing resource capacity. The goal is to be able to clear priority group 1 monthly and if possible to reduce the waiting list for priority groups 2 & 3. Releases from the waiting list are based on priority group ranking and applications with the earliest date are removed first.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Factors that impeded the achievement of meeting goals and priorities include;

- DSA job seekers employability and skill deficiencies
- DSA has been on Order of Selection that has contributed to less employment outcomes overall. It is anticipated that this will impact the DSA's application, plan, and successful outcome totals for the next 2-3 years.
- Covid-19 pandemic. Covid-19 has created challenges for staff, students and consumers. As offices and schools closed, so did employment opportunities, training programs and transportation services for consumers were impacted and recovery back to a normal is slow.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

The strategies that contributed to the achievement of goals in PY 2020 are:

- DSA's partnership with DDS and State Employment Leadership Network (SELN)
- Implemented virtual CRP training during the pandemic to maintain training schedule while observing health and safety standards.
- Adjustments were made to the way services and supports were provided to follow CDC health and safety guidelines and employer restrictions.
- Creation of a job furlough report to document and follow lay-offs due to the Covid-19 pandemic.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Factors that impeded the achievement of meeting goals and priorities in PY 2020 include;

- Lack of DSA contracted CRPs in rural areas of the state
- Lack of joint contracted DSU/DDS CRPs
- DSA remains under Order of Selection for all priority groups
- Loss of CRPs during the pandemic
- Many individuals who were considering VR services hesitated to apply for services because of fear related to the virus.
- Eligible clients were hesitant to proceed with supported employment services due to health and safety concerns.
- Stimulus money received by potential DSA applicants and/or existing DSA service recipients also contributed to the pursuit of services and employment.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

The DSA processes a quarterly report to its federal oversight agency, the Rehabilitation Services Administration (RSA) which includes both VR program data plus data elements for the PIRL (Participant Individual Record Layout) required for joint annual reporting under WIOA. This quarterly reporting process has been in place since October 2017 (Program Year 2017, Quarter 1). Between October 1, 2018, and December 31, 2018, DSA submitted its first annual WIOA Statewide and Local Performance Report (ETA 9169). The DSA submitted the most recent annual performance report in October 2021 and concluded a two-year baseline for collecting and gathering baseline data for WIOA performance measures. Internally, DSA Leadership has established a Performance Measures team who reviews current data and performance indicators. DVR and SBVI Leadership regularly discuss Federal Reporting issues and review specific data elements as areas of focus. Information and targeted training about those critical elements are shared and provided to field staff to assure the DSA is collecting and reporting accurate and complete data. The DSA continues to work diligently with its core partners, its consumers, and software providers to collect accurate and timely information.

The DSA has determined expected levels of performance for the following performance indicators:

Title IV Vocational Rehabilitation Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	48.3%		48.3%	
Employment (Fourth Quarter After Exit)	37.9%		37.9%	
Median Earnings (Second Quarter After Exit)	\$4,384.58		\$4,384.58	
Credential Attainment Rate	38.8%		38.8%	
Measurable Skill Gains	58.6%		58.6%	

- Effectiveness in Serving Employers (this State-level primary indicator remains “baseline” for all core programs while under pilot).

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

The DSA complies with innovative and expansion activities by ensuring improved efficiency and service delivery through a system wide approach. Innovation and Expansion during PY 2020 totaled \$218, 058.85.

Projects include, but are not limited to the following:

- Club Houses - Transitional Employment
- Educational Sponsorship
- Student Awards Banquet
- Job Readiness Boot Camp
- Brainstorming for Success - A Transition Forum
- Oklahoma Rehabilitation Council (SRC)
- Business Advisory Council

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

1. 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

DSA remains committed to the provision of quality services to individuals with the most significant disabilities. Quality of services is based on Supported Employment outcome-based contracts.

Quality

Services and/or milestones are preauthorized and monitored by the counselor working with the individual. In order to be paid, the CRP must submit evidence that each outcome has been achieved. Some outcomes include individual and employer satisfaction surveys. The employee survey is designed to reflect satisfaction with the job and any concerns. The employer survey is designed to reflect evaluation of the individual's job performance, stability, and training needs.

There are contract performance measures defined in the contract. There is a "Minimum Contracts Standards" section which defines standards for average work hours and average wages at closure that is updated annually. This section also defines requirements for staff qualifications such as base salary paid and completion of required training.

DSA is committed to providing excellent training for CRPs to ensure quality services for individuals. DSA has contracted with the University of Oklahoma National Center for Disability Education and Training since 1987 to provide training for CRP staff. The Employment Consultant (EC) must complete the Employment Consultant training within 6 months of hire. Each EC must also successfully complete the following additional training courses within 12 months of hire: Social Security Work Incentives; Job Development/Marketing; Job Club; Online Introduction to Positive Behavior Supports in the Workplace (prerequisite for Positive Behavior Supports in the Workplace); Positive Behavior in the Workplace, customized employment and instructional supports and Blind Culture and Job placement for Individuals with Vision loss. In addition to the required training listed above, six hours of continuing education is required each year. The DSA staff also provides periodic training and additional advanced trainings annually to CRPs to keep them up to date on current best practices.

DSA monitors contract compliance, provides an outcomes-based report on data drawn from the AWARE case management program. DSA reports to CRPs on minimum contract standards and whether those standards have been met or will require a plan for improvement. Every CRP has a TA who helps resolve service delivery problems and monitors for contract compliance on an annual basis.

Scope

The DSA contract allows CRPs to serve individuals with the most significant disabilities without restriction on disability type. The majority of individuals served in Supported Employment are individuals with intellectual disabilities and/or serious mental illness. Individuals with other types of disabilities are being served as well. DSA continues to seek methods to increase participation of individuals with all types of disabilities in supported employment programs. ESS provides training on Supported Employment to DSA staff in an ongoing effort to reach underserved and unserved populations.

The Supported Employment contract offers two levels of support; regular rate, and intensive support rate for those with greater support needs. If the DSA counselor determines the individual will require additional support to be successful, milestones can be authorized at the intensive support rate.

Extent

The DSA issues annual Supported Employment contracts serving individuals with the most significant disabilities. The figures hinge on the support of the state to match federal dollars

necessary to provide Supported Employment to individuals with the most significant disabilities.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

Timing

Extended services are a continuation of ongoing support services provided to individuals with the most significant disabilities. After stabilization is achieved with up to 24 months of onsite training and supports, the team identifies the individual's needs and develops a plan for the transition to extended services. Such services consist of the provision of specific services, including natural supports, needed to maintain the supported employment placement. Extended services are specifically identified in the IPE. Except as provided by federal law with regard to youth with the most significant disabilities, extended services are paid from funding sources other than DVR and SBVI. An individual may not be found ineligible for supported employment services because the resource for providing extended services cannot be identified.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

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 WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Oklahoma Department of Rehabilitation Services

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 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;

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 AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20], 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;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT 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;

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

CERTIFICATION SIGNATURE

Signatory information	Melinda Fruendt
Name of Signatory	Melinda Fruendt
Title of Signatory	Executive Director
Date Signed	March 15,2022

ASSURANCES

The State Plan must include	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 State Plan must include	Include
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 case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
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. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
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. 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. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select	No

The State Plan must include	Include
yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.h. The descriptions 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	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
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)(D) and (20) of the Rehabilitation Act	

The State Plan must include	Include
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 in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	No
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 requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) 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 section 101(a)(14) 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,	

The State Plan must include	Include
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. 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) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
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	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
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)(G) and (H) of the Rehabilitation Act	

The State Plan must include	Include
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:	Yes
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:	
7.b.i. 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	
7.b.ii. 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)(6)(C) and (E) of the Rehabilitation Act	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	48.3%	50.6%	48.3%	51.6%
Employment (Fourth Quarter After Exit)	37.9%	37.9%	37.9%	38.7%
Median Earnings (Second Quarter)	\$4,384.58	\$4,750	\$4,384.58	\$4,845

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
After Exit)				
Credential Attainment Rate	38.8%	39.3%	38.8%	39.8%
Measurable Skill Gains	58.6%	70.9%	58.6%	72.9%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	66.7%	70.0%	66.7%	70.0%
Employment (Fourth Quarter After Exit)	66.0%	67.3%	66.0%	67.3%
Median Earnings (Second Quarter After Exit)	\$5,000.00	\$5,675.00	\$5,000.00	\$5,675.00
Credential Attainment Rate	65.5%	70.5%	65.5%	70.5%
Measurable Skill Gains	60.0%	61.0%	60.0%	61.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	75.0%	73.3%	75.0%	73.3%
Employment (Fourth Quarter After Exit)	74.1%	70.5%	74.1%	70.5%
Median Earnings (Second Quarter After Exit)	\$7,371.00	\$8,360.00	\$7,371.00	\$8,360.00
Credential Attainment Rate	68.0%	75.0%	68.0%	75.0%
Measurable Skill Gains	62.0%	67.0%	62.0%	67.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	70.0%	73.0%	70.0%	73.0%
Employment (Fourth Quarter After Exit)	66.0%	71.0%	66.0%	71.0%
Median Earnings (Second Quarter After Exit)	\$3,200.00	\$3,650.00	\$3,200.00	\$3,650.00
Credential Attainment Rate	50.0%	61.3%	50.0%	61.3%
Measurable Skill Gains	59.0%	59.0%	59.0%	59.0%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	59.1	59.1	59.1	59.1
Employment (Fourth Quarter After Exit)	61.0	61.0	61.0	61.0
Median Earnings (Second Quarter After Exit)	5,900.00	5,900.00	5,900.00	5,900.00
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

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	34.0%	34.5	36.0%	36.0
Employment (Fourth Quarter After Exit)	36.0%	36.5	38.0%	38.0
Median Earnings (Second Quarter After Exit)	\$3,900.00	\$3900.00	\$4100.00	\$4100.00
Credential Attainment Rate	24.0%	24.0	27.0%	27.0
Measurable Skill Gains	41.0%	41.0	41.0%	42.0
Effectiveness in	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Serving Employers				

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	48.3%	50.6%	48.3%	51.6%
Employment (Fourth Quarter After Exit)	37.9%	37.9%	37.9%	38.7%
Median Earnings (Second Quarter After Exit)	\$4,384.58	\$4,750	\$4,384.58	\$4,845
Credential Attainment Rate	38.8%	39.3%	38.8%	39.8%
Measurable Skill Gains	58.6%	70.9%	58.6%	72.9%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

1

“Effectiveness in Serving Employers” is still being developed and this data will not be entered in the 2022 State Plan modifications.

ADDITIONAL INDICATORS OF PERFORMANCE

Additional Indicators of Performance
Oklahoma has no additional indicators of performance at this time.

OTHER APPENDICES

Not applicable